

Use of Images & Digital Media Policy



As a Rights Respecting School Pennard Primary School is a safe and happy place where everyone is valued and where differences are celebrated. We not only teach about children's rights but also model rights and respect in all relationships.

1. Purpose

This policy outlines how the school safely uses, stores, and shares digital images of pupils to support learning and celebrate achievement, while ensuring robust safeguarding in line with current UK guidance, including risks associated with artificial intelligence (AI) and image manipulation.

2. Safeguarding Statement

The use of pupil images is a safeguarding matter. The school recognises that images shared online may be copied, altered, or misused, including through AI tools capable of creating manipulated or synthetic content.

We are committed to minimising risk while maintaining a positive approach to celebrating pupil achievement.

3. Principles

The school will ensure that all image use is:

- Lawful, fair, and transparent (UK GDPR compliant)
- Respectful and appropriate
- Risk-assessed before publication
- Minimised to reduce identification risks
- Securely stored and accessed only by authorised individuals

4. Consent

- Written parental/carers consent is obtained before images are taken or used
- Consent is tiered as follows

Option A = internal e.g. books and within school displays and school community e.g. Friday Flyer only sent to parent email.

Option B = All of the above + wider media e.g. instagram

- Consent is recorded, regularly reviewed, and can be withdrawn at any time
- Withdrawal requests are actioned promptly, including removal from online platforms where possible
- The school may process and use certain images without explicit consent where this is necessary for legitimate educational purposes under UK GDPR (e.g. internal use within secure school systems such as the MIS), provided this use is proportionate, secure, and does not involve public sharing

5. Safe Image Capture and Selection (OPTION B only)

To reduce risk in wider media and online use, the school will adopt image minimisation strategies:

- Avoid close-up, full-face images where possible
- Use group images or images taken from a distance
- Avoid images that reveal identifiable personal information (e.g. name badges, timetables)
- Ensure pupils are appropriately dressed
- Avoid capturing potentially sensitive or vulnerable situations

6. Publication and Sharing

Where images are shared:

- Pupils will not be identified by full name alongside images unless additional consent is obtained
- Images will be selected to reduce risk of misuse
- Only official school platforms will be used
- Privacy and sharing settings will be applied to limit redistribution where possible
- Low-resolution images may be used for web/social media publication

7. Metadata and Technical Controls

To reduce risk of tracking or misuse:

- Metadata (e.g. location, timestamps, device data) will be removed where possible before publication
- File naming will not include identifying information
- Systems and platforms used will be risk-assessed

8. Storage and Retention

- Images are stored securely on school systems
- Access is restricted to authorised staff only
- Personal devices must not be used for storage and retention unless authorised and secured
- Images are retained only for as long as necessary
- Images will be deleted in line with data retention schedules or when consent is withdrawn

9. Social Media Use

- Only official school accounts may publish images
- Staff must not use personal accounts to share pupil images
- Comments and engagement on posts will be monitored
- The school will take reasonable steps to limit downloading or resharing where platforms allow

10. AI and Image Manipulation Risk

The school recognises risks including:

- AI-generated or manipulated images (deepfakes)
- Image-based abuse or exploitation
- Unauthorised reuse of images from websites or social media
- Use of images in blackmail or coercion attempts

To mitigate these risks, the school will:

- Limit the use of highly identifiable images (e.g. distance or over the shoulder images)
- Educate staff, pupils, and parents about risks
- Regularly review online image use
- Ensure safeguarding procedures include AI-related risks

11. Incident Response

If misuse of images is suspected or identified:

- The incident will be reported immediately to the Designated Safeguarding Lead (DSL)
- The school will follow safeguarding and child protection procedures
- Steps will be taken to remove or report harmful content
- External agencies (e.g. local authority, police, or relevant reporting bodies) will be contacted where necessary
- A record of the incident and actions taken will be maintained

12. Use of Images by Parents/Carers (Included in Parent Acceptable Use Policy within Admissions Policy)

Parents/carers may take photographs at school events for personal use only.

They must:

- Not share images of other children online without permission
- Not edit, alter, or manipulate images in a harmful or misleading way
- Not publish images that identify other children or the school without consent

Failure to comply may result in further action.

13. Staff Responsibilities

Staff must:

- Follow this policy and safeguarding procedures
- Select images appropriately and minimise risk
- Store and handle images securely
- Report concerns immediately

14. Monitoring and Review

This policy will be reviewed annually or sooner in response to:

- Changes in guidance or legislation
- Emerging risks (e.g. developments in AI)
- Incidents or safeguarding concerns

Parent/Carer Consent Form (AI-Aware)

Please indicate your consent by ticking each option:

1. Internal School Use (Including Legitimate Educational Use)

I understand that the school may use images of my child for internal purposes, including learning activities, displays, assessment, safeguarding records, and secure systems such as the school MIS. This use is part of the school's legitimate use and does not involve public sharing.

☐ AWARE ☐ NOT AWARE

2. Option A Within School use as above and School Community Use (Restricted Audience)

I agree to my child's image being used in school communications shared with the school community (e.g. newsletters such as the Friday Flyer, internal platforms, and communications sent to parents/carers).

I understand that:

- These images may include identifiable images (e.g. headshots)
- They are **not** published on public websites or social media
- They are shared within a more controlled audience but may still be redistributed (we request that our school community restrict wider sharing wherever possible)

☐ YES ☐ NO

3. Option B All of the Above and Wider Media and Online Use (Public)

I agree to my child's image being used externally (e.g. school website, social media – School Instagram account, prospectus, and local media).

I understand that:

- Images will be selected to reduce risk (e.g. group images, distance, or over-the-shoulder photographs)
- Images may be publicly accessible online

☐ YES ☐ NO

Important Information About Digital Images

- Images shared online may be copied or reused by others without the school's control
- Advances in technology mean that images can be altered or manipulated using artificial intelligence (AI)
- The school takes all reasonable steps to reduce risk but cannot guarantee complete protection once images are shared online

Parent/Carer Agreement

I understand and agree that:

- I can withdraw consent at any time by contacting the school
- Images taken by parents/carers at school events are for personal use only.
- I will not share images of other children online without permission. This includes images taken at events on my own device.
- I will not edit, manipulate, or misuse images in a way that could cause harm or distress

Signed: _____

Date: _____

Example 1: Appropriate vs Not Appropriate Image Use

These examples show how we reduce risk by avoiding unnecessary identification of pupils.



APPROPRIATE – Low Identification Risk



- Taken from a distance
- Group image
- No full face focus
- No identifying information visible



- Taken from a distance
- Activity focused
- No names or personal info visible
- Appropriate clothing



NOT APPROPRIATE – High Identification Risk



- Close-up, full face
- Easily identifiable
- Higher misuse risk



- Personal information visible
- Name, timetable or display
- Increases identification risk



Remember: We **only** use images that are respectful, necessary and risk-assessed before sharing on any platform.

Example 2: Image Minimisation in Practice (OPTION B only)

These examples show how we apply minimisation strategies when using images in wider media and online.



Use group images



Group shots reduce identification risk.



Take images from a distance



Distance helps reduce identifiable details.



Avoid close-up, full-face shots



Use over the shoulder or side angles where possible.



Avoid identifiable information



Remove or avoid name labels, badges, timetables and displays.



Ensure appropriate dress



Ensure clothing is suitable and not revealing.