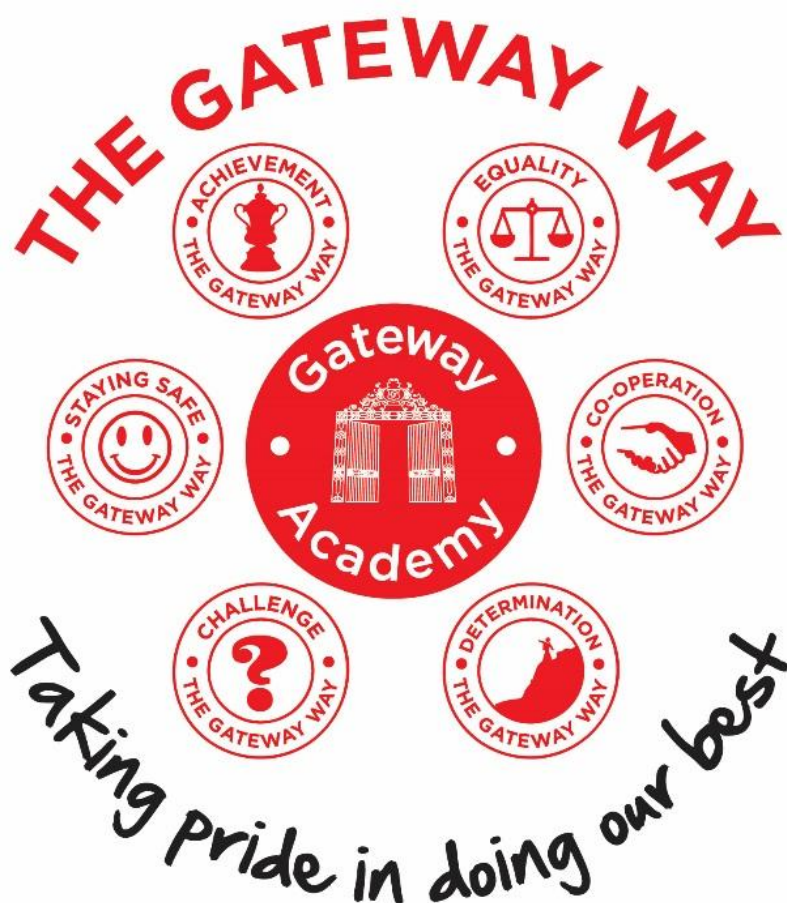


Gateway Academy



Photography Policy

Approved by: Claire Cleary and Lisa Breslin

Last reviewed on: September 2026

Next review due by: September 2028

AIMS

Gateway Academy uses photographs and videos to support learning, record achievement, communicate with families and celebrate the life of the Academy.

This policy sets out how the Academy takes, uses, stores and shares photographs and videos of pupils while protecting their privacy, dignity, welfare and safety and complying with data protection and safeguarding requirements.

This policy applies to still photographs, video recordings and digital images.

LEGAL AND REGULATORY FRAMEWORK

This policy is informed by:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018, as amended
- Data (Use and Access) Act 2025
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Children Act 1989 and 2004
- Academy Trust Handbook 2026
- Current Department for Education (DfE) guidance on data protection and taking and using photographs and videos in schools
- Relevant Information Commissioner's Office (ICO) guidance

The policy should be read alongside the Academy's:

- Data Protection Policy
- Child Protection and Safeguarding Policy
- Online Safety Policy
- Acceptable Use arrangements
- Mobile Phone Policy
- Records Management and Retention arrangements
- Privacy Notices

The DfE confirms that photographs and videos of identifiable individuals are personal data and must be processed in accordance with data protection law.

SCOPE

This policy applies to:

- all pupils

- all staff
- governors
- volunteers
- supply staff
- students and trainees
- contractors and external professionals
- visitors and external organisations taking photographs or videos on behalf of or with the permission of the Academy

It applies to photographs and videos taken on Academy premises, during Academy activities, educational visits, sporting events, performances and other activities organised or authorised by the Academy.

