St James' CE Primary School Image Use Policy

Key Details

Policy written by: Sarah Greenfield, Assistant Headteacher and Designated Safeguarding Lead

Approved by Governing Body on: 23rd September 2026

Date to be reviewed: September 2027

School Data Protection Officer: Satswana

School Designated Safeguarding Lead (DSL): Sarah Greenfield, Deputy Headteacher

Governor with lead responsibility: Nina Skomorowski-Brown

Scope and aims of the policy

1. This policy seeks to ensure that images taken within and by St James' CE Primary School are taken and held legally and the required thought is given to safeguarding all members of the community.

2. This policy applies to all staff including the governing body, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for or provide services on behalf of the school (collectively referred to as staff in this policy) as well as children and parents/carers.

3. This policy must be read in conjunction with other relevant policies including, but not limited to; child protection, online safety, anti-bullying, behaviour, data security, Acceptable Use of Technology Policies (AUPs), confidentiality, screening, searching and confiscation and relevant curriculum policies including computing, Personal Social and Health Education (PSHE), Relationships and Sex Education (RSE).

4. This policy applies to all images, including still photographs and video content taken by St James' CE Primary School.

5. All images taken by St James' CE Primary School will be used in a manner respectful of the Data Protection Principles. This means that images will be processed:
    - fairly, lawfully and in a transparent manner

- for specified, explicit and legitimate purposes
- in a way that is adequate, relevant limited to what is necessary
- to ensure it is accurate and up to date
- for no longer than is necessary
- in a manner that ensures appropriate security

6. The Data Protection Officer (DPO) within the setting (Satswana) supported by the Designated Safeguarding Lead (Sarah Greenfield) and management team are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the setting. This includes the management, implementation, monitoring and review of the Image Use Policy.

Official use of images of children

Parental consent

7. Written permission from children and/or parents or carers will always be obtained before images of children are taken, used or published.

8. Written consent will always be sought to take and use images offsite for professional, marketing and training purposes. This may be in addition to parental permission sought for onsite images.

9. Written consent from parents will be kept by the school where children's images are used for publicity purposes, such as brochures or publications, until the image is no longer in use.

10. Parental permission will be sought on admission to the school.

11. A record of all consent details will be kept securely on file. Should permission be withdrawn by parents/carers at any time, then all relevant images will be removed and disposed of, and the record will be updated accordingly.

Safety of images

12. All images taken and processed by or on behalf of the school will take place using school provided equipment and devices and in line with this and other associated policies, including but not limited to Child Protection, Staff Code of Conduct, Acceptable Use of Technology Policies.

13. Staff will receive information regarding the safe and appropriate use of images as part of their data protection and safeguarding training.

    - Staff will*:*

- only publish images of learners where they and their parent/carer have given explicit written consent to do so.
- only take images where the child is happy for them to do so.
- ensure that a senior member of staff is aware that the equipment is being used and for what purpose.
- avoid making images in a one-to-one situation.

- Staff will not
  - take images of learners for their personal use.
  - display or distribute images of learners unless they are sure that they have parental consent to do so (and, where appropriate, consent from the child).
  - take images of learners using personal equipment
  - take images of learners in a state of undress or semi-undress or which could be considered as indecent or sexual
  - take images of a child's injury, bruising or similar or make audio recordings of a child's disclosure.

14. All members of staff, including volunteers, will ensure that all images are available for scrutiny and will be able to justify any images in their possession.

15. Images will only be retained when there is a clear and agreed purpose for doing so. Sarah Greenfield designated member of staff will ensure that all images are permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use.

16. Images will be stored in an appropriately secure place, either on SharePoint or on the school media drive.

17. Images will in the school remain on site, unless prior explicit consent has been given by the DPO and DSL and the parent/carer of any child or young person captured in any images. Should permission be given to take images off site, all relevant details will to be recorded, for example who, what, when and why. Images taken offsite will be kept securely for example with appropriate protection.

18. Any memory stick/storage or device containing images of children to be taken offsite for further work will be suitably protected and will be logged in and out by the DPO and/or DSL; this will be monitored to ensure that it is returned within the expected time scale.

19. The DPO and/or DSL reserve the right to view any images taken and can withdraw or modify a member of staffs' authorisation to take or make images at any time.

20. Any apps, websites or third-party companies used to share, host or access children's images will be risk assessed prior to use.

21. The school will ensure that images always are held in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act, and suitable child protection requirements, if necessary, are in place.

