

# Safe, Responsible Streaming in Schools -- Guidance for HMC, GSA, ISBA and PADSIS Members

## Content Capture, Streaming, Video Distribution: The Opportunity and the Responsibility

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Live streaming and digital recording are now a normal part of school life. From sports fixtures and performances to assemblies and awards ceremonies, schools are increasingly sharing moments of pride and achievement with parents, alumni, and wider communities who cannot always be present in person. When done well, streaming strengthens engagement, celebrates young people, and builds lasting connections across the school community.

At the same time, the digital world brings new responsibilities. Schools are custodians not only of children's education but also of their safety, dignity, and personal data. As more content is captured and shared online, school leaders must think carefully about safeguarding, privacy, and long-term risk; just as they do for any other aspect of pupil welfare.

HMC, GSA, ISBA and PADSIS recognise our responsibility to support members with clear and trusted guidance in this rapidly developing area. This document, whilst not replacing professional legal advice, represents a first step towards greater signposting and shared understanding.

We would like to thank SOCS and the streaming platform Joymo, for their support and input in helping to draft this guidance, drawing on their practical experience of digital systems and secure streaming within the UK independent school context.

## The Principles That Should Guide All School Streaming

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When schools film, record, or live-stream pupils, the decisions involved are not merely technical or operational; they encompass safeguarding, governance, and leadership responsibilities. The principles below set out the standards that HMC, GSA, ISBA and PADSIS urge schools to expect of themselves, their staff, and any external providers. The intention is that the list below provides a practical framework for assessing whether a streaming approach is safe, compliant, and appropriate for an educational environment.

HMC, GSA, ISBA and PADSIS encourage schools not to shy away from streaming: when done properly, it enhances pupil experience, deepens parent and community engagement, and reflects the realities of an increasingly digital world. However, it must be approached with the right understanding, safeguards, and partners in place. Schools should also ensure that their approach to streaming is consistent with their existing safeguarding and data protection policies, and in particular with any policy covering the use of images of children.

## 1. Safeguarding must be a top priority

Filming and streaming must never compromise a child's safety, dignity, or wellbeing. Schools must ensure no pupil is shown in distress, vulnerable situations are never broadcast, and safeguarding concerns can always override the broadcast.

## 2. Lawful basis for processing personal data and pupil protection

The safeguarding aspects of streaming include the risk of privacy impact on children. This should form part of any risk assessment, perhaps as part of a data protection impact assessment (DPIA).

Whilst considerations may be given to the potential application of certain exemptions to data protection law (see Appendix 1), as a starting position Schools must consider the legal basis under UK GDPR by which they process images/ content (and other related personal data), alongside what parents and pupils are told about these uses.

Under the UK GDPR, organisations need a lawful basis for processing personal data. The organisation's privacy notice needs to explain these, alongside the purposes of the processing. Schools should also consider if there are other touchpoints where further privacy information can or should be provided in relation to streaming specifically. On a related note, the venues where filming occurs must have clear signage for physical attendees.

Whilst it is for each school to decide which lawful basis or bases apply (seeking independent legal advice as appropriate), HMC, GSA, ISBA and PADSIS consider that:

- (i) although image "consent forms" are likely to play a relevant role in how schools process pupil image data, as a lawful basis under UK GDPR consent may not always be necessary or practical to rely on; and
- (ii) conducting a data protection impact assessment and/or legitimate interests assessment (see Appendix 2) is likely to be an appropriate step for any school considering streaming events.

Schools should note that individuals generally have the right to object to processing on the basis of legitimate interest – subject to any relevant exemptions or overriding interests.

We explore these technical legal issues further, along with practical guidance on compliance with data protection law, in the Appendices to this note.

### ***Attendees from other schools and live streaming by other organisations***

Schools will also need to take account of attendees from visiting schools (e.g. the opposition team in a sporting fixture). Again, direct consent is unlikely to be workable. As part of its LIA/DPIA for live streaming events, a school should consider how visiting pupils and their parents will be made aware of the live streaming in advance and any additional safeguards that may be required.

A school's privacy notice would ideally specifically refer to live streaming by a pupil's own school (where this takes place) but also to the possibility that the pupil may play a fixture or attend an event at another school which that school may live stream.

When visiting another school, the visiting school should ask the host school for details of any arrangements for filming and streaming. The visiting school should check that the risk mitigations the host school has put in place broadly reflect the contents of this guidance

document and/or the visiting school's own approach to filming and streaming as understood by its pupils and parents (where applicable). Where possible, details of the host school's policy and/or privacy notice should be provided to participating pupils and their parents in advance.

