



Use of Pupil Images & Consent Policy and Guidance for Schools 2026-2027

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1. Core principles

Images of pupils are personal data where a child can be identified and must be handled in line with UK GDPR and safeguarding expectations. Schools must be clear about how images will be used, ensure a lawful basis exists, and in line with children's best interests and reasonable expectations.

2. When consent should be captured

Consent must be obtained on entry to any setting, including nursery, primary school and secondary school. Consent must be in place before any image is used for websites, social media, promotional material or press/media.

3. Key stage and transition points

Consent should be reconfirmed or refreshed at the following transition points:

- Early Years / Nursery: on entry to nursery or pre-school provision
- Transition from nursery to Reception (school-based EYFS)
- Primary phase: Reception to Key Stage 1 (if consent not refreshed at entry)
- Primary phase: Key Stage 1 to Key Stage 2 (end of Year 2 / start of Year 3)
- Secondary phase: Year 6 to Year 7 transition
- Secondary phase: Key Stage 3 to Key Stage 4 (end of Year 9 / start of Year 10)

4. When consent must be refreshed

- The purpose of use changes
- The audience expands
- The nature of use changes significantly (for example, routine updates to press or recruitment campaigns)

5. Annual good practice

Schools should issue an annual reminder to parents and provide a simple route to update or withdraw consent.

Consent may remain valid for the duration of time at the school if the purpose remains unchanged.

6. Re-use and re-sharing

Images must not be reused, repurposed or re-shared unless the original consent clearly covers that use.

Public availability, including on social media, does not remove this requirement.

7. Safeguarding requirements

- Avoid using full names alongside images
- Do not include sensitive identifying information
- Always consider safeguarding restrictions such as court orders or looked-after status
- Ensure images are appropriate, respectful, and taken in safe, supervised contexts

Storage and audit

- Maintain a central record of consent
- Ensure staff check consent before use
- Store images securely and restrict access
- Delete images when no longer required
- Be able to evidence what consent was given, what it covered, and when it was obtained

8. Withdrawal of consent

Parents (and where appropriate pupils) must be able to withdraw or amend consent at any time.

Schools must act promptly, stop further use where applicable, and update records centrally.

9. Summary

Consent should be captured on entry (including nursery), reconfirmed at key transition points, and refreshed where use changes.

Public availability does not remove the need for consent, and safeguarding considerations must always take priority.

10. Taking and Using Images Safely (Enhanced Guidance for Schools)

10.1 Why this matters (AI risk context)

The risk profile of pupil images has changed significantly. Images shared online can be copied, manipulated and reused using artificial intelligence (AI) tools, including in ways that are harmful or abusive.

This may include images being scraped from school websites or social media and reused without consent, images being altered or manipulated, and potential use in blackmail or wider safeguarding incidents.

Protecting pupil images is therefore not only a data protection issue but a safeguarding responsibility.

10.2 Key principle for schools

Schools should take a risk-based approach, balancing celebration of pupils with minimising unnecessary exposure.

The key consideration is not whether images are used, but how identifiable and reusable they are.

10.3 How to take images safely (practical expectations)

When capturing images, staff should actively reduce the risk of misuse.

Image composition

- Avoid close-up, face-on images where pupils are easily identifiable
- Prefer group shots rather than individual close-ups

- Prefer images taken from a distance
- Consider over-the-shoulder or side-profile angles where this still meets the communication purpose
- Consider whether the image would still be effective if the pupil were not clearly identifiable

What to include / exclude

- Do not capture full names displayed on badges, exercise books, wall displays or certificates
- Do not include school timetables, room signs, locations or routines in the background where avoidable
- Do not include identifiable contextual details that could increase risk, for example information about vulnerability, support needs, or regular attendance patterns

Context and dignity

- Ensure all images are appropriate and respectful
- Ensure images show pupils in safe, supervised environments
- Do not use images that place pupils in potentially vulnerable, embarrassing or compromising situations, even if consent has been provided

10.4 How to use and publish images safely

Reducing identifiability

- Avoid pairing pupil names with images, especially online
- Avoid captions that enable identification
- Use general descriptors such as "Year 5 pupils", "children taking part in science", or "students involved in enrichment activities"

Use safer image types where appropriate

- Consider images with faces partially obscured
- Consider blurred or lower-resolution images where suitable
- Consider images focused on activity rather than individuals, for example hands working, wider classroom shots, or pupils viewed from behind
- Add a water mark to the image

Resolution and quality

- Use lower-resolution images online where possible.
- Avoid uploading high-definition images where a lower-quality version would achieve the same purpose.
- Retain tighter control over original high-resolution files and limit internal access to those who need it

10.5 Technical measures to reduce misuse

Metadata removal

- Remove image metadata (EXIF data) before publishing

- Be aware that metadata may reveal location, date and time, and device information
- Recognise that this may unintentionally reveal routines, patterns or locations

Platform controls

- Apply appropriate privacy settings on social media and digital platforms.
- Where possible, limit who can view or share content
- Disable downloads or reuse features where platform settings allow this

Access control

- Restrict access to original image files to authorised staff only
- Avoid storing pupil images on unsecured personal devices
- Ensure shared drives, folders and cloud locations are permission-controlled

10.6 What schools should avoid

- Publishing large galleries of identifiable pupils without clear educational or communications need
- Repeated use of the same pupil images across multiple public platforms
- Open-access folders or downloadable image banks
- Any image use where safeguarding risks have not been actively considered

10.7 Embedding good practice in systems and culture

Staff awareness

- Ensure staff understand the risks of AI image manipulation
- Ensure staff understand how images can be misused once published online. Ensure staff understand their responsibility when taking, storing and sharing images of pupils

Policies and procedures

- Reflect this guidance within safeguarding, online safety and data protection procedures
- Ensure local website and social media practice is consistent with the consent position and safeguarding risk assessment
- Review image use periodically rather than assuming historic practice remains acceptable

Consent process

- Ensure consent forms explain where images may be published and the broad types of use anticipated
- Ensure consent wording reflects modern online risks, including online sharing and onward reuse by third parties
- Ensure clear processes exist to withdraw consent and remove images promptly where required

10.8 If an image is misused or suspected to be misused

- Treat the matter as a safeguarding concern

- Preserve evidence such as screenshots, links and relevant correspondence
- Inform the Designated Safeguarding Lead immediately
- Follow safeguarding, reporting and incident management procedures

10.9 Simple checklist for schools

- ☐ Consent is in place and is appropriate for the intended use.
- ☐ The pupil is not more identifiable than necessary for the purpose
- ☐ No sensitive or identifying information is visible in the image or background
- ☐ The image is appropriate, respectful and contextually safe
- ☐ Metadata has been removed where the image will be published online
- ☐ The platform, audience and access settings are appropriate

11. Final principle

Schools should prioritise minimising identifiability, limiting reuse, and maintaining control over images, recognising that once images are published online, they may be copied or manipulated beyond the school's control.

Appendix: source note

This version incorporates enhancements informed by national education-sector guidance on protecting settings' images from AI manipulation and abuse, alongside existing DMAT consent, safeguarding and data protection principles.

Appendix 1

Pupil Image Use – Staff Quick Checklist

Before taking a photo

- Consent is in place for the pupil(s)
- No safeguarding restrictions apply
- You understand where the image may be used

When taking photos

- Avoid close-up, face-on identifiable images
- Use group or distance shots where possible
- Avoid capturing names, badges, or sensitive information
- Ensure images are respectful and appropriate

Before publishing

- Do not pair names with images
- Check background for identifying details (e.g. displays, timetables, locations)
- Use general captions (e.g. "Year 5 pupils")
- Use lower-resolution images where possible
- Add a water mark

Technical checks

- Remove metadata (location/time/device info)
- Apply correct platform privacy settings
- Ensure images are stored securely
- Limit access to authorised staff only

Stop and review if unsure

- Would I be comfortable if this image was widely shared?
- Could this pupil be easily identified?
- Does this increase risk in any way?
- Have I checked consent and safeguarding status?

If something goes wrong

- Report immediately to the DSL
- Preserve evidence (screenshots/links)
- Do not attempt to resolve independently

Key principle: Minimise identifiability, limit reuse, and maintain control. Once images are online, they may be copied or misused beyond the school's control.

Appendix 2

Consent form to be used for all Durrington Multi Academy Trust schools to obtain Consent for the use of photographs and video images of pupils



DURRINGTON MULTI ACADEMY TRUST

Consent for the Use of Photographs and Video Images of Pupils

1. Introduction

At Durrington Multi Academy Trust and its schools, we use photographs and video images to celebrate achievement, support learning and communicate with our communities. All images are processed responsibly and in line with data protection and safeguarding requirements. The lawful basis for this processing is public task.

2. What this consent covers

By providing consent, you agree that photographs and/or video images of your child may be taken and used by Durrington Multi Academy Trust and any school within the Trust for the purposes set out below.

3. How images may be used

1. Educational and internal use

- Displays within school
- Classroom and learning records
- Staff training and professional use

2. School communications

- School website and newsletters
- Parent communications

3. Trust communications

- Trust/School websites and publications

4. Public and promotional use

- Social media (including re-sharing school content)
- Prospectuses, brochures, recruitment campaigns
- Displays outside school

5. External media

- Press and media coverage
- External publications or partners

Images may be presented or displayed digitally or in print. All use will be appropriate, proportionate and in line with safeguarding and data protection requirements. Images may be of single pupils or groups of pupils and will include images of pupils faces.

4. Safeguarding and responsible use

- Full names are not used with images
- Sensitive information is not included
- Images are stored securely and used appropriately

5. Duration of consent

This consent remains valid while your child attends a Trust school unless withdrawn. We will remove any image within thirty days of notice being given. Images may continue to be used after a pupil leaves if taken under valid consent and still appropriate.

6. Your rights

You may withdraw or amend consent at any time by contacting the school. Requests will be actioned promptly where reasonably practicable.

7. Giving consent

☐ I GIVE consent for Durrington Multi Academy Trust and its schools to use images as described above.

☐ I DO NOT GIVE consent for Durrington Multi Academy Trust and its schools to use images.

8. Details

Child's name: _____

School: _____

Parent/carers name: _____

Signature: _____

Date: _____