22. Images will be disposed of should they no longer be required. They will be returned to the parent or carer, deleted and wiped or shredded as appropriate. Copies will not to be taken of any images without relevant authority and consent from the DPO and/or DSL and the parent/carer

Safe Practice when taking images

23. Careful consideration is given before involving very young or vulnerable children when taking photos or recordings, who may be unable to question why or how activities are taking place.

24. The school will discuss the use of images with children and young people in an age-appropriate way.

25. A child or young person's right not to be photographed or videoed is to be respected. Images will not be taken of any child or young person against their wishes.

26. Photography or video recording is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.

27. Images or videos that include children will be selected carefully for use, for example only using images of children who are suitably dressed.

Publication and sharing of images

28. Full names of children will not be used on the school website or other publication, for example newsletters, social media channels, in association with photographs or videos.

29. The school will not include any personal addresses, emails, telephone numbers, fax numbers on video, on the website, in a prospectus or in other printed publications.

30. Where images that could identify staff or children are published online, the school will ensure any image metadata is removed and lower resolution images are used.

Usage of apps/systems to share images with parents

31. The school uses Microsoft Office 365 to upload and share images of children with parents in some specific cases which are agreed with the headteacher. Specific consent from parents/carers will be obtained before photos are uploaded in this way.

32. The use of the system has been appropriately risk assessed and the governing body/headteacher has taken steps to ensure all data stored is held in accordance with GDPR and the Data Protection Act.

33. Images uploaded to Microsoft Office 365 will only be taken on school devices.

34. All users of Office 365 are advised on safety measures to protect all members of the community e.g. using strong passwords, logging out of systems after use etc.

35. Parents/carers will be informed of the expectations regarding safe and appropriate use (e.g. not sharing passwords or copying and sharing images) prior to being given access. Failure to comply with this may result in access being removed.

Use of Video Surveillance, including CCTV

36. All areas which are covered by video surveillance will be well signposted, and notifications are displayed so that individuals are advised before entering such vicinity.

37. Recordings will be retained for a limited time only and for no longer than their intended purpose; this will be a for a maximum of 30 days. All recordings are to be erased before disposal.

38. Regular auditing of any stored images will be undertaken by the Data Controller and/or DSL or other member of staff as designated by the management team.

39. If cameras record activities taking place on the premises which are of a criminal nature or give any cause for concern, then information will be referred to the appropriate agency.

40. Video surveillance cameras will be appropriately placed within the setting.

Use of webcams

41. Parental consent will be obtained before webcams will be used within the setting environment for educational purposes.

42. Where webcams are used with children to access or engage with education (for example remote learning), images and recording will be held in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act, and any necessary child protection requirements will be implemented.

43. All areas which are covered by webcams for security or safeguarding purposes (CCTV) will be well signposted, and notifications are displayed so that individuals are advised before entering such vicinity.

44. Where webcams are used for video surveillance purposes, recordings will be retained for a limited time only and for no longer than their intended purpose; this will be a for a maximum of 30 days. All recordings are to be erased before disposal.

Use of images of children by others

Use of image by parents/carers

45. Parents/carers are permitted to take photographs or video footage of events for private use only.

46. Parents/carers who are using photographic equipment must be mindful of others, including health and safety concerns, when making and taking images.

47. The opportunity for parents/carers to take photographs and/or make videos may be reserved by the school on health and safety grounds.

48. Parents/carers are only permitted to take or make recording within designated areas of the school. Photography or filming is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.

49. The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time.

50. Parents may contact the school DPO/DSL to discuss any concerns regarding the use of images.

51. Photos and videos taken by the school and shared with parents should not be shared elsewhere, for example posted onto social networking sites. To do so may breach intellectual property rights, data protection legislation and importantly may place members of the community at risk of harm.

Use of images by children

52. The school will discuss and agree age-appropriate acceptable use rules with children regarding the appropriate use of cameras, such as when engaging in remote learning and when onsite. This will include places children cannot take cameras, for example unsupervised areas, toilets etc.

53. The use of personal devices e.g. mobile phones, tablets, digital cameras, is covered within the schools mobile and smart technology policy. Children will not be permitted to use their own devices to take images or videos unless prior written consent is given from the school e.g. Year 6 residential trip. In these instances, children will agree to a specific Acceptable Use Policy

54. All staff will be made aware of the acceptable use rules regarding children's use of cameras and will ensure that children are appropriately supervised when taking images for official or curriculum use.

55. Members of staff will role model positive behaviour to the children by encouraging them to ask permission before they take any photos or videos.

56. Images taken by children for official use will only be taken with parental consent and will be processed in accordance with GDPR and the Data Protection Act.

57. Parents/carers will be made aware that children will be taking images of other children and will be informed how these images will be managed. For example, they will be for internal use by the school only and will not be shared online or via any website or social media tool.

58. Images taken by children for official use will be carefully controlled by the school and will be checked carefully before sharing online or via digital screens.

Use of images of children by the media

59. Where a press photographer is to be invited to celebrate an event, every effort will be made to ensure that the newspaper's, or other relevant media, requirements can be met.

60. A written agreement will be sought between parents and carers and the press which will request that a pre-agreed and accepted amount of personal information (such as first names only) will be published along with images and videos.

61. The identity of any press representative will be verified, and access will only be permitted where the event is planned, and where press are to be specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances.

62. Every effort will be made to ensure the press abide by any specific guidelines should they be requested. No responsibility or liability however can be claimed for situations beyond reasonable control, and where the setting is to be considered to have acted in good faith.

Use of external photographers, **including videographers and volunteers**

63. External photographers who are engaged to record any events officially will be prepared to work according to the terms of our policies, including our child protection policy.

64. External photographers will sign an agreement which ensures compliance with GDPR and the Data Protection Act.

65. Images taken by external photographers will only be used for a specific purpose, subject to parental consent.

66. External photographers will not have unsupervised access to children.

Policy breaches

67. Members of the community should report image use concerns regarding image use or policy breaches in line with existing school policies and procedures. This includes informing the headteacher and/or following the school complaints, child protection, whistleblowing and/or behaviour policies.

68. Following a policy breach, leadership staff will debrief, identify lessons learnt and implement policy changes as required. Action will be taken in line with existing school policies and procedures which may include child protection, anti-bullying, mobile and smart technology, acceptable use and behaviour policies.

69. Advice will be sought, and reports will be made to other organisations in accordance with national and local guidance and requirements. For example, where there may have been a data protection breach, the ICO will be contacted, and if an allegation has been made against a member of staff, contact will be made with the Local Authority Designated Officer (LADO).

The following are templates to be adapted for individual circumstances as needed.

Template Parental Consent for Images

Dear Parent/carer

This letter explains why we will need to ask for your consent before we are able to take images, including photographs and videos of your child during their time at St James' CE Primary School

Photographs and videos are a source of pleasure and pride. We believe that the taking and use of images can enhance the self-esteem of children and their families and therefore is something to be welcomed and appreciated.

We may take images for many reasons whilst your child is with us, including:

- documenting and recording education activities
- recording their learning and development progress
- recording and celebrating special events and achievements

We also encourage children to be active learners, and to become involved in using cameras themselves by taking photos or videos of their surroundings, activities and of each other.

We do however recognise that with the increased use of technologies, particularly digitally and online, the potential for misuse has become greater and we understand that this can give rise to concern. We will therefore endeavour to put effective safeguards in place to protect children and young people by minimising risk.

We are mindful of the fact that some families may have reasons why protecting a child's identity is a matter of anxiety. If you have special circumstances either now or at any time in the future which would affect your position regarding consent, please let us know immediately in writing.

We have a specific policy regarding the use of images and the safe use of mobile and smart technology, including mobile phones and other personal devices as part of our child protection and mobile and smart technology policy, which you are welcome to view or take a copy of at any time.

To comply with UK General Data Protection Regulations (UK GDPR) and the Data Protection Act, we need your permission before we can photograph or make any recordings of your child. If your child is old enough to express their own view, you may want to consult with them about categories of consent, and we invite you to use this letter to explore their feelings about being photographed at the setting.

Please read and complete the attached forms and do not hesitate to contact me should you have any queries.