When attending events hosted by a third-party organisation, such as regional or national festivals or competitions, schools should ensure participants and parents are aware of any filming or photography that will take place. It is possible that more high-level sports and cultural events may be covered by an exemption for arts and sports broadcast journalism (see Appendix 1).

### **3. Delayed broadcasts, not real-time exposure**

Wherever possible, and ideally by default, a delayed-live feature (for example two minutes) should be implemented so that sensitive or inappropriate moments can be removed before they reach viewers.

### **4. Control is critical for schools**

Schools must be able to stop a stream instantly and/or remove content immediately. This should be doable both pitchside or at the venue and remotely. The School should also be able to decide who can access recordings. If a school cannot exercise full control over its filming, data, content, and video rights, it is not a safe system.

### **5. Where the footage is stored matters**

Video footage of children is likely to be personal data in this context. It should be stored securely, encrypted, and in compliant locations (the UK), not scattered across devices, hard drives, USB sticks, or unmanaged online accounts.

### **6. Public platforms are not designed for schools**

Advertising-driven platforms such as YouTube, Facebook or TikTok are built for mass distribution and data tracking and commercialisation – not for child protection, lawful processing of data, data management, or school governance.

### **7. Access should be controlled**

It should be a choice whether the filmed content is accessible only to authenticated users, such as parents, staff, or alumni, or more widely broadcasted (though open access will require stronger justification than restricted access when it comes to the LIA or DPIA). Our recommendation is that live streaming should generally be restricted access by default with public broadcasting on an exceptional basis where there is a good justification for wider dissemination. Schools should be able to see who has viewed content and revoke access at any time, including on request where safeguarding or data protection concerns arise.

### **8. All activity should be auditable**

Schools should be able to identify those who streamed content, and review what happened if something went wrong. Transparency protects both pupils and staff.

### **9. Staff and operators must be trained**

Anyone filming or streaming in a school environment should be DBS-checked and trained in safeguarding and digital responsibility.

## 10. Policies must align with KCSIE and Data Protection Legislation

Streaming is not separate from safeguarding or UK GDPR; it is part of it. Schools should ensure their digital activity is aligned with their child protection, online safety, and data protection responsibilities and policies. In particular schools should check compatibility with any policy they have on the use of images of children<sup>1</sup> (and related consent forms) and the content of any privacy notices for parents and/or pupils.

## 11. Every school must have named senior responsibility for streaming and digital safeguarding

Schools should ensure that responsibility for streaming sits clearly with their Designated Safeguarding Lead (DSL) and/or their Data Protection Officer (DPO) or equivalent senior leader. Streaming should not be viewed solely as a technical or media activity, it should be embedded within the school's wider safeguarding and data protection framework, with clear ownership, oversight, and escalation pathways.

## 12. Schools should work with suppliers who put safeguarding, privacy, and children's rights ahead of technology or commercial interests

Schools should not adopt platforms, cameras, or services that prioritise automation, AI, data capture, or commercial exploitation over child protection, lawful processing, and school control. Schools should always retain ownership of their video content and data and must not agree to terms that put the above at material risk.

It is the responsibility of individual schools to carry out appropriate due diligence in respect of any specific product but we recommend checking as a minimum that contractual arrangements and pre-contractual due diligence are clear regarding:

- who will be the data controller(s), and if there are multiple data controllers (eg the school and the provider) then will that be on a joint controller or independent basis (*NB - if any party will be a data processor then a data processing agreement will be required*);
- where the data will be processed and what measures are in place to protect it;
- technical controls e.g. access control / a delay function to live-moderate the broadcast / protection from unauthorised recording or downloading;
- vetting and training for provider staff involved in filming.

## 13. Streaming arrangements should be reviewed against KCSIE on a regular basis

Schools and their streaming providers should regularly audit their platforms, processes, and policies against KCSIE, online safety guidance, and data protection law to ensure that safeguarding remains effective and streaming activity remains compliant as technology and usage evolve.

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<sup>1</sup> There is a template [Taking, Storing and Using Images of Children Policy](#) and a template [Privacy Notice](#) in the ISBA reference library.

## Leadership and Support - HMC, GSA, ISBA, PADSIS together with SOCS and Joymo - Working Together to Set the Standard

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HMC, GSA, ISBA and PADSIS are taking an active leadership role in this space and have engaged with SOCS and Joymo during the development of this document. Thanks also go to Owen O'Rorke at Farrer & Co for his assistance.

