Tenterden Primary Federation

Image Use Policy

Key Details

Policy written by: Rachel Peachey, Deputy Headteacher

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Tenterden Primary Federation Data Protection Officer: WorkNest

Tenterden Primary Federation Designated Safeguarding Lead (DSL): Tina McIntosh, Executive Headteacher

Governor with lead responsibility: *Anne-Marie Martin*

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Scope and aims of the policy

1. This policy seeks to ensure that images and recordings taken, stored, used or shared by Tenterden Primary Federation are managed lawfully, safely and appropriately, with due regard to safeguarding, online safety, privacy and data protection.

2. This policy applies to all members of the Tenterden Primary Federation community, including child(ren), parents/carers, staff, governors, trustees, volunteers, students, visitors, contractors, external providers and any other individuals who take, use, store, access or share images on behalf of, or within, the Tenterden Primary Federation.

3. This policy must be read alongside other relevant policies, including but not limited to child protection, behaviour, anti-bullying, online safety, data protection, privacy notices, staff code of conduct/safer working practice, acceptable use, mobile and smart technology, social media, confidentiality, whistleblowing, low-level concerns/allegations, CCTV/video surveillance and relevant curriculum policies.

4. This policy applies to all images and recordings, including still photographs, video recordings, livestreams, webcam images, CCTV/video surveillance footage and any other digital image or recording taken, stored, used or shared by, or on behalf of, Tenterden Primary Federation.

5. Images of identifiable individuals are personal data. Tenterden Primary Federation will ensure that images are processed in line with data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Images will be processed:
    - fairly, lawfully and in a transparent manner
    - for specified, explicit and legitimate purposes
    - in a way that is adequate, relevant and 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 leadership team, supported by the Data Protection Officer, WebNest, Designated Safeguarding Lead (DSL), Tina McIntosh and the LGB, is responsible for ensuring the safe, lawful and appropriate use, storage, sharing and disposal of images. This includes implementation, monitoring, staff training and regular review of this policy.

Official use of images of children

Consent, lawful basis and transparency

7. Consent will not be treated as a one-off administrative process. Tenterden Primary Federation will review consent arrangements regularly and at key transition points to ensure parents/carers and, where appropriate, child(ren), understand how images may be used.

8. Child(ren)'s wishes and feelings will be sought and taken into account in an age-appropriate way. Images will not normally be taken or used where a child indicates that they do not wish to be photographed or recorded, unless there is a clear and justified reason to do so.

9. Where images are used for publicity, publication, websites, social media, media activity, marketing or wider external communication, written consent will usually be obtained from parents/carers, unless another appropriate lawful basis has been identified and documented. Child(ren)'s wishes and feelings will be sought and taken into account where appropriate.

10. Where images are used for necessary internal educational, safeguarding, security or administrative purposes, Tenterden Primary Federation will identify an appropriate lawful basis and ensure images are used only where necessary, proportionate and secure. Consent may not be the most appropriate lawful basis for these necessary internal uses.

11. Specific consent will be sought where images are used for training, publicity, marketing, media activity, online broadcasts or any purpose not covered by the original consent.

12. Consent records will be retained securely for as long as the relevant image is in use and in line with the school data retention arrangements. Any sensitive image-use concerns will be recorded separately and securely using CPOMs, with access limited to staff who need to know in order to safeguard the child or manage image use appropriately.

13. Consent will be requested on admission and at key transition points or for specific activities/events and reviewed when circumstances change. Parents and carers can update their consent record at anytime by contacting the school office.

14. Where consent is refused, restricted or withdrawn, Tenterden Primary Federation will update its records promptly and take reasonable steps to stop further use of the relevant images and remove them from Tenterden Primary Federation-controlled platforms where practicable.

15. Where people with parental responsibility disagree about image use, or where the position is unclear, Tenterden Primary Federation will take a cautious approach and avoid using the image for the disputed purpose until the matter is resolved or appropriate advice has been sought.

Safety of images

16. Tenterden Primary Federation recognises that images and videos shared online may be copied, downloaded, scraped, altered, manipulated, redistributed or reused without the school's knowledge or consent. This includes potential misuse through artificial intelligence and other digital tools.

17. Decisions about taking, storing and publishing images will be made using a safeguarding-first approach, considering whether the image is necessary, proportionate and the least

identifiable option available. This may include reducing identifiable information, using images that are harder to misuse, applying privacy settings, removing metadata and embedding image security awareness within staff training and policies.

18. All official images taken or processed by or on behalf of Tenterden Primary Federation will be taken using school/setting-approved equipment, accounts, platforms and systems wherever possible. Where this is not possible, staff will gain prior permission from a member of SLT.

19. Staff will receive information regarding safe and appropriate image use as part of induction and regular safeguarding, online safety and data protection training. This will include consent, lawful basis, storage, publication, online sharing risks, AI-enabled image manipulation, personal devices, and how to recognise and respond to concerns involving image misuse, alteration, non-consensual sharing or threats involving images.

20. Staff will:
    - only take, use or publish images where there is a clear Tenterden Primary Federation purpose and the relevant consent, lawful basis and safeguards have been checked.
    - ensure that a senior member of staff is aware that official images are being taken and for what purpose.
    - take account of the child's wishes and feelings wherever possible and appropriate, particularly where images are used for publication, publicity or wider sharing.
    - avoid taking images in one-to-one situations unless there is a clear, agreed and necessary reason for doing so.
    - report concerns about image use promptly in line with safeguarding, data protection, whistleblowing or other relevant procedures.