Yours sincerely,

John Tutt (Head Teacher)

Template Parental Consent for Use of Images at St James' CE Primary School

- This form is valid for the period of time your child attends St James' CE Primary School This consent will automatically expire after this time.
- We will not re-use any photographs or recordings after your child leaves the school without requesting additional consent.
- We will not use the personal information or full names (first name and surname) of any child in a photographic image or video on our website, online, on social media, in our prospectus or in any of our other printed publications. If we use photographs or videos of individual children, we will not use the full name of that child in the accompanying text or caption. If we name a child in any text, we will not use an image of that child to accompany the article.
- We may use group photographs or footage with general labels.
- We will only take images of children who are suitably dressed.
- We will discuss the use of images with children in an age-appropriate way and role model positive online behaviour.
- This consent can be withdrawn by parents/carers at any time by informing St James' CE Primary School in writing.
- All images will be used taken and held in accordance with Data Protection legislation.
- All images will be taken and used in accordance with our Image Use, Child Protection, Acceptable Use, Social Media and Mobile and Smart Technology Policy.

Parents/carers are encouraged to discuss any concerns or queries relating to image use with us as part of making informed decisions.

May we use your child's image in displays around the school?	Yes / No
May we use your child's image for assessments, monitoring or other education uses within the school? These images and/or recordings will be used internally only.	Yes / No
May we use your child's image in our prospectus and other printed publications that we produce for education and promotional purposes?	Yes / No
May we use your child's image on our official school website?	Yes / No
May we use/record/share your child's image on webcam for appropriate curriculum purpose, for example, video conferencing and/or remote learning?	Yes / No

May we use/record/share your child's image as part of online broadcasts of performances and events? These would be pre-recorded, only shared on our official school website, embedded via the school's password protected YouTube channel, and would only be available for 30 days after the performance.	Yes / No
Are you happy for your child to appear in the media, for example, if a newspaper photographer or television film crew attend an event organised by the school?	Yes / No
Are you happy for the school to print images of your child electronically?	Yes / No

I have read and understood the conditions of image use and I am also aware of the following:

- Websites and social media sites can be viewed worldwide; not just in the United Kingdom where UK law applies.
- The press are exempt from UK GDPR and Data Protection legislation and may want to include the names and personal details of children and adults in the media.

I/we will discuss the use of images with our *child/re*n to obtain their views, if appropriate.

As the child's *parents/guardians*, *we/*I agree that if *we/I* take photographs or video recordings of our *child/ren* which include other children, then we will only use these for our own personal use.

Name of Child: _____ Date: _____

Parent/Carer Name: _____

Parent/carer's signature: _____

Child's Signature (if appropriate): _____

Template Group Activity Letter and Form

Dear Parent/Carer

We are staging a production/special event of name on date. We are sure some parents/carers would like to take photographs/videos of the production. As you know we have a policy in place with regards to the taking, making and use of images and you will have previously signed a consent form stating whether your child could be photographed or filmed.

If you wish to take photos or videos at the production, there is a strong possibility that other children will also be included. We therefore need to ensure all parents/carers who have children in the production are happy for photographs and/or videos to be taken.

We all enjoy and treasure images of our family and friends; family events, holidays and events are moments we all like to capture in photos or on video. We now have the exciting dimension of adding our images and videos to our online social networks. This means that we can easily share our photos and video with family and friends.

Whilst this can be very useful to all of us, we must ensure that we protect and safeguard all children and staff, including those who do not want to have their images stored online. Some children are at risk and **MUST NOT** have their image put online. Not all members of the community will know who they are:

- Once posted and shared online, an image or video can be copied and could stay online forever.
- Some people do not want their images shared online for personal or religious reasons.
- Some children and staff may have a complex family background, which means that sharing their image online could pose significant safeguarding risks and consequences.

In order to keep all members of the community safe we must all **think before we post** online.

At St James' CE Primary School we are happy for parents and carers to take photos and video of events for personal use, but we request that these images are not distributed or shared online; this is to protect all members of the community.

Please be aware that parents are not permitted to take photographs or to make a video recording for anything other than their own personal use for example, with a view to selling videos of an event.

Should any parent/carer not agree with their child being photographed, we will consider alternative options including:

- restricting who is involved in the production/special event
- staging specific photograph opportunities

Photographs of productions are ones which parent/carers tend to treasure; we will therefore only prohibit the use of cameras as a last resort. We hope you will support us in this.

We would, therefore, be very grateful if you would complete the slip at the bottom of this letter and return it by (date).

Yours sincerely

(Name)

Headteacher/Manager

Parental consent for images as part of group activity

I understand that whilst the school has requested that parents only take and share images of their own children, it is possible that my child may appear in parents' photographs or videos.

I am / am not * happy for photographs/videos to be taken of the production/special event in which my child is due to appear on (date).

(*Please delete as appropriate)

Child's name: _____

Date: _____

Parent/Carer's Name: _____

Parent/carer's signature: _____

Child's Signature (if appropriate): _____

Template Broadcasting Letter and Form

Dear Parent/Carer

We are staging a production/special event on date. This year, we will be sharing event name online. **List details of how this will be achieved, for example, it will be pre-recorded and shared online or live streamed, what platform will be used and any specific times.**

The recording will be available for (**insert details about the timeframes for the availability of recordings after the event or remove if it will be live streamed only).**

As you know we have a policy in place with regards to the taking, making and use of images and you have previously signed a consent form stating whether your child could be photographed or filmed.

We all enjoy and treasure images of our children. Whilst the use of technology to share and access images brings fantastic benefits, we must however ensure that we protect and safeguard all children and staff. Some children are at risk and **MUST NOT** have their image shared online and not all members of our community will know who they are.

In order to keep all members of the community safe we must all think before we share online. You can support us in keeping all children safe by: **(amend as appropriate)**

- Remembering images and videos shared with you by the school are for your own or your family's personal use only.
- Thinking about who has the right to view or listen to the recordings, not only of your own child, but of others who will have been included as well.
- Considering whether or not to share this imagery online. If you choose to do so then you must make sure this is limited to immediate family only and not made publicly available.
- **Include any setting expectations around taking screenshots, private recordings and wider sharing of the broadcast**

If content is shared or accessed outside of our requested expectations, then we may restrict or prohibit access in the future. Photographs of special events are ones which parent/carers tend to treasure; we will therefore only prohibit access as a last resort. We hope you will support us in this.

We would, be very grateful if you would complete the slip at the bottom of this letter and return it by (date). If you need to discuss any of the points within this letter or have a related image use query, please don't hesitate to contact us to discuss further.

Yours sincerely

(Name)

Headteacher/Manager

Parental consent for children's images being broadcast online

I understand that school/setting will be broadcasting event name online.

The event will be broadcast/recording will be available via insert details e.g. platform, how it can be accessed and specific times if it will be live streamed.

I understand the broadcast will be accessible for insert details about the timeframes for the availability and access to recordings after the event. **Remove if live streaming only**.

I understand that the school/setting has requested that parents/carers:

- Do not share the link or related access information to broadcast events with anyone outside of the immediate family.
- **Include any expectations regarding taking screenshots, private recordings and wider sharing of the broadcast.**

I *am / am not* * happy for my child to be involved in the broadcast of production/special event on (date).

(*Please delete as appropriate)

Child's name: _____

Date: _____

Parent/Carer's Name: _____

Parent/carer's signature: _____

Child's Signature (if appropriate): _____

Guide to the Use of Images

St James' CE Primary School Online

Using Images Safely and Responsibly

We all enjoy and treasure images of our family and friends; family events, holidays and events are moments we all like to capture in photos or on video. We now have the exciting dimension of sharing our images and videos to online social networks, such as Facebook, YouTube, WhatsApp and other websites. This means that we can easily share photos and video with family and friends quickly. Whilst this can be useful, we must however ensure that we all take steps to protect and safeguard children and staff, including those who do not want to have their images stored or shared online.

What should we all think about before posting any images or video online and are there any risks?

- Once posted and shared online any image or video can be copied and will stay online forever.
- Some people do not want their images online for personal or religious reasons.
- Some children and staff may have a complex family background which means that sharing their image online can have unforeseen and dangerous consequences.
- Some children are at risk and MUST NOT have their image put online; not all members of the community will know who they are.

In order to keep all members of the community safe we must all '**think before we post'** online

At St James' CE Primary School we are happy for parents and carers to take photos and video of events for personal use but request that these images are not posted or shared online. This is to protect all members of the community.

We thank you for your support.

Further Information on the use of Images and video and online safety:

- Information Commissioner's Office: https://ico.org.uk
- NCA-CEOP: www.thinkuknow.co.uk/parents
- Get Safe Online: www.getsafeonline.org
- Childnet: www.childnet.com

Adapted from resources developed by the Hertfordshire Schools' e-Safety Team

Respect and Care for the Whole Community when taking Photos and Videos

We are happy for parents and carers to take photos and video of their child at this event for personal use. We request that these images are not distributed or shared online if they contain other children, adults or staff without consent. Sharing images of others online may put our community at risk.

Thank you for your support

John Tutt

Adapted from resources developed by the Hertfordshire Schools' e-Safety Team