Schools seeking further guidance may contact HMC, GSA, ISBA, PADSIS, SOCS or Joymo.

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## Appendix 1: Data Protection

### Consent

Consent is one of the six lawful bases for processing personal data. However, it has strict requirements and can be difficult to rely on unless circumstances are appropriate.

Consent must be:

- **freely given** (the individual must have real choice and control, i.e., they must be able to refuse without detriment);
- **specific** (consent must relate to *clear, explicit purposes*);
- **informed** (the consent request should include the following information: (a) the identity of the controller; (b) what data is processed; (c) how and why it is used; and (d) the right to withdraw consent at any time); and
- **unambiguous** (demonstrated through a clear affirmative action - opt-in boxes, written statements, or clear actions count; silence, inactivity, or pre-ticked boxes do not).

Relying on consent carries risk for the following reasons:

- Consent can be withdrawn at any moment, disrupting processing.
- Organisations often cannot meet the “freely given” standard, particularly in the context of a relationship where there is an imbalance of power. Schools would need to consider how to manage issues such as peer / team / parental pressure to consent to streaming.
- ICO guidance notes that you “cannot usually swap from consent” to a different lawful basis later.
- Schools will have to consider the design and implementation of systems for obtaining and recording consent from parents and/or pupils at their own school and any other school(s) participating in the event, and maintain an accurate list of pupils who must not be filmed. Schools will need to consider how to manage this process to avoid inadvertent error and who will take responsibility for this.

Depending on the individual school’s circumstances and ability to address these issues, ‘legitimate interests’ may be a more stable ground to rely upon.

### Legitimate Interests (LI)

LI can apply where:

- the school is pursuing **legitimate** (i.e., genuine, non-speculative) **interests** (e.g., broadcasting school sports for community engagement);
- processing is **necessary** (i.e., a targeted and proportionate way of achieving the stated purpose); and
- the school can show that data subjects’ interests, rights and freedoms **do not override** the legitimate interests of the school (the “balancing test”).

The school would need to carry out and document a Legitimate Interest Assessment (LIA) to determine whether it meets the above criteria and whether LI is the appropriate legal basis. Given that the images in question include those belonging to children, the school would need to be particularly careful to ensure their interests and rights are protected. For the avoidance of doubt, there is no specific requirement in the UK GDPR for you to undertake an LIA. However, in practice you are likely to need an audit trail of your decisions and justification for processing on the basis of LI and it is therefore highly recommended.

## DPIA

Whichever legal basis is determined appropriate, schools should, prior to the processing, consider undertaking a Data Protection Impact Assessment (**DPIA**) to analyse, identify and minimise the data protection risks of their streaming project.

A DPIA is a structured risk assessment required when processing is **likely to result in a high risk to the rights and freedoms of individuals**; this could be relevant to live streaming in schools because it involves minors, potential wide dissemination, and potential safeguarding concerns.

Even if a school takes the view that their streaming project is not likely to result in a high risk to the rights and freedoms of individuals (and therefore a DPIA is not strictly required) any school relying on LI as a legal basis for processing will need to go through a similar risk assessment process as part of the 'balancing test' of their own legitimate interests against the privacy and safeguarding risks to the individual.

Appendix 2 contains some examples of what could be included in an LIA (or form part of a DPIA) The ICO has further guidance and templates here:

- [Legitimate interests | ICO](#) (see link to template at the bottom of the page)
- [Data protection impact assessments | ICO](#)

When considering your approach, it is likely to be the case that:

- The higher the level of competition, the stronger the legitimate interest argument
- The younger the children, the stronger the safeguarding mitigation required
- Open access streaming will require stronger justification than restricted access
- Commercial monetisation may weaken any balancing position.

Using a more comprehensive DPIA provides additional assurance that the organisation:

- considers and increases awareness of privacy and data protection issues at the early stages of the project;
- identifies, documents and addresses risks (e.g., misuse of images, safeguarding concerns);
- records and implements mitigating steps (e.g., restricted access, camera angles, delay buffers);
- provides reassurance for data subjects that their interests are being protected and that any negative impact of processing has been reduced as far as possible;
- demonstrates accountability and compliance with data protection legislation.

Considering and addressing privacy and safeguarding risks at the outset of the project is especially important for youth settings like schools.

## Journalism exemptions

It is possible that some streaming of school events, such as elite sporting events of wider public interest, could fall within the 'journalism exemption' set out in UK data protection legislation. Most commercial sports broadcasts rely on this, even where children are involved; similar exemptions can apply to coverage of cultural and artistic events.