21. Staff will not
    - take images of child(ren) for personal use.
    - use personal devices, personal accounts or personal communication channels to take, store or share images of child(ren) except in exceptional circumstances with prior agreement with a DSL/ headteacher. Images on personal devices will be transferred to the google drive at the earliest opportunity and deleted from the personal device. This will be verified by a DSL.
    - display, distribute or publish images unless authorised and the relevant consent or lawful basis has been checked.
    - take images of child(ren) in a state of undress or semi-undress, or images which could reasonably be considered inappropriate, indecent or sexual.
    - take photographic, video or audio evidence of child(ren)'s injuries, marks, bruising, disclosures or similar safeguarding concerns except where requested by a member of the safeguarding team. These images must only be saved on CPOMs. Concerns must be recorded and reported in line with the Tenterden Primary Federation child protection policy and procedures.

22. All members of staff, including volunteers, will ensure official images are available for scrutiny and that they can justify the purpose, storage and use of any official images in their possession.

23. In school, the site team may use their work phone to take images of the site. These images must not contain any children and will be transferred and stored on the google drive. Once transferred they will be deleted from the phone. At any point, a member of SLT may review the phone and any stored images in line with the school Safeguarding and Child Protection policy.

Storage, retention and review of images

24. Images will only be retained when there is a clear and agreed purpose for doing so.

25. Images will be stored securely on approved Tenterden Primary Federation systems, with access limited to authorised staff who need to use them for a legitimate purpose.

26. Images will not be stored on staff personal devices, personal cloud accounts, personal email accounts or personal messaging apps.

27. Where images are temporarily stored on cameras, memory cards, portable devices or other equipment, they will be transferred to an approved secure system as soon as practicable and deleted from the original device unless there is a clear and authorised reason for temporary retention.

28. Portable storage devices will only be used where authorised and where appropriate safeguards are in place, such as encryption, password protection, logging and secure deletion.

29. Tenterden Primary Federation will carry out regular, documented reviews of images used on websites, social media channels, displays, newsletters, prospectuses, promotional materials, apps and other platforms. Reviews will consider whether images remain necessary, whether consent or another lawful basis still applies, whether individuals have left the setting, whether safeguarding circumstances have changed, and whether images should be removed or replaced. *This will be carried out at least annually by the ICT Manager and a member of the DSL team.*

30. Images will be securely deleted, destroyed or archived in line with the school/setting's retention schedule when they are no longer required.

31. The Headteacher, DPO and/or DSL may request access to official images and may withdraw or amend a member of staff's authorisation to take, use or share images at any time where concerns arise regarding safeguarding, professional conduct, policy compliance or data protection.

32. Any apps, websites, cloud services, learning platforms or third-party companies used to share, host, print, store or access child(ren)'s images will be risk assessed before use. Where required, a Data Protection Impact Assessment (DPIA) will be completed.

Safe Practice when taking images

33. Careful consideration will be given before involving very young child(ren), child(ren) with additional needs, or child(ren) who may be more vulnerable, particularly where they may be less able to understand or question why images are being taken.

34. Tenterden Primary Federation will discuss image use with child(ren) in an age-appropriate way and will support them to understand that they have a right to say no to being photographed or recorded wherever possible.

35. Photography or video recording is not permitted in sensitive areas such as toilets, changing areas, intimate care areas, sleeping areas, swimming areas or other locations where privacy and dignity may be compromised.

36. Images or videos that include child(ren) will be selected carefully and will only be used where they are appropriate for the intended purpose.

37. Child(ren) will be appropriately dressed in any images used by the Tenterden Primary Federation. Particular care will be taken when selecting images from PE, swimming, performances, residential visits or other activities where privacy, dignity or context may be more sensitive.

38. Images taken during off-site activities, trips, residential visits or events will be managed in line with this policy. Staff will be clear about which devices may be used, how images will be stored, whether child(ren) may take their own photographs or recordings, and how images will be reviewed before any sharing takes place.

Publication and sharing of images

39. When selecting images for publication or sharing, Tenterden Primary Federation will consider whether the image is necessary, proportionate and appropriate for the intended purpose.

40. Where possible, Tenterden Primary Federation will use images that reduce identifiability, such as group images taken from a distance, over-the-shoulder images, images of work or activities, displays, or images where child(ren)'s faces are not clearly visible.

41. Where images are published online, Tenterden Primary Federation will avoid using full names or unnecessary identifying information. In most cases, child(ren) who are pictured will not be named. If there is a clear reason to use a child's full name alongside their image, specific consent will be sought first.

42. Tenterden Primary Federation will not include personal addresses, personal email addresses, telephone numbers or other unnecessary contact information in images, captions, videos, websites, prospectuses or other publications.

43. Where images are shared online, Tenterden Primary Federation will consider whether public sharing is necessary or whether a more restricted method of sharing can be used. Where appropriate, privacy settings, closed platforms, password-protected areas or limited-access groups will be used to reduce the visibility and onward sharing of child(ren)'s and staff images

44. Where appropriate and proportionate, Tenterden Primary Federation will consider practical measures to reduce the risk of images being copied, altered or misused. This may include removing metadata, using lower-resolution images, applying watermarking, limiting downloads where possible, reviewing privacy or access settings, and regularly removing images that are no longer needed. These measures cannot remove all risk but may help reduce the likelihood or impact of misuse.

45. Before any image or video of child(ren) is published or shared publicly, it should be checked by an appropriate member of staff to ensure it is suitable, proportionate and does not include inappropriate, sensitive or unnecessary identifying information. This should include checking that child(ren) are appropriately dressed and that consent/lawful basis has been considered. Where there is any uncertainty, the image should not be published until advice has been sought from the DSL, DPO or relevant senior leader.

Use of apps, