

Lydden and River Primary Schools Federation

Image Use Policy

Date written: September 2024

Date of last update/review: August 2026

Date agreed and ratified by Governing Body: To be confirmed

Date of next full review: September 2027

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

Key Contacts

	River	Lydden
Designated Safeguarding Lead (DSL)	Mrs V Alliston – headteacher@river.kent.sch.uk	Mrs C Lintott headteacher@lydden.kent.sch.uk
Deputy Designated Safeguarding Lead(s)	Ms T Moody- tmoody@river.kent.sch.uk Mrs J Brown – jbrown@river.kent.sch.uk Miss L Chase Lchase@river.kent.sch.uk Mrs S Clarke Sclarke@river.kent.sch.uk	Mrs K Gibbs kgibbs@lydden.kent.sch.uk
Headteacher	Mrs V Alliston	Mrs C Lintott
Safeguarding Governor	Mrs E Hunt (Safeguarding lead for Governing Body) - EHunt@river.kent.sch.uk	
Other key staff	Mrs J Hulks(Chair of Governors) - jhulks@river.kent.sch.uk	

Official use of Images/Videos of Children

Scope and aims of the policy

- This policy seeks to ensure that images and videos taken within and by *both Lydden and River Primary schools* 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; safeguarding and child protection, anti-bullying, behaviour for learning, data security, image use, Acceptable Use Policies, confidentiality and relevant curriculum policies including computing, Personal Social and Health Education (PSHE), Citizenship and Relationships and Sex Education (RSE).
- This policy applies to all images, including still and video content taken by or at *Lydden and River Primary schools*
- All images taken 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
- The Data Protection Officer (DPO) within the school, supported by the DSL and leadership 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.

Parental consent

The school will identify and document an appropriate lawful basis under UK data protection law before taking, storing, using or sharing identifiable images or videos. Where consent is the lawful basis, it will be obtained from a parent/carer in accordance with the school's consent arrangements, normally on admission. Consent will not be treated as the lawful basis for every use of images where another lawful basis is more appropriate.

- Where the school relies on consent for photography or filming for publicity, marketing, training or other non-essential purposes, specific consent will be obtained before the image is used. For educational activities and other school functions, the school will identify the appropriate lawful basis and will check any safeguarding restrictions before images are used or shared.
- Records of consent, where consent is the lawful basis, will be retained securely for as long as necessary to demonstrate the consent and manage the relevant processing. Where consent is withdrawn, the school will stop future processing that relies on that consent and will take reasonable steps to remove or delete images where appropriate.
- 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 and videos

- All images taken and processed by or on behalf of each school will take place using only school provided equipment and devices. When not in use such technology must be kept securely.
- Staff will receive information regarding the safe and appropriate use of images as part of their data protection and safeguarding training.
- 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 not be kept for longer than is to be considered necessary. A designated member of staff (DPO or DSL) will ensure that all photographs 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 stored on memory cards must be deleted once the image has been used for its intended purpose.
- All images will remain on site, unless prior explicit consent has been given by both DPO and DSL and the parent or carer of any child or young person captured in any photograph.
 - Should permission be given to take any images off site then all relevant details will to be recorded, for example who, what, when and why and data will be kept securely for example with appropriate protection.
- Any memory stick, CD or storage device containing images of children to be taken offsite for further work will be suitably protected/encrypted 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.
- Any cameras or recording devices taken on educational visits must be considered highly sensitive and be looked after with great care by the staff member authorised to capture images.
- 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.
- Only official setting owned equipment and cameras will be used by staff to capture images of children for official purposes. Use of personal equipment and cameras by staff is prohibited.
- Any apps, websites or third-party companies used to share, host or access children's images now or in the future will be risk assessed and approved prior to use.
- The school will ensure that images always are held in accordance with the UK General Data Protection Regulation (UK GDPR) (GDPR) and Data Protection Act, and suitable child protection requirements, if necessary, are in place.
- Images will be deleted, securely destroyed or otherwise disposed of when they are no longer required for the purpose for which they were collected, unless there is a lawful reason to retain them. Copies must not be made or retained outside approved school systems without authorisation. When a child leaves the school, the school will review images containing their likeness and will not routinely publish new images of them after they have left the school roll, unless there is an appropriate lawful basis and no safeguarding restriction.

KCSIE 2026: safeguarding and image use

This policy has been updated for Keeping Children Safe in Education (KCSIE) 2026, which comes into force on 1 September 2026. It must be read alongside the school's Child Protection/Safeguarding Policy and Online Safety Policy. KCSIE 2026 reinforces that safeguarding applies to online as well as offline activity and that images and videos can form part of safeguarding concerns, including child-on-child abuse.

The term 'images' in this policy includes photographs, videos, livestreams and other visual content. The school recognises that images may be digitally altered or generated using artificial intelligence (AI), including deepfakes or other manipulated imagery. The same safeguarding principles apply whether an image is photographic, digitally altered or wholly AI-generated.

If a member of staff becomes aware of an image or video involving a child that may be abusive, exploitative, intimate or otherwise create a safeguarding concern, they must report the concern immediately to the DSL or deputy DSL in accordance with the Child Protection/Safeguarding Policy. Staff must not forward, copy, download, save or share suspected illegal images. Staff should not deliberately view illegal child sexual abuse material. Where viewing an image is unavoidable as part of managing a safeguarding report, staff must follow the DSL's direction and the school's safeguarding procedures.

The school will respond to concerns involving the creation, possession or sharing of self-generated intimate images or videos, including AI-generated or manipulated intimate images, as safeguarding concerns. This includes situations where images are shared consensually, non-consensually or without the knowledge of the child. Staff must not dismiss such incidents as 'banter' or treat them solely as behaviour matters.

Where an image-related concern has an online element, the school will consider the need to preserve evidence safely, report to the appropriate safeguarding or law-enforcement agency, and provide support to affected children in line with the Child Protection/Safeguarding Policy and relevant national guidance.

Staff must remain alert to the possibility that publicly available school images could be copied, manipulated or used to identify or target children. Before publication, staff must check the school's current image permissions/restrictions and, where there is any safeguarding concern, consult the DSL before an image is used.

Publication and sharing of images and videos

- Images or videos that include children will be selected carefully for use, for example only using images of children who are suitably dressed.
- Images and videos will be selected and published in a way that minimises unnecessary disclosure and the risk of copying, manipulation, misuse or re-identification. The school recognises that once an image is published online it may be copied, altered or redistributed and that technical measures cannot eliminate this risk.
- Children's full names will not normally be published alongside photographs or videos on the school website, newsletters, social media or other public-facing material. Any exception must be justified, authorised and consistent with safeguarding and data protection requirements.
- The school will not include any personal addresses, emails, telephone numbers on video, on the website, in a prospectus or in other printed publications.

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.
- The 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 is not permitted in sensitive areas such as changing/cloak room, toilets, at swimming pool etc

Use of Closed-Circuit Television (CCTV) at River Primary School

- All areas which are covered by CCTV will be well signposted, and notifications are displayed so that individuals are advised before entering such vicinity – these areas are external to the building.
- 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.
- 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.
- 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.
- CCTV cameras are not placed inside the building.

Use of webcams

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

- 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 vicinity.
- 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 photos and videos of children by others

Use of photos and videos by parents/carers

- Parents/carers may take photographs or video footage at school events only where the school has expressly permitted this and for their own private, personal use. The school may restrict or prohibit recording where necessary for safeguarding, privacy, health and safety or other legitimate reasons.
- 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 the school on health and safety grounds.

- Parents/carers are only permitted to take or make recording within designated areas of the school. Photography is not permitted in sensitive areas such as changing/ cloak room, toilets, at swimming pool etc.
- Where consent is the lawful basis, the right to withdraw consent will be respected. All photography and filming carried out on school premises must be capable of being explained and justified and may be subject to scrutiny by the DSL, DPO or senior leaders.
- Parents may contact the school DPO/DSL to discuss any concerns regarding the use of images.
- Photos and videos shared by the school with parents/carers are for the stated purpose only and must not be copied, redistributed or posted online, including on social media, unless the school has expressly authorised this. Unauthorised sharing may breach data protection, copyright or safeguarding requirements and may place children or adults at risk of harm.

Use of photos/videos by children

- The Lydden and River Primary Schools Federation will discuss and agree age-appropriate acceptable use rules with children regarding the appropriate use of cameras, such as places children cannot take the camera, for example unsupervised areas, toilets etc.
- The use of personal devices e.g. mobile phones, tablets, children's own digital cameras, is covered within the school online safety policy within the Child Protection 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.
- Photos taken by children for official school use must be supervised by staff and must only be used where the school has identified an appropriate lawful basis and checked all relevant safeguarding restrictions. They must be processed in accordance with UK data protection law and this policy.
- Parents/carers will be made aware that children will be taking photos/videos of other children and will be informed how these images will be managed. For example, they will be for internal use by the setting only and will not be shared online or via any website or social media tool.
- Photos 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.
- Still and video cameras provided for use by children and the images themselves will not be removed from the setting.

