



Use of Digital and Video Images Policy

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Blackpool Gateway Academy: Online Safety & Data Protection Policy 2026

1. Aims and Scope

This policy ensures that Blackpool Gateway Academy meets its statutory obligations for the safe use of digital technology and the protection of personal data. It protects pupils and staff from digital harm and ensures the academy handles information according to the latest UK legal standards.

2. Legal Framework

This policy is based on the following current legislation and guidance:

- The Data (Use and Access) Act 2025 (DUAA)
- The Data Protection Act 2018 (DPA 2018)
- UK General Data Protection Regulation (UK GDPR)
- Keeping Children Safe in Education (KCSIE) 2026
- The Computer Misuse Act 1990

3. Data Protection Principles (The 7 Pillars)

In accordance with the **DUAA 2025**, the academy ensures all personal data is:

1. **Lawful, Fair, and Transparent:** processed under a clear legal basis (usually 'Public Task').
2. **Purpose Limitation:** collected for specific school functions and not used for other reasons.
3. **Data Minimisation:** we only collect the minimum amount of data required.
4. **Accuracy:** kept up to date; inaccurate data is erased or rectified immediately.
5. **Storage Limitation:** retained only as long as necessary (refer to our Retention Schedule).
6. **Integrity and Confidentiality:** protected by encryption, strong passwords, and secure servers.
7. **Accountability:** the academy maintains a **Record of Processing Activities (ROPA)** to prove compliance.

4. Digital Images and Video

- **Legal Basis:** the academy uses 'Public Task' for internal administrative images. For marketing, social media, or press, explicit affirmative consent is obtained annually.
- **Equipment:** staff must only use academy-owned devices to record images. Personal mobile phones are strictly prohibited for taking photos of pupils.
- **AI and Deepfakes:** in line with 2026 safeguarding updates, the academy strictly prohibits the use of pupil images to generate AI content. Any attempt to create or share non-consensual AI-generated images (deepfakes) will be treated as a serious safeguarding breach and reported to the police.

- **Parental Use:** parents are requested at all school events not to record school events due to children who do not have photo permissions participating in these events.

5. Information Rights (Subject Access Requests)

- Under the Data (Use and Access) Act 2025, individuals have the right to access their data.
- Requests will be responded to within one calendar month.
- The academy may refuse requests that are 'manifestly unfounded or excessive' or where the search required would be 'unreasonable or disproportionate.'

6. ICT Acceptable Use Policy (AUP) Summary

- **Authorised Access:** users must only use their own allocated accounts and passwords.
- **Cyberbullying:** the academy has a zero-tolerance approach. A single act of online harm is treated as a repeated offense due to the 'continuous' nature of digital content.
- **Filtering and Monitoring:** the academy employs appropriate filtering and monitoring (as defined by KCSIE 2026) to block harmful content and alert the DSL to risks including self-harm, radicalisation or grooming.
- **Personal Devices:** pupils are not permitted to use personal mobile devices on site unless specifically authorised for a medical or SEND requirement.

7. Data Security and Breach Management

- Sensitive data must be encrypted if transferred electronically.
- Any loss of personal data (a data breach) must be reported to the Data Protection Officer (DPO) immediately.
- If the breach poses a risk to individuals, the academy will notify the Information Commissioner's Office (ICO) within 72 hours.

8. Monitoring and Review

This policy is reviewed annually to reflect the fast-moving nature of digital technology and data law.
Next Review Date: September 2027

Appendix 1: Pupil & Parent Consent Form (2026 Update)

Student Name: _____ Date: _____

1. **AUP Agreement:** I agree to follow the school ICT rules and understand that my digital activity is monitored for my safety. []
2. **Web/Social Media Consent:** I consent to my child's image being used on the school website and official social media platforms. []
3. **Digital ISP Access:** I consent to the use of digital platforms to host my child's Individual Support Plan (ISP) in line with 2026 SEND reforms. []

Parent Signature: _____