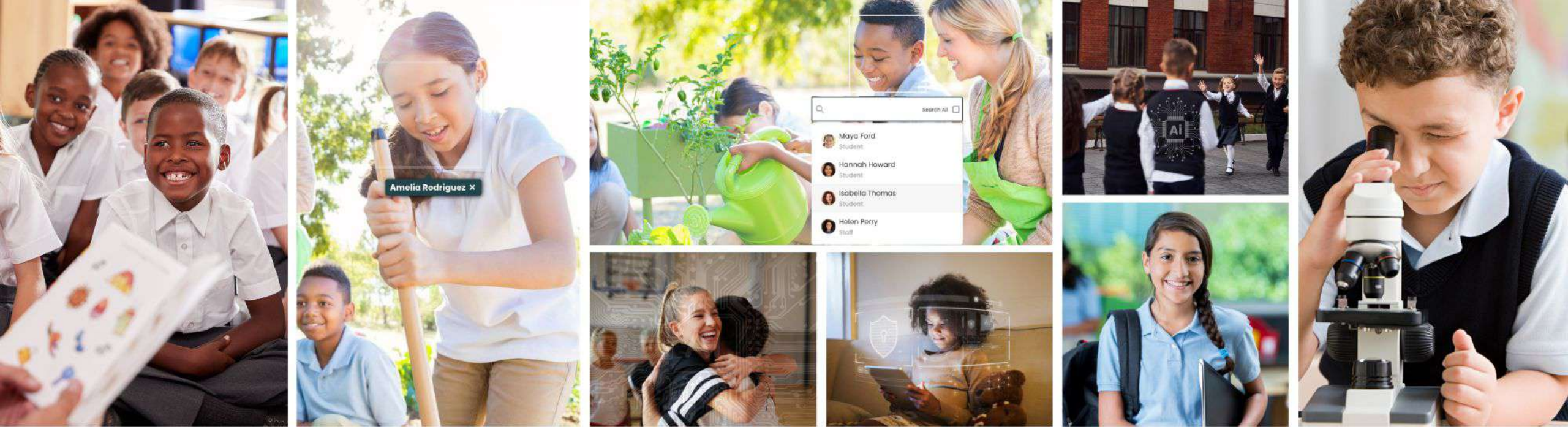


Can Schools Still Safely Publish Student Photos in the Age of AI?

Amelia Vance, President of Public Interest Privacy Center
Reggie Johnson, Chair - PR Society of America, SW District
Mandy Chan, Founder - Vidigami (Moderator)

vidigami

Your photos. Your stories.

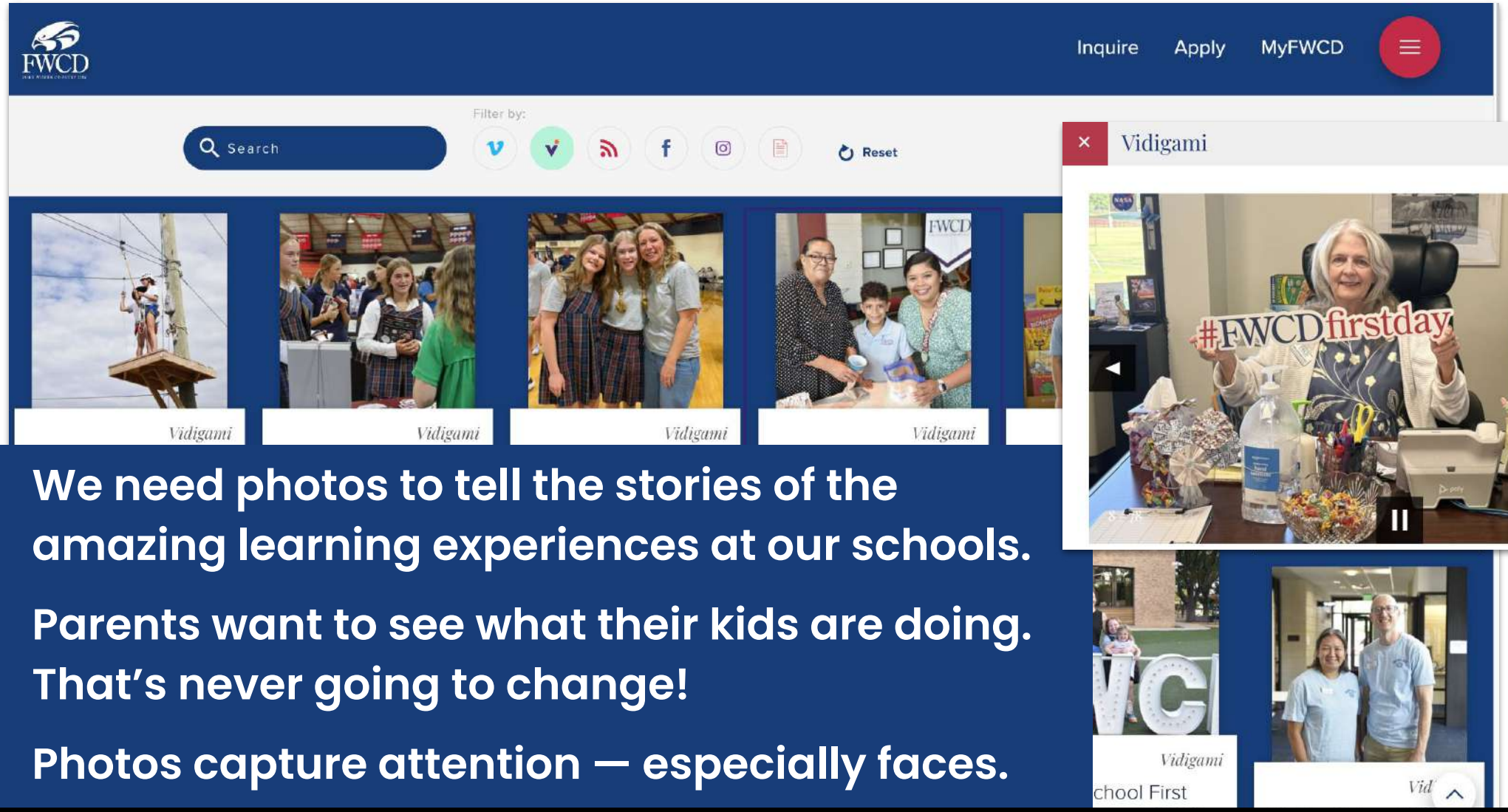
AGENDA

vidigami
Your photos. Your stories.