These exemptions apply where personal data is processed with a view to publication, for journalistic or artistic purposes, and the publisher reasonably believes publication is in the public interest (which is not an especially high bar). Where it applies, some data protection obligations will not apply if complying with them would undermine the journalistic purpose; as an example, where the school is relying on legitimate interest the exemption may disapply the right of individuals to be informed and/or to object to the processing.

Although not likely to apply to all school streaming, these exemptions may be engaged at an amateur or U18 level (more so the higher profile the event or tour). As such they could be relevant in some circumstances or may, at least, help inform an impact assessment (when weighing up impact and reasonable expectations of individuals against the public interest).

However, any school seeking to rely on it to disapply data protection obligations will need to be comfortable that the relevant criteria are met. The legitimate interest, or public interest, that schools may have in showcasing pupil events, and/or giving their wider community remote access to them, should never be incompatible with their core priorities: the interests and wellbeing of the child. This includes respecting their data rights.

## Appendix 2: Example Content for LIA

This is provided by way of example only with some suggestions as prompts. Not all prompts will be accurate or relevant for individual schools.

### Live Streaming of School Sporting Events

#### 1. Purpose Test

The school proposes to live stream selected competitive sporting fixtures for the following reasons:

- Promoting participation and excellence in sport
- Showcasing competitive fixtures
- Enabling parents, extended family, alumni, and the wider school community to view events where physical attendance may not be possible
- Maintaining a record of sporting achievement and school history
- Strengthening community engagement and school identity
- Supporting talent development pathways for pupils pursuing elite sport
- Competitive necessity where competitor schools routinely live stream
- Supporting inclusion for families unable to travel due to work, distance, or disability

The purpose is to broadcast the sporting event itself, not to profile individual pupils or exploit their data commercially.

#### 2. Necessity Test

Live streaming is considered necessary because:

- Live streaming provides real-time access to events
- Alternative methods (e.g. written reports or photography) do not provide equivalent access or experience
- It will enable parents and other members of the school community to watch a fixture that they might not be able to attend in person

The processing is limited to what is required to broadcast the sporting fixture.

#### 3. Balancing Test

##### ***Personal Data Processed***

Personal data captured may include:

- Video images of pupils participating in sport
- Names on team sheets or mentioned in commentary
- Scores and performance statistics
- Incidental capture of voices from players or spectators
- Incidental capture of images of spectators

No special category data is intended to be processed but may be captured incidentally (e.g. visible medical support).

##### ***Reasonable Expectations of Participating Pupils***

Live streaming is within the reasonable expectations of participants and their parents because:

- Participation in competitive school sport is inherently public within the school community
- Pupils reasonably expect spectators at matches including those outside the immediate school community (e.g. opposition spectators)
- Elite or national level competitive fixtures will generally have a wider audience including members of the public
- Privacy notices for parents and pupils refer specifically to live streaming of school events

*NB - Pupils are unlikely to expect unrestricted global online access to their fixtures so this is less likely to be reasonable, although the journalism exemptions referred to above may be relevant here. The age of the child and level of performance may also be relevant factors.*

### **Potential Privacy and Safeguarding Risks**

- Wider audience than anticipated due to uncontrolled access to the live stream
- Unauthorised recording, downloading, or redistribution of footage
- Online commentary or misuse of images
- Identification of individual children.
- Risk to pupils subject to court orders or safeguarding restrictions
- Embarrassment to individuals arising from performance or other incidents during filming
- Profiling or unwanted contact

### **Mitigation Measures**

- Access controls
  - Restricting streams to password-protected or authenticated platforms
  - Limiting access to parents, alumni, and school community where appropriate
  - Fully public access only in exceptional circumstances and subject to further risk assessment
- Safeguarding controls
  - School is aware of any 'at risk' pupils who cannot be filmed for safeguarding reasons
  - Opt-out mechanisms available in exceptional circumstances
  - Delay to broadcasting to allow for live moderation and removal of inappropriate footage before it is streamed
  - Disabling, or moderation, of live chat functions
  - Clear mechanism for reporting concerns or requests to remove footage
- Privacy controls
  - Avoiding unnecessary close-ups
  - Avoiding use of full names (where appropriate)
  - Clear privacy notices communicated in advance
  - Clear signage at the venue for attendees informing them of filming
  - Defined retention periods for footage

## **4. Conclusion**

*The outcome of the assessment must be explicitly recorded. E.g.:*

Having considered the purpose, necessity, and risks, and subject to implementation of the safeguards outlined above, the school concludes that its legitimate interests are not overridden by the rights and freedoms of participants.