Use of images of children by the media

- 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.
- 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 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.

Use of external photographers (*this includes volunteers such as staff or parents*)

- External photographers who are engaged to record any events will be prepared to work according to the terms of the settings online safety policy.
- 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.
- Photographers will not have unsupervised access to children and young people

Signed: _____ Date: September 2026
Chair of Governors

Date to be reviewed: September 2027, or sooner following any relevant national/local policy, legislation or safeguarding changes.

Children's Images: Frequently Asked Questions for Parents/Carers

Why do we need a policy?

Schools, playgroups, nurseries and youth groups have always used photographs as a way of celebrating achievement or seeking publicity for fundraising etc. Families and children often enjoy seeing their loved ones in print or on a website. We want to ensure that everyone can continue to enjoy these activities safely. However, parents/carers need to be aware that placing any identifying information in the public domain has risks and will need to understand these issues to give properly considered consent. It is important that parents/carers and educational settings can fully consider the issues before any problems can arise.

So, what are the risks?

The most highly publicised and worrying risk is that a child who appears in the paper or on a web site may become of interest to a predatory sex offender. Locating people through the internet has become extremely easy, using widely available software, so if there is a picture and the name of a school/setting together with the name of the child then it could be quite easy to find out the child's address and even work out their likely route to school/setting. There are also other specific groups of children and families whose safety could be put at risk if identified e.g. families fleeing domestic abuse. To limit these potential risks, we will take appropriate steps, as outlined in the attached consent form, to safeguard children and the wider community.

Isn't this just scaremongering?

Sadly not. We have had cases in Kent of families receiving unwelcome phone calls following appearances in the press. However, this is rare, so it is important to have a sense of proportion in these matters. Remember we want to celebrate success and achievement, but parents must be aware of risks to make an informed decision.

What about school/setting websites?

The same concerns apply to school/setting controlled online sites; there is an added concern that images of children can be copied, manipulated or changed by another person. We can try to copy protect images and will use lower quality images, but this can be bypassed so cannot not be relied upon to keep images safe.

I want to do my own recording of the school/setting play/event is this okay?

Taking pictures or recordings of your own children for your own personal use is okay. The difficulty arises when other children are also be filmed. It is important that we are all aware that some members of the community may be vulnerable and must not have their image shared online as they could be put at risk from harm. You may not always know who these people and we need everyone's support to protect the whole community. It is also important for us all to role model positive behaviour for children, so it might be a sensible idea to check first before posting any images online which contain other children than your own. Parents/carers should not copy images from the school website without appropriate permission from the school

Lydden and River Primary Schools Federation

Dear Parent/Carer

We are staging a **production/special event** of on **xxxxxx**. We are sure some parents/carers would like to take photographs/videos of the occasion. 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 or not your child could be photographed. In circumstances, such as productions or special events, we request specific consent before photographs can be taken by a third party. If you wish to take photos at the production there is a strong possibility that other children will also be included within the picture. We therefore need to ensure all parents/carers who have children in the production are happy for photographs to be taken, and hence need to request their permission.

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 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 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 consequences.
- Therefore, in order to keep all members of the community safe we must all **'Think Before We Post'** Online

At **school name** we are happy for parents and carers to take photos and video of events for personal use, but we specify that these images must not distributed or put 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 (e.g. with a view to selling videos of an event).

Should any parent/carers 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 setting productions are ones which parent/carers tend to treasure. We will therefore only prohibit the use of cameras and videos 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 to the school office by **date**.

Yours sincerely

Class Teacher/ Head Teacher

Lydden and River Primary Schools Federation
Parental Consent for Images as part of Group Activity

Child's name: _____ Date: _____

I am / am not * happy for photographs to be taken of the **production/special event** in which my child is due to appear on **xxxxxx** (date) (*Please delete as appropriate)

Parent/Carer Name: _____ Parent/carer's signature: _____

Lydden and River Primary Schools Federation

Guide to the Use of Images 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 adding our images and videos to our online social networks, such as Facebook, YouTube and many other websites. 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 we protect and safeguard all children and staff, including those who do not want to have their images stored 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 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.

Therefore, in order to keep all members of the community safe we must all **'Think Before We Post'** Online

At Lydden and River Primary Schools, we are happy for parents and carers to take photos and video of events for personal use, unless we state otherwise, but these images are not to be distributed or put 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:

- Information Commissioner's Office: <https://ico.org.uk/for-organisations/education/>
- Think U Know: www.thinkuknow.co.uk/parents
- Get Safe Online: www.getsafeonline.org

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 for personal use, but we state that these images are not to be distributed or shared online if they contain images of other children, adults or staff without consent. Sharing images of others online may put our community at risk.