1. Why are we having this discussion?
2. AI & Photos: The 4 Things AI Changes
3. Responsible AI = Community Governance
4. Q&A



Our Stories Need Pictures



- We need photos to tell the stories of the amazing learning experiences at our schools.
- Parents want to see what their kids are doing. That's never going to change!
- Photos capture attention — especially faces.

Our Stories Need Authenticity



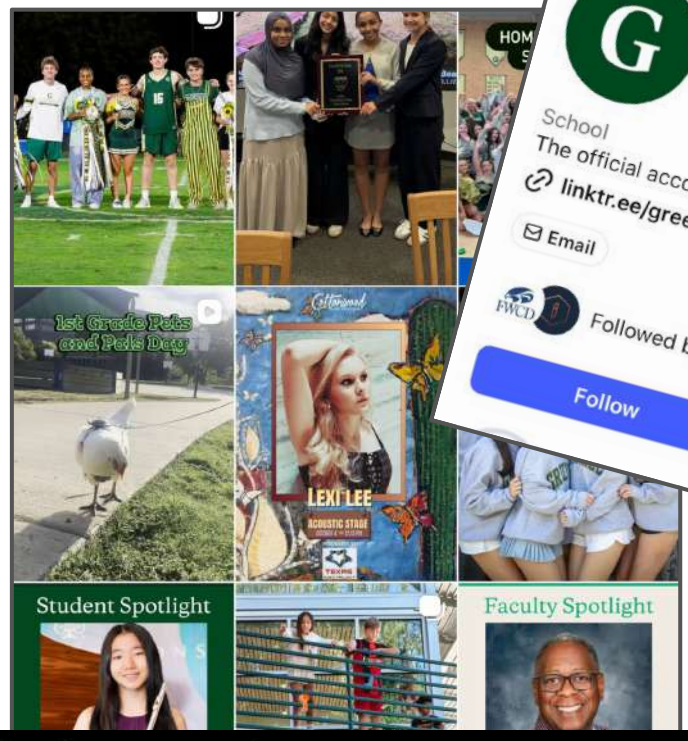
- We need authenticity to build trust and connection.
- Stock photos are generic.
- When AI is used, trust goes down.
- Our brains are wired to identify specific people who matter to us.

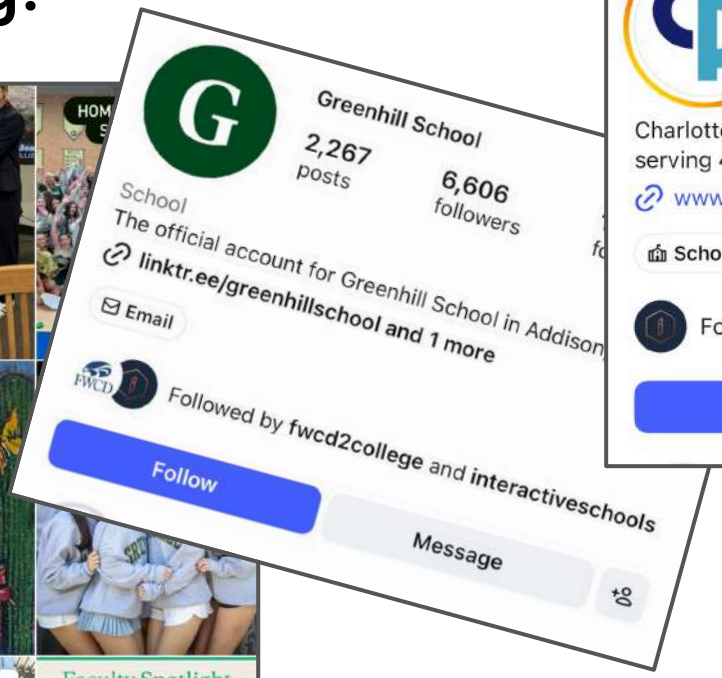
Ethics & Best Practices

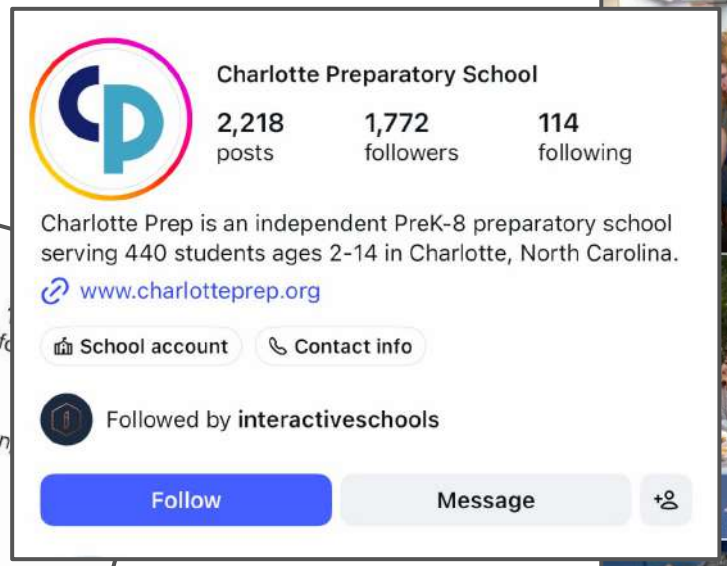
Advocacy	We serve the public interest by acting as responsible advocates for those we represent. We provide a voice in the marketplace of ideas, facts, and viewpoints to aid informed public debate.
Honesty	We adhere to the highest standards of accuracy and truth in advancing the interests of those we represent and in communicating with the public.
Expertise	We acquire and responsibly use specialized knowledge and experience. We advance the profession through continued professional development, research, and education. We build mutual understanding, credibility, and relationships among a wide array of institutions and audiences.
Independence	We provide objective counsel to those we represent. We are accountable for our actions.
Loyalty	We are faithful to those we represent, while honoring our obligation to serve the public interest.
Fairness	We deal fairly with clients, employers, competitors, peers, vendors, the media, and the general public. We respect all opinions and support the right of free expression.

