



Image Use Policy

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Higham Primary School follows the KCC document 'Image Use Policy for Educational Settings' for Kent schools

[https://www.kelsi.org.uk/child-protection-and-safeguarding/safeguarding-policies-and-guidance-Additional online safety templates and guidance – image use template and guidance](https://www.kelsi.org.uk/child-protection-and-safeguarding/safeguarding-policies-and-guidance-Additional%20online%20safety%20templates%20and%20guidance%20-%20image%20use%20template%20and%20guidance)

School Data Protection Officer (DPO): Satswana Ltd

School/Setting Data Controller: School Business Manager

School/Setting Designated Safeguarding Lead (DSL): Headteacher

Governor with lead responsibility: Site Manager



Image Use Policy

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Image Use Policy

1. Statement of intent

At Higham Primary School, we use images and videos for a variety of purposes, including prospectuses, display boards, educational purposes, conferences, the school website and school social media. We understand that parents may also wish to take videos or photos of their children participating in school events for personal use.

Whilst we recognise the benefits of photography and videos to our school community, we also understand that these can have significant risks for those involved. Under the legal obligations of the UK GDPR and the Data Protection Act (DPA) 2018, the school has specific responsibilities in terms of how photos and videos are taken, stored and retained.

The school has implemented a policy on the safe cameras and recording equipment by staff, pupils and parents to reflect the protective ethos of the school with regard to pupils' safety.

In order to ensure that, as far as possible, the use of photography and video is safe at all times, the policy provided below should be followed. This policy is applicable to all forms of visual media, including film, print, video, DVD and websites

2. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- The Freedom of Information Act 2000
- Equality Act 2010
- Human Rights Act 1998
- Voyeurism (Offences) Act 2019
- DfE 'Keeping children safe in education 2025'

This policy operates in conjunction with the following school policies including but not limited to:

- GDPR Data Protection Policy
- Anti-bullying Policy
- Mobile and Smart Technology and Social Media Policy
- Acceptable Use of Technology Policy
- Staff Code of Conduct
- Child Protection Policy
- Behaviour Policy
- CCTV Policy
- Computing Policy
- Personal, Social and Health Education (PSHE) Policy including Relationships, Sex and Health Education (RE)



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3. Roles and Responsibilities

The Headteacher is responsible for:

- Submitting consent forms to parents, and pupils where appropriate, at the beginning of the academic year with regard to photos and videos being taken whilst at school.
- Ensuring that all photos and videos are stored and disposed of correctly, in line with the UK GDPR and the DPA 2018.
- Deciding whether parents are permitted to take photos and videos during school events.
- Communicating this policy to all the relevant staff members and the wider school community, such as parents.

All DSL's are responsible for:

- Liaising with social workers to gain consent for the use of photos and videos of LAC.
- Liaising with the DPO to ensure there are no data protection breaches.
- Informing the Headteacher of any known changes to a pupil's security, e.g. child protection concerns, which would mean that participating in photography and video recordings would put them at significant risk.

Parents and pupils are responsible for:

- Completing the photography consent (parental consents) on Bromcom My Child at School
- Informing the school in writing if they wish to make any changes to their consent.
- Acting in accordance with this policy.

4. Scope and aims of the policy

- This policy seeks to ensure that images taken within and by Higham Primary School are taken and held legally and the required thought is given to safeguarding all members of the community.
- 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.
- This policy must be read in conjunction with other relevant school policies including, but not limited to those stated within the Legal Framework.
- This policy applies to all images, including still photographs and video content taken by Higham Primary School.
- All images taken by Higham 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



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- 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
- The DSL, Data Controller and management team overseen by the Governing Board 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.

5. Official use of images of children

5.1. Parental Consent

- Written and/or online permission from parents or carers will always be obtained before images and/or videos of children are taken, used or published.
- Written and/or online parental 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.
- Written and/or online consents from parents will be kept by Higham Primary School where children's images are used for publicity purposes, such as brochures or publications, until the image is no longer in use.
- Parental permission will be sought on admission to Higham Primary School.
- A record of all consent details will be available to view online via Bromcom – My Child at School and any written paper versions 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.

5.2. Safety of images and videos

- All images taken and processed by or on behalf of Higham Primary School will take place using Higham Primary School provided equipment and devices and in line with this and other associated policies, including but not limited to Child Protection and Staff Code of Conduct.
- Staff will receive information regarding the safe and appropriate use of images as part of their data protection and/or safeguarding training.

Staff will:

- Only publish images of learners where they and their parent/carer have given explicit written consent to do so.



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- 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. The only permitted personal equipment is the Site Manager camera whereby a school owned memory stick will be used to store any images taken. Images will only be kept for a limited time and will be deleted from the memory stick once the images are no longer required for the intended purpose.
 - Take images of learners in a state of undress or semi-undress or which could be considered indecent or sexual.
 - Take images of a child's injury, bruising or similar, or make audio recordings of a child's disclosure.
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- 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.
 - Images will only be retained when there is a clear and agreed purpose for doing so. The DSL 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.
 - Images will be stored in an appropriately secure place:
 - Within a locked cupboard in the Site Manager's locked office.
 - Images in Higham Primary School will remain on site, unless prior explicit consent has been given by both the DSL and the parent or carer of any child or young person captured in any images. Should permission be given to take images off site, all relevant details will be recorded, for example who, what, when and why. Images taken offsite will be kept securely, for example with appropriate protection.
 - 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 School Business Manager and/or DSL; this will be monitored to ensure that it is returned within the expected timescale.
 - All digital images will be stored and shared internally via a secure password protected site with Multi Factor Authentication (MFA).
 - The DPO and/or DSL reserves the right to view any images taken and can withdraw or modify a member of staffs' authorization to take or make images at any time.
 - Any apps, websites or third-party companies used to share, host or access children's images will be risk assessed prior to use.



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- Higham Primary School will ensure that images are always held in accordance with the UK General Data Protection Regulations (UK GDPR) and Data Protection Act, and suitable child protection requirements, if necessary, are in place.
- 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 be taken of any images without relevant authority and consent from the DPO and/or DSL and the parent/carer.

5.3. Safe practice when taking images and videos

- 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.
- Higham Primary School will discuss the use of images with children and young people in an age-appropriate way.
- A child or young person's right not to be photographed is to be respected. Images will not be taken of any child or young person against their wishes.
- Photography or video recording is not permitted in sensitive areas such as changing rooms, toilets, and swimming areas etc.
- Images or videos that include children will be selected carefully for use, for example only using images of children who are suitably dressed.

5.4. Publication and sharing of images and videos

- Children's full names will not be used on the Higham Primary School website or other publications, for example newsletters, social media channels, in association with photographs or videos.
- Higham Primary 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.
- Where images that could identify staff or children are published online, Higham Primary School will ensure any image metadata is removed and lower resolution images are used.

5.5. Usage of apps / systems to share images with parents

- Higham Primary School uses Tapestry and Class Dojo to upload and share images of children with parents.
- 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.



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- Images uploaded to Tapestry and Class Dojo will only be taken on Higham Primary School owned devices.
- All users of Tapestry and Class Dojo are advised on safety measures to protect all members of the community e.g., using strong passwords, logging out of systems after use etc.
- 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.

6. Use of Video Surveillance including Closed-Circuit Television (CCTV)

- All areas which are covered by video surveillance (CCTV) will be well signposted, and notifications are displayed so that individuals are advised before entering such a vicinity.
- Recordings will be retained for a limited time only and for no longer than their intended purpose; this will be for a maximum of 30 days. All recordings are to be erased before disposal.
- Regular auditing of any stored images will be undertaken by the Lead Governor and/or Data Controller and/or DSL or other members of staff as designated by the management team.
- 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.
- Video surveillance cameras will be appropriately placed within the setting.
- Please see CCTV Policy for further details

7. Use of webcams

- Parental consent will be obtained before webcams are used within the setting environment for educational purposes.
- 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 UK General Data Protection Regulations (UK GDPR) and Data Protection Act, and any necessary child protection requirements will be implemented.
- All areas which are covered by webcams for security or safeguarding purposes will be well signposted, and notifications are displayed so that individuals are advised before entering such a vicinity.

8. Use of images of children by others

8.1. Use of images by parents / carers

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



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- Parents/carers who are using photographic equipment must be mindful of others, including health and safety concerns, when making and taking images.
- The opportunity for parents/carers to take photographs and make videos can be reserved by Higham Primary School on health and safety grounds.
- Parents/carers are only permitted to take or make a recording within designated areas of Higham Primary School. Photography is not permitted in sensitive areas such as changing rooms, toilets, and swimming areas etc.
- The right to withdraw consent will be maintained, and any photography or filming on site will be open to scrutiny at any time.
- Parents may contact the Higham Primary School DPO/DSL to discuss any concerns regarding the use of images.
- Photos and videos taken by Higham Primary 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.

8.2. Use of images by children

- Higham Primary 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.
- The use of personal devices, for example, mobile phones, tablets, digital cameras, is covered within Higham Primary School Mobile and Smart Technology and Social Media Policy.
- 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.
- Members of staff will role model positive behaviour to the children by encouraging them to ask permission before they take any photos or videos.
- Images taken by children for official use will only be taken with parental consent and will be processed in accordance with UK GDPR and the Data Protection Act.
- 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 Higham Primary School only and will not be shared online or via any website or social media tool.
- Images taken by children for official use will be carefully controlled by Higham Primary School and will be checked carefully before sharing online or via digital screens.

8.3. Use of images of children by the media



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- Where a press photographer is to be invited to celebrate an event, every effort will be made to ensure that the newspaper, or other relevant media, requirements can be met.
- 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.
- The identity of any press representative will be verified and access will only be permitted where the event is planned, and where the press are to be specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances.
- 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.

8.4. Use of external photographers including videographers and volunteers

- External photographers who are engaged to record any events officially will be prepared to work according to the terms of Higham Primary Schools policies including our Child Protection Policy and Mobile, Smart Technology and Social Media Policy.
- External Photographers will sign an agreement which ensures compliance with UK GDPR and the Data Protection Act.
- Images taken by external photographers will only be used for a specific purpose, subject to parental consent.
- External Photographers will not have unsupervised access to children.

9. Policy breaches

- Members of the community should report image use concerns regarding images use or policy breaches in line with existing Higham Primary School policies and procedures. This includes following the Whistleblowing Policy or Complaints Policy and Procedure.
- 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 Higham Primary School policies and procedures which may include Child Protection, Anti-Bullying, Mobile and Smart Technology and Social Media, Acceptable Use of Technology and Behaviour policies.
- 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).