Thank you for your support

Headteacher

Consent form for using photographs of Staff

The school might occasionally like to use your photograph, although these are not routinely used for staff recognition purposes. These images might appear as part of a PowerPoint, where you appear either alone or as part of a group, including with children and they may appear on the school website. To comply with UK General Data Protection Regulation (UK GDPR) (GDPR) and the Data Protection Act, we need your permission to use photographs of you. Please answer the question below, then sign and date the form where shown. We will not use the images taken, or any other information you provide, for any other purpose. You have the right at any time to request that your photograph is not taken, to ask the purpose or to change your consent given below.

Please return the completed form, even if you have chosen not to give your consent, to the federation Business manager.

Please circle
your answer

May we use your image on our;

- | | |
|---|-----------------|
| • School/Federation Website | Yes / No |
| • School Facebook | Yes / No |
| • Display/notice boards, accessible within school | Yes / No |
| • Slide presentations/film – eg for parents or CPD purposes | Yes/No |

Please confirm that you have read and understand the conditions for use, and the notes relating to the principles of the Data Protection Act.

- I have read and understood the conditions of use.
- I confirm that I understand publication of my picture will mean that my picture will be viewable by those with access, alongside my job title and work contact details and I consent to such processing of my personal data.
- I understand that if my picture and details are placed on the website and/or social media channels potentially this will be accessible by anyone in the world with internet access.
- I understand that I must check that permission has been given by a staff member, child or child's parent before taking, using or publishing an image.

Name: _____ Signed: _____

Date: _____

Conditions of use

1. This form is valid for the period of your employment. Your consent will automatically not apply to any other usage photos. Your consent will be sought again if the school changes the way it intends to use or publish images.
2. Images must only be used in circumstances where consent has been given. Signed consent must be given for images to appear on the website (which is viewable by potentially anyone), or they cannot be published in this way.
3. Under the UK GDPR and the Data Protection Act your rights include:
 - a) Your consent (to the publication of your photo) can be withdrawn at any time (principle 1 of the Act)
 - b) Your photo will not be used for any other purpose without your further consent (principle 2 of the Act)
 - c) Your personal data will be accurately maintained and kept up to date (principle 4 of the Act)
 - d) Publication of your photo will cease and all electronic copies will be deleted when you leave the setting (principle 5 of the Act)

The school's Child Protection/Safeguarding Policy, Online Safety Policy, Data Protection/Privacy documentation and Staff Code of Conduct.

Working Together to Safeguard Children 2026 (Department for Education).

Data protection in schools: Taking and using photos and videos, and using CCTV in schools (Department for Education, updated July 2026).

Keeping Children Safe in Education 2026 (Department for Education), in force from 1 September 2026.

Key statutory and guidance references

Useful Contacts

Kent County Council's Online Safety Guidance and Information for Education Settings:

www.kelsi.org.uk/child-protection-and-safeguarding/e-safety

Kent County Council's Access to Information Content

www.kelsi.org.uk/school-management/data-and-reporting/access-to-information

Kent County Council Education Safeguards Team Content:

www.kelsi.org.uk/child-protection-and-safeguarding

ATL Help and Advice on CCTV and other surveillance:

www.atl.org.uk/help-and-advice/school-and-college/CCTV.asp

ICO: CCTV and video surveillance guidance.

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

ICO Sector Guide for Education:

www.ico.gov.uk/for_organisations/sector_guides/education.aspx

Information Commissioner's Office (ICO): data protection guidance for education and organisations.

ICO data protection guidance

United Kingdom's Copyright Licensing Agency: <http://www.cla.co.uk/>

International Federation of Reproduction Rights Organisation: <http://www.ifrro.org/>

Acknowledgements

This document is the work of the Kent Online Safety Strategy Group and has been based on the "Policy and Guidance for Kent Schools, Settings and KCC Services on the use of photographic images of children" (2008, 2012, 2016, 2017) and the Online Safety Policy Template 2018.

This edition has been the work of:

Rebecca Avery, KCC; Michelle Hunt, KCC;

Additional material has been used and developed with thanks to the following organisations:

Hampshire County Council
Herefordshire Grid for Learning (Schools e-Safety Team)
Information Commissioners Office
South West Grid for Learning
Plymouth County Council (Early Years Toolkit)

