

# Photographs and Images Policy

Permissions, use and publication

SMS Changing Lives School



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# Photographs and Images Policy

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## Permissions, use and publication

### SMS Changing Lives School



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|-----------------------|--------------------------------------------|
| Policy owner          | Head Teacher                               |
| Issue date            | 24 September 2026                          |
| Effective date        | 1 October 2026                             |
| Next scheduled review | September 2027                             |
| Review cycle          | Annually, or earlier if required           |
| Applies to            | All pupils and all school sites / pathways |

*This policy introduces a new approach to pupil images published online from 1 October 2026.*

## 1. Purpose and scope

SMS Changing Lives School uses photographs and other images to record learning, celebrate achievement, evidence participation and communicate aspects of school life. This policy sets out how permission is recorded and how pupil images may and may not be used.

It applies to discretionary photographs and videos taken or used by the school for learning, celebration, displays, reports, communications and publicity. It does not cover CCTV or images that are strictly necessary for essential administration, identification or safeguarding where the school may rely on another lawful basis.

## 2. Change in approach from 1 October 2026

### **New online publication approach**

Before 1 October 2026, SMS used recognisable pupil images on school social media and in online promotional materials where the relevant permission had been recorded. From 1 October 2026, new content published online will normally avoid images in which pupils can be clearly distinguished or readily recognised.

This is a change in school practice. It does not retrospectively alter the basis on which earlier images were published where the appropriate permission and safeguarding arrangements were in place. This policy applies to images selected for new publication from 1 October 2026 onwards.

## 3. Photograph permission

Photograph and image permission is sought from parents/carers through the school referral/admission paperwork and recorded by the school. Staff must check the recorded permission before using a pupil image for a discretionary purpose.

The wishes of the young person must also be respected. A pupil who does not wish to be photographed, or does not want a particular image used, should not normally be included even where parental permission has been provided.

Parents/carers may change or withdraw permission by contacting the school. The school will stop future discretionary use covered by that permission and, where relevant, remove school-controlled online material when consent is the lawful basis for publication.

## 4. How photographs may be used

Where the appropriate permission is in place, photographs may be used offline or within controlled school communications for purposes such as:

- pupil reports, learning records and portfolios;
- evidence of educational, vocational, enrichment or pastoral activities;
- internal school displays and celebration boards;
- certificates, presentations and records of achievement;
- newsletters, updates or information shared directly with parents/carers;
- internal quality assurance, staff training or review activity where appropriate; and
- other legitimate educational or pastoral purposes connected with the pupil's provision.

## 5. Website, social media and public online material

From 1 October 2026, the school will normally use online images in a way that means pupils are not clearly distinguishable or readily recognisable. This includes the school website, school social media accounts and online promotional or marketing material.

Suitable approaches may include photographs of activities or work rather than faces, images taken from behind, distance shots, careful cropping, or other presentation that reduces ready identification.

A clearly recognisable image may exceptionally be used online where there is a clear and specific reason to do so, the recorded permission covers that use, the pupil's wishes have been considered, and safeguarding and data protection checks identify no reason the pupil should not be publicly identifiable.

The school will not routinely publish a pupil's full name alongside their photograph.

## **6. Photographs will not be used**

The school will not knowingly use a pupil image:

- contrary to the permission or restriction recorded for that pupil;
- where publication could create a safeguarding, welfare or privacy risk;
- in a way that could reasonably cause embarrassment, distress, ridicule or harm;
- to disclose confidential information about SEND, health, care status, safeguarding circumstances or other private information;
- on staff personal social media accounts or for staff members' personal publicity;
- for a materially different purpose that is not covered by the recorded permission without first checking the lawful basis and, where required, obtaining further permission; or
- in a misleading, inappropriate or exploitative context.

## **7. Taking, storing and sharing images**

Images taken for school purposes must be handled securely. Staff should use school equipment and approved school systems wherever possible. Personal devices should not be used to take or store pupil photographs unless this has been explicitly authorised and the images are transferred and deleted in accordance with school procedures.

Images must only be shared with people or organisations where there is a legitimate school purpose and the sharing is consistent with the recorded permission, applicable lawful basis and safeguarding requirements. Images will be retained and disposed of in line with the school's records retention and data protection arrangements.

## **8. Safeguarding takes priority**

Photograph permission never overrides safeguarding. Staff must not publish an identifiable image of a pupil who should not be publicly identified, including where there is a safeguarding concern, legal restriction or other known risk. Where staff are unsure, the image must not be published until advice has been obtained from the Designated Safeguarding Lead or Data Protection Lead.

## **9. Responsibilities and review**

All staff are responsible for checking permission and applying this policy before using or sharing pupil images. Staff who manage school websites, social media or publicity must apply the online publication approach set out above to all new content from 1 October 2026.

The Head Teacher is responsible for oversight of this policy. It will be reviewed annually, or sooner if there is a significant change in law, guidance, technology or school practice.

## **10. Related policies and guidance**

- SMS Data Protection Policy and Pupil/Parent-Carer Privacy Notice;
- SMS Safeguarding and Child Protection Policy;
- SMS Online Safety Policy and Staff Code of Conduct;
- UK GDPR and the Data Protection Act 2018, as amended;
- Department for Education: Data protection in schools - Taking and using photos and videos, and using CCTV in schools; and
- Keeping Children Safe in Education 2026.