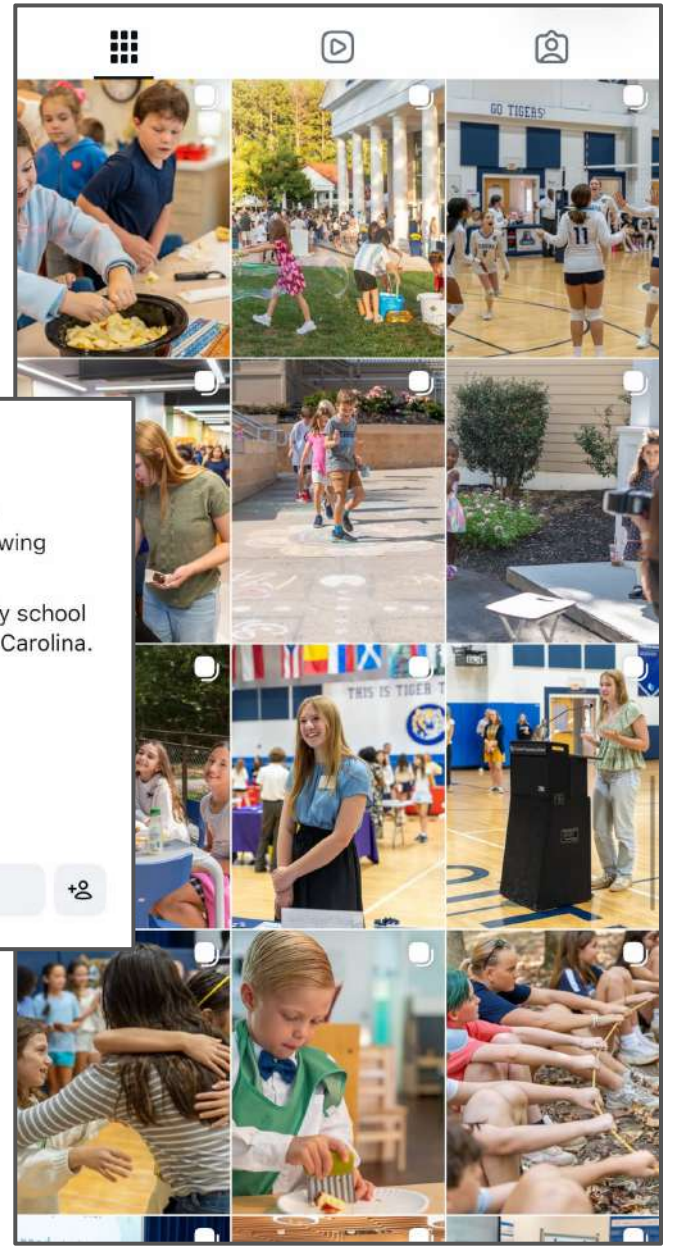
Internal v External Marketing

- We CAN be authentic internally…
- What happens with external marketing?









DEFINING PRIVACY

THE RESPONSIBLE, ETHICAL, AND EQUITABLE COLLECTION, USE, SHARING, AND PROTECTION OF CHILD AND STUDENT DATA

Three Types of Privacy Risks



Perception/Trust

Regardless of Compliance and Harm, how is this data use perceived by the community?



Harm

Is the data use safe, secure, and private?



Compliance

Is the data use in compliance with federal, state or local regulations and policies?

Framework by Jim Siegl

Potential Harms

Parent concerns about photos often go beyond just worries about sharing or possible deepfakes

Health & Safety	Is a stranger or someone dangerous able to communicate with my child or learn where my child lives?
Over-Collection & Over-Surveillance	How much information is being collected about my child?
The Permanent Record	Will my child's mistakes be recorded forever?
Loss of Opportunity	What information will be used to make determine which opportunities my child doesn't have access to?
Equity Concerns	What if the information is biased? What if it is used in an inequitable way? What if my child and I can't or don't have access to the information or technology?
Age-inappropriate Content	Is my child accessing content that isn't appropriate?
Social Harm	Is my child being cyberbullied or stigmatized?
Commercialization	Are companies selling my child's data or targeting advertising to them?