DATA PROTECTION PRINCIPLES

Where an individual can be identified, a photograph or video will normally constitute personal data.

The Academy will:

- identify an appropriate lawful basis for each use of photographs and videos
- be transparent with pupils and parents/carers about how images will be used
- only use images for specified and legitimate purposes
- collect and use images that are adequate, relevant and necessary
- keep images secure and restrict access to authorised individuals
- retain images only for as long as necessary and in accordance with the Academy's retention arrangements
- consider the views of pupils, taking account of their age, maturity and capacity
- take additional care where the use of an image could create a safeguarding, privacy or other risk

The Academy may rely on different lawful bases depending on the purpose for which an image is taken or used. Consent is not required for every photograph or video.

Where the Academy relies on consent, consent will be freely given, specific, informed and capable of being withdrawn.

The DfE confirms that schools may use lawful bases including public task, consent and, where appropriate, legitimate interests, depending on the circumstances and purpose.

TAKING PHOTOGRAPHS AND VIDEOS

Photographs and videos may be taken for purposes including:

- supporting and recording learning
- recording children's progress and achievements
- classroom and Academy displays
- newsletters and Academy communications

- the Academy website and approved parent communication platforms
- celebrating sporting, artistic, academic and other achievements
- educational visits, trips and activities
- Academy events and performances
- identification and operational purposes where appropriate

Pupils should normally be informed when photographs or videos are being taken and, where appropriate, the purpose should be explained.

Staff must use Academy-approved equipment and systems.

Personal mobile phones, tablets or cameras must not be used to photograph or record pupils, their work or anything else that could identify a pupil.

This is consistent with the Academy's Mobile Phone Policy and Child Protection and Safeguarding Policy.

Cameras and recording devices must not be used in toilets, changing areas or other locations where pupils have a reasonable expectation of privacy.

INTERNAL USE AND RECORDS OF LEARNING

Photographs may be displayed within the Academy to celebrate learning and achievement.

Learning Journeys, Records of Achievement and similar records may include photographs where appropriate.

Staff must consider:

- whether the image is appropriate and necessary
- whether the pupil could reasonably be embarrassed, distressed or placed at risk
- whether the image reveals sensitive personal information
- whether any safeguarding restrictions apply

Images used for learning records will be managed in accordance with the Academy's data protection and records retention arrangements.

WEBSITE, NEWSLETTER AND PARENT APP

The Academy may publish photographs through approved communication channels, including its website, newsletter and parent app, where there is an appropriate lawful basis and the use is consistent with the information provided to pupils and families.

The Academy will normally avoid publishing a pupil's full name alongside their photograph.

Where a pupil's name is required for a particular publication, the Academy will consider whether additional consent or another lawful basis is required, taking account of the purpose and context.

The Academy will not publish photographs that are inappropriate, intrusive, misleading or likely to cause unnecessary embarrassment, distress or safeguarding concerns.

Social media and other public-facing platforms will be subject to particular care because images may be shared more widely and may be difficult to remove once published. The DfE recommends that schools consider specific consent for social-media publication where appropriate.

SAFEGUARDING

The welfare and safety of pupils is the Academy's priority when taking or using photographs and videos.

Before an image is published or shared, staff must check whether there are any known restrictions relating to the pupil.

The Academy will not publish photographs or videos that could identify a pupil where doing so would conflict with a known safeguarding restriction, court order or other legal requirement.

Specific arrangements may apply to individual pupils. These will be managed on a case-by-case basis and communicated to relevant staff.

Staff must not:

- take inappropriate, intrusive or humiliating photographs or videos
- photograph pupils in circumstances where their dignity or privacy could reasonably be compromised
- use images for a purpose inconsistent with the purpose for which they were taken
- share pupil images through personal social-media accounts or unauthorised platforms
- photograph or record a pupil where doing so would conflict with a known safeguarding restriction

Any concern about inappropriate photography, filming or use of images must be reported immediately to the Headteacher and/or Designated Safeguarding Lead (DSL).

The Academy's safeguarding policy confirms that personal mobile phones must not be used to photograph or record pupils and that cameras and phones are prohibited in toilets and changing areas.

EXTERNAL MEDIA AND PHOTOGRAPHERS

The Academy will consider safeguarding, privacy and data protection implications before allowing external organisations, photographers or media representatives to photograph or record pupils.

External organisations must:

- comply with the Academy's requirements
- use images only for the agreed purpose
- comply with applicable data protection legislation
- obtain any consent required for their intended use
- follow restrictions relating to individual pupils
- securely store and dispose of images in accordance with their legal and contractual obligations

Where an external photographer or organisation processes images on behalf of the Academy, appropriate contractual data-protection arrangements will be put in place where required.

The DfE recommends that arrangements with external photographers clearly identify responsibility for data protection.

Where the media is attending an Academy event, pupils and parents/carers will be informed where appropriate.

The Academy will not rely solely on a general assumption that silence or lack of objection constitutes consent where consent is the lawful basis being relied upon.

PARENTS AND CARERS: PHOTOGRAPHY AT ACADEMY EVENTS

The Academy will decide whether photography or video recording by families is appropriate at individual events.

Where photography is permitted, parents and carers will be asked to respect the privacy of other children and families.

Personal or household photography is generally outside the scope of UK data protection legislation. However, publishing images publicly, particularly through social media, may fall outside the personal or household exemption.

Parents and carers will therefore be asked not to publish images of other children without appropriate permission and to follow any specific instructions given by the Academy.

The Academy may prohibit photography or recording at an event where this is necessary for safeguarding, privacy, operational or other legitimate reasons.

STORAGE, SECURITY AND RETENTION

Photographs and videos containing personal data must be stored securely and only accessed by authorised individuals.

Staff must not store pupil images on:

- personal devices
- personal cloud storage

- personal email accounts
- unauthorised applications or platforms

Photographs taken on Academy equipment should be transferred to an approved Academy system as soon as reasonably practicable where they are temporarily stored on a device.

Images must be securely deleted from temporary storage when they are no longer required.

The Academy will regularly review stored photographs and videos and securely delete or dispose of images that are no longer required, in accordance with its records retention arrangements.

The DfE specifically requires schools to consider the security, storage and retention of images held on cameras, memory cards, school devices, shared drives and cloud platforms.

ACADEMY EQUIPMENT

Academy cameras, tablets and other approved equipment should be used when taking photographs or videos of pupils.

Staff must follow the Academy's Acceptable Use, information-security and data-protection requirements.

Academy equipment must not be used for personal photography of pupils.

Any temporary storage of images on Academy equipment must be secure and images must be transferred to the appropriate Academy system and deleted from temporary storage when no longer required.

PUPIL MOBILE PHONES AND RECORDING DEVICES

Gateway Academy operates a **mobile phone-free environment for pupils** in accordance with the Academy's Mobile Phone Policy.

Pupils must not use mobile phones, smartwatches, tablets or other personal recording devices during the school day or Academy activities unless specifically authorised.

Any mobile phone brought into school must be handed in at Reception and will be returned at the end of the school day.

If a pupil is found using a mobile phone or recording device without permission, the Academy's Mobile Phone Policy and behaviour procedures will apply.

CONSENT AND PARENTAL PREFERENCES

The Academy will provide parents/carers with clear information about how photographs and videos may be used.

Where the Academy relies on consent, consent will:

- be freely given
- be specific and informed
- be recorded appropriately
- be capable of being withdrawn

Parents/carers may express preferences about the use of their child's image.

Where consent is the lawful basis, parents/carers may withdraw consent at any time by contacting the Academy.

Withdrawal of consent will not affect processing that has already taken place lawfully.

The Academy will also consider the views and wishes of pupils, taking account of their age, maturity and capacity.

The Academy will take reasonable steps to ensure that known restrictions are communicated to relevant staff and followed.

The Academy's Data Protection Policy requires consent to be clearly explained and recorded where it is relied upon, and provides for withdrawal in accordance with data-protection requirements.