Which Privacy Laws Apply? It Depends. In the US:

Law	Who it covers	What it means for photos
FERPA	Schools that receive U.S. Department of Education funds	A photo can be “directory information,” shared after annual notice and a chance to opt out
State student privacy laws	Varies by state; many cover companies serving schools	Limits on how those companies use student data
State consumer privacy laws	Varies by state; many cover companies serving schools	Requirements and restrictions for companies and non-profits in some states
COPPA	Companies collecting data from children under 13	Separate parental consent before sharing children’s data with third parties to train AI

In the EU, GDPR: A Lawful Basis for Every Photo Use

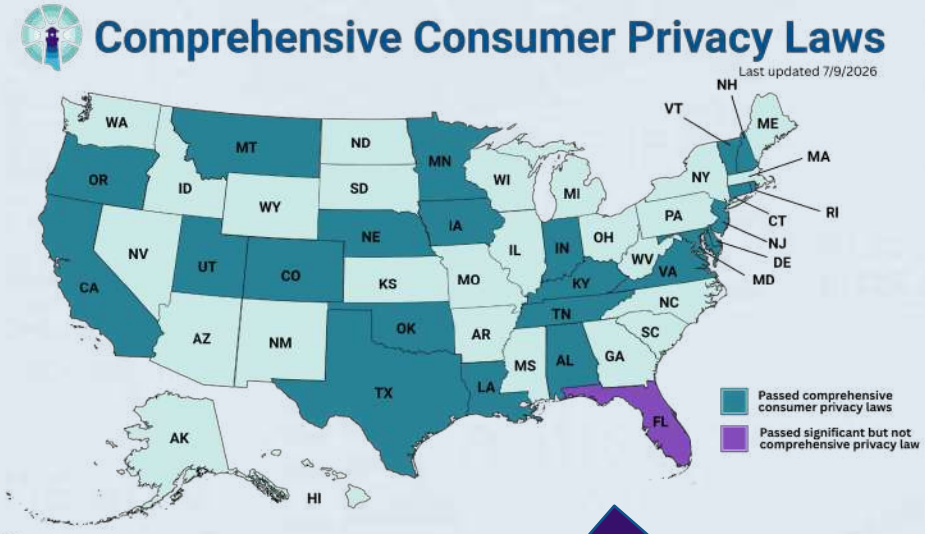
COPPA Rule Changes: Overview

Key Dates

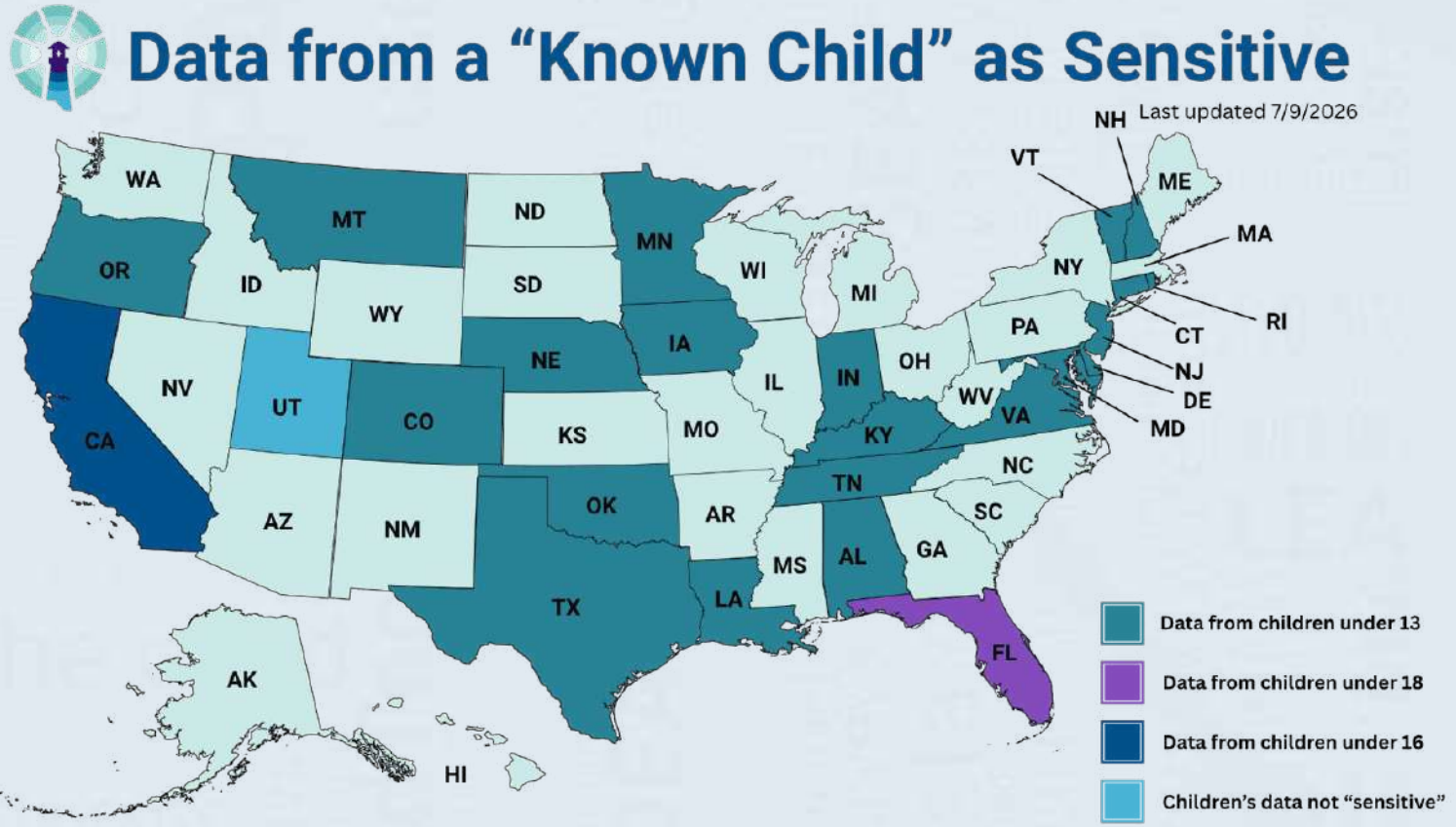
- **April 22, 2025: final rule was released**
- **June 23, 2025: updated rule went into effect**
- **April 22, 2026: Regulated entities must comply**

Key Changes

- **Requiring opt-in consent for disclosures to third parties**
  - Separate parental consent required before data can be disclosed to third parties
- **Limits on data retention**
  - Data cannot be retained indefinitely
- **Definitions update**
  - Mixed audience website or online service added as a separate definition
  - Biometrics and other government-issued identifiers added to the definition of personal information

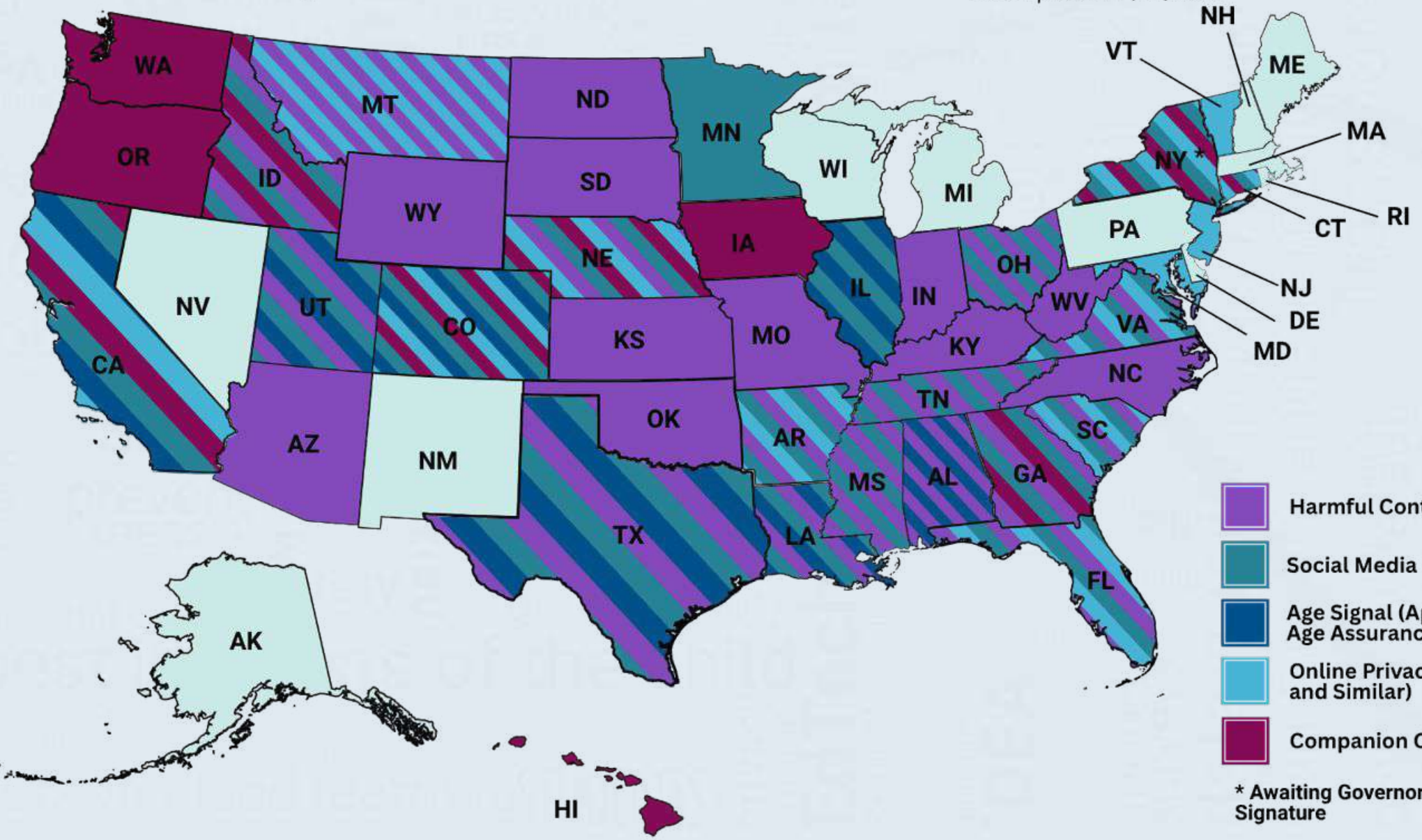

Comprehensive Consumer Privacy Laws
Last updated 7/9/2026
WA
OR
CA
NV
ID
MT
WY
UT
AZ
CO
NM
ND
SD
NE
KS
OK
TX
MN
IA
MO
AR
LA
WI
IL
MS
MI
IN
KY
TN
AL
OH
WV
GA
FL
SC
NC
VA
PA
NY
MD
DE
NJ
CT
RI
MA
VT
NH
ME
AK
HI
Passed comprehensive consumer privacy laws
Passed significant but not comprehensive privacy law

More Laws!


Data from a "Known Child" as Sensitive
Last updated 7/9/2026
WA
OR
CA
NV
ID
MT
WY
UT
AZ
CO
NM
ND
SD
NE
KS
OK
TX
MN
IA
MO
AR
LA
WI
IL
MS
MI
IN
KY
TN
AL
OH
WV
GA
FL
SC
NC
VA
PA
NY
MD
DE
NJ
CT
RI
MA
VT
NH
ME
AK
HI
Data from children under 13
Data from children under 18
Data from children under 16
Children's data not "sensitive"