CONCERNS AND DATA PROTECTION REQUESTS

Questions or concerns about the use of photographs or videos should be directed to the Academy office or Data Protection Officer (DPO), as appropriate.

Concerns relating to safeguarding or inappropriate photography should be reported immediately to the DSL or Headteacher.

Requests relating to personal data, including requests concerning photographs and videos, will be managed in accordance with the Academy's Data Protection Policy.

ROLES AND RESPONSIBILITIES

Governing Board

The Governing Board is responsible for ensuring that appropriate arrangements are in place for data protection, safeguarding and the secure use of photographs and videos.

CoHeadteachers

The Headteachers are responsible for implementing this policy and ensuring that staff understand and follow the Academy's requirements.

Designated Safeguarding Lead

The DSL is responsible for advising on safeguarding restrictions relating to individual pupils and ensuring that relevant safeguarding information is communicated appropriately.

Data Protection Officer

The DPO provides advice on data protection, lawful bases, consent, data sharing, data rights and data breaches.

All Staff

All staff are responsible for:

- following this policy;
- using only approved equipment and systems;
- checking relevant restrictions before using or publishing images;
- keeping images secure;
- reporting concerns or data breaches promptly.

MONITORING AND REVIEW

The policy will be reviewed annually or sooner where there are changes to legislation, statutory guidance, DfE or ICO guidance, technology or Academy arrangements.

The Academy will ensure that staff are aware of their responsibilities and that arrangements for photographs and videos are reviewed as part of its wider safeguarding and data-protection monitoring.

Appendix 1 – Parent/Carer Photograph Preferences

Gateway Academy takes photographs and videos of pupils for a range of educational, communication and celebration purposes.

The Academy will use photographs and videos in accordance with its Photograph and Video Policy and Data Protection Policy.

Please indicate your preferences below.

Use of photographs/videos	YES	NO
Academy website	☐	☐
Academy parent app/approved digital communications	☐	☐
Displays within the Academy	☐	☐
Records of learning/achievement shared with the family	☐	☐

Please note

- The Academy will normally avoid publishing a pupil's full name alongside their photograph.
- The Academy will consider your child's views where appropriate, taking account of their age, maturity and capacity.
- Some photographs or videos may be taken for purposes where consent is not the lawful basis, for example certain educational, operational or safeguarding purposes.
- Where the Academy relies on your consent, you can withdraw it at any time by contacting the Academy.
- Withdrawal of consent will not affect processing that has already taken place lawfully.
- The Academy will take reasonable steps to ensure known safeguarding restrictions are followed.

Child's name: _____

Parent/carer name: _____

Signature: _____

Date: _____

If you wish to change your preferences, please contact the Academy's office:

Email: office@gateway-academy.co.uk

Telephone: 020 7723 4977

Appendix 2 – Good Practice for Staff

Staff should:

- use Academy-approved equipment wherever possible;
- check the intended purpose before taking or publishing an image;
- check relevant pupil restrictions before publishing an image;
- consider the child's dignity, privacy, safety and wellbeing;
- avoid unnecessary identification of pupils;
- avoid images that could cause embarrassment, distress or safeguarding concerns;
- use images in the context for which they were taken;
- ensure images are appropriate and respectful;
- never share pupil images through personal social-media accounts or unauthorised platforms;
- report inappropriate or concerning photography or filming immediately;
- transfer images from temporary storage to an approved Academy system promptly;
- delete images from temporary storage when no longer required;
- follow the Academy's Data Protection, Child Protection and Safeguarding, Online Safety, Acceptable Use and Mobile Phone Policies.

Staff must not:

- use personal mobile phones, tablets or cameras to photograph or record pupils;
- store pupil images on personal cloud accounts or personal email;
- photograph pupils in toilets, changing areas or other private areas;
- publish pupil photographs through personal social-media accounts;
- use photographs for a purpose that has not been authorised by the Academy;
- retain pupil photographs unnecessarily.