Laws to Protect Children

Last updated 8/11/2026



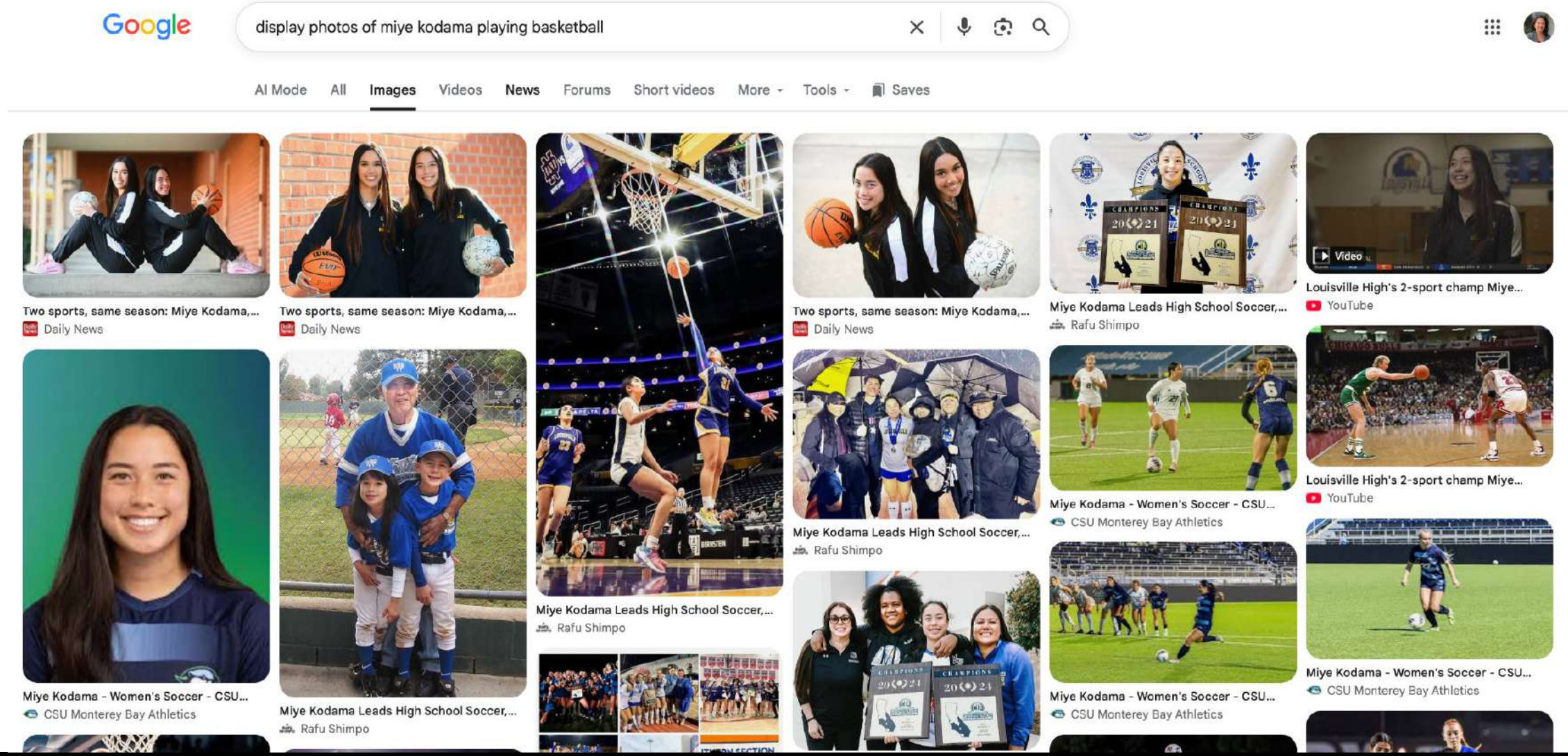
The Complexity with Rights

Right	Typically belongs to	What it governs
Data Privacy	Parent/Guardian/Youth	Information about this person that can be collected, inferred, associated, used, shared, and retained—and for what purpose.
Copyright	Photographer/rightsholder	Who may reproduce, distribute, modify or license the photo
Name Image Likeness rights	Athlete/Student	Whether/how the youth's identity or likeness may be **commercially exploited**
Consent	Parent/guardian, depending on law/use	Authorization for particular uses involving the child
School, Club Platform	Determined by agreements	What the school, club or Vidigami is authorized to do with the media



MJB ~ life of sight photography©

Impact of AI – Recognition & Identification



Impact of AI - Analyzed



AI can extract much more information from an image

Adult woman, approximately 40-50 years old, photographed outside the Lucas Museum of Narrative Art in Los Angeles, holding an orange-red museum bag bearing the message “Inspiring storytellers.” The subject is smiling toward the camera on a landscaped pedestrian walkway, with trees, vegetation and portions of the museum environment visible behind her. The photograph documents a visit to the museum and connects the subject with the museum's focus on storytelling and narrative art.

Setting: Museum visit / cultural event
Location: Lucas Museum of Narrative Art, Exposition Park, Los Angeles, California, USA

Date: 20 September 2026
Themes: Storytelling, narrative art, museum visit, visual culture, personal experience
Visible text: “Inspiring storytellers.” / “Lucas Museum of Narrative Art”
Image dimensions: 1152 × 1536 pixels

Created by: ChatGPT

Impact of AI – Reproduction

Every image becomes raw material for authorized and unauthorized derivative work









Impact of AI - Redistribution

Publication means loss of practical control.



With seconds left in the statewide rugby championship, Pete charged forward. His team trailed by four, and one final score would win it. He broke through the defense, ball tucked tightly under his arm, with nothing but grass between him and victory. Then disaster struck. Max's foot caught in the muddy turf. He stumbled, launched forward, and spectacularly face-planted inches from the line. The ball squirted free. The whistle blew. Game over. His teammates stood stunned—Pete lost the championship. **BUT, this is NOT TRUE. Or, is it?**

AI Risks for School Photos Go Beyond Deepfakes

WHERE A PHOTO WAS TAKEN

“AI can now stalk you with just a single vacation photo”

Vox, June 2025

WHO IS IN A PHOTO

“Reverse-lookup service exposed millions of photos of people’s faces”

Ars Technica/WIRED, Aug 2026

PHOTOS AS TRAINING DATA

“Meta Accused Of Using Photos To Train AI Without Consent”

Law360, Sept 2026

OLD UPLOADS, NEW USES

“Photobucket Can’t Escape AI Training Suit”

Law360, March 2026

TERMS THAT CHANGE

“Meta Now Lets Anyone Use Your Instagram Photos in AI Images—Unless You Opt Out”

WIRED, July 2026 (rolled back after 3 days)

AI-MADE STUDENT IMAGES

“Baton Rouge Students Irked by Use of AI Images in Yearbook”

GovTech, Aug 2026

Open Questions

1. Whether a photo becomes part of a student's education record once software tags the student's face.
2. Whether editing a real student's photo with AI needs new permission from the family.
3. Whether families can keep a school's posts of their child out of AI training, when the school, not the family, holds the account.
4. How long schools should keep large photo archives, and who decides.
5. Whether permissions families gave years ago still cover new uses of old photos.

The Question



Are there technical ways to stop someone from taking publicly available images?

#1 – AI Management – Responsibility & Policy

No Robots (.txt) Ask AI not to use your website data for training; web crawlers don't need to adhere to request.

ChatGPT

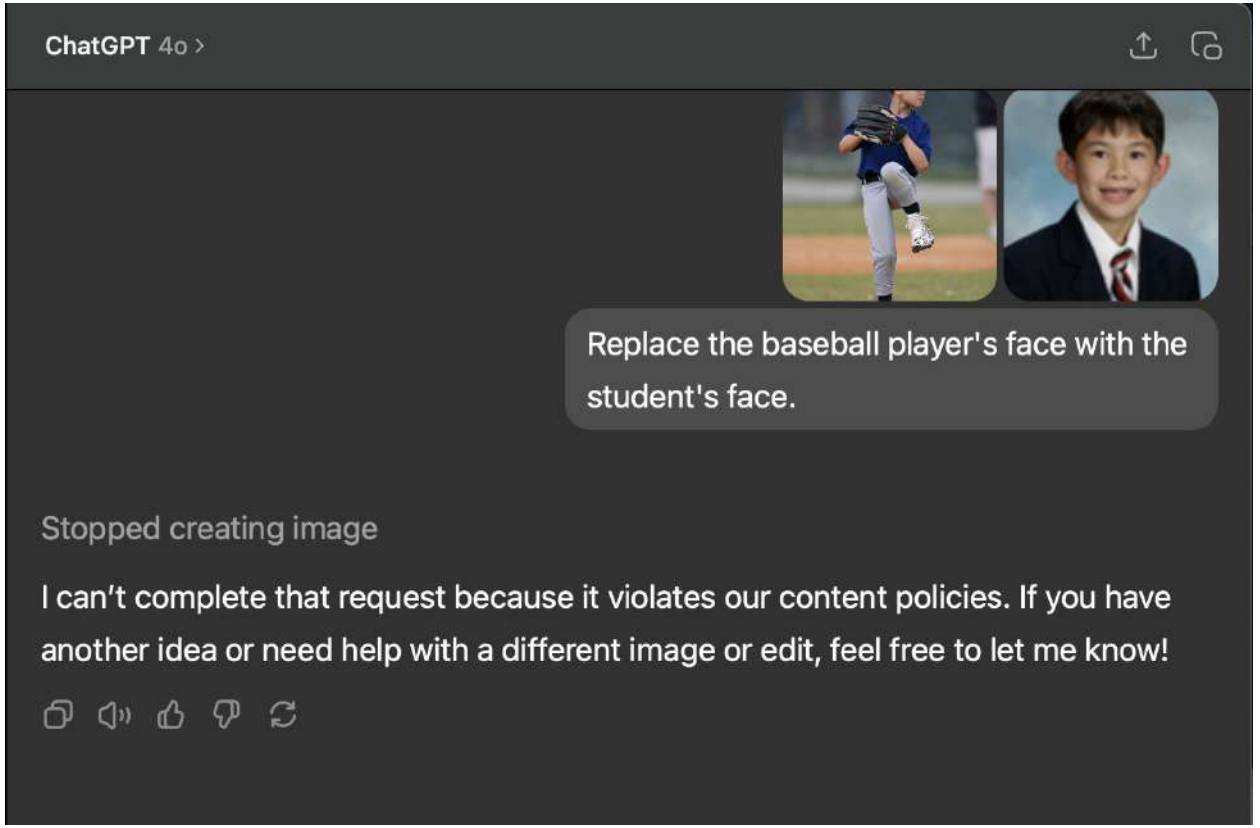
```
User-agent: GPTBot

Disallow: /blog
```

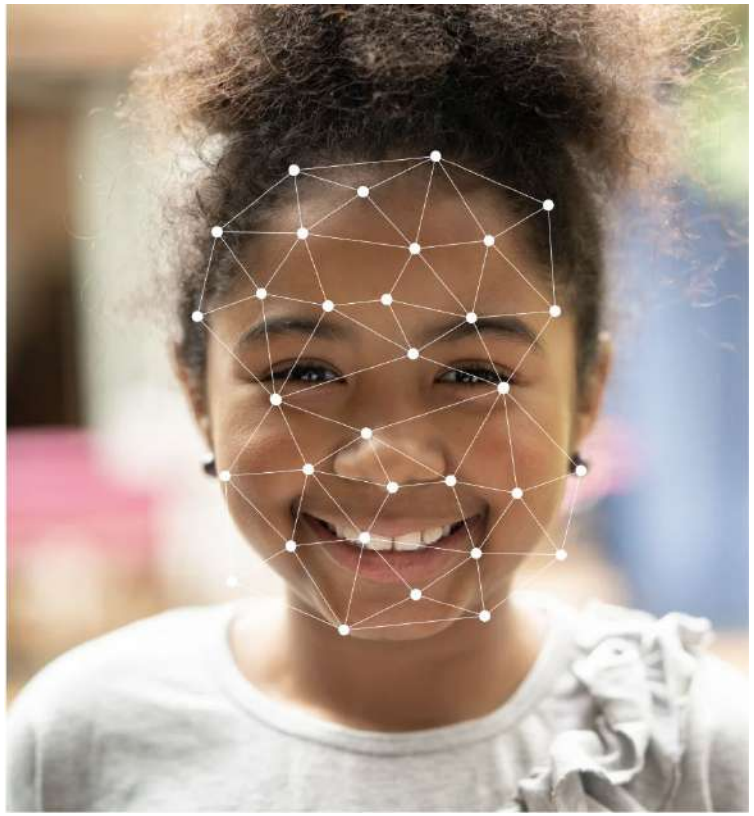
Google Bard

```
User-agent: Google-Extended

Disallow: /blog
```



#2 - AI Management – Technology



Facial Cloaking, Distortion, Spoofing and Masking

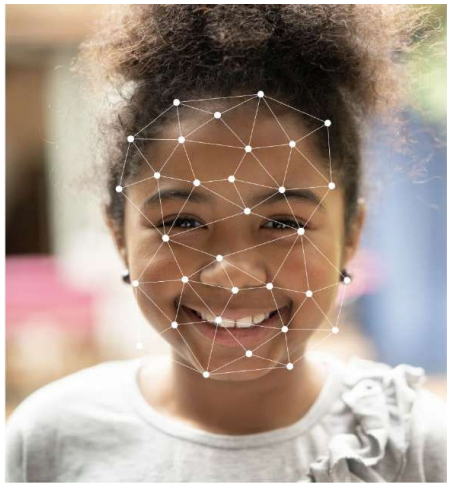
- Introduces subtle artifacts to an image to confuse deepfake software; expect rapid adaptation to techniques designed to prevent them from working.

AI Detection

- Report, does not prevent

#3: Reducing Risk = Reducing AI Usability

1. **Image Composition**
   - Profile or non full-face shots
   - Group images with complex backgrounds - size of the face within a group is small
2. **Image Resolution**
   - Reduce quality - 72 dpi or lower
   - Reduce file size - 200 x 300 pixels (max)
3. **Image Filters and Effects**
   - Blur or mask face
   - Introduce noise
4. **Watermarks**
   - Advisory protection











#4: Reducing Risk = Reducing Exposure



Limit Public Access

- Access controls and passwords can protect images from being easily downloadable by non-members and harvested by bots.



Limit Availability

- Private or expiring content minimizes chances of images being harvested.
- Avoid making images public. Otherwise reduce usability.

Data Minimization Applies to Photos, Too

> **“ The most secure data is the data that schools don’t have.**

	For photos, this can mean
Collect only what you need	Capturing a student’s name with the photo only when there is a reason to
Use it only for its purpose	A class gallery photo is not automatically a marketing photo
Share only what is needed	Smaller images, no location data, and full names only where families have agreed
Keep it only as long as needed	Deciding how long old photos stay online and who can still see them

Role for Contextually Authentic Photos?



Original Photo
(100% Size) 1500x2100



Original Photo - Random Face
(100% Size) 737x1104



AI Generated by
AIFaceswap.io
(100% Size) 1500x2100

Students Outraged after Stanford University uses AI to alter race in photo





AI: Authenticity vs Identity

Application	Primary Concern
AI identifies students in photographs to help enforce consent	Privacy, Identity and Permissions
AI replaces students or alters their appearance in promotional materials	Authenticity, representation and trust
AI helps organize, retrieve and distribute authentic school photographs	Governance, efficiency and community engagement

The Question

How do we ensure authenticity and trust?

- ✓ Preserve the intention and meaning of content
- ✓ Respect the people who created it,
- ✓ contributed to it, and are represented in it.

What We Can Do. What We Should Do. Here's How.

data privacy, consent & media management simplified

1. Governance – School Centric

Data Privacy

- Informed Participants
- Documented Consent
- Controlled access
- Accountability

Copyright & IP

Culture & Ethics

- Values & principles that reflect the culture of your community

2. Consent – Individual Centric

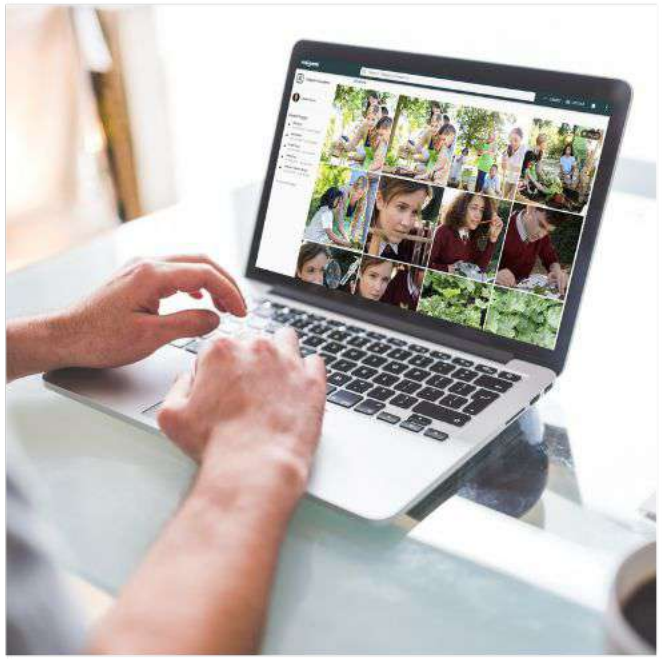
A person's right to control access to their personal information and content

- Right to revoke consent
- Right to request erasure
- Right to restrict how media is shared

3. Program – Platform Centric

Infrastructure that manages policy compliance while supporting evolving needs

- Storage growth and integration with edtech stack
- Easy to Use by everyone
- Robust administrative capabilities
- Workflow efficiency







Q&A

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Amelia Vance amelia@publicinterestprivacy.org

Reggie Johnson reggiejohnson1@me.com

vidigami

Your photos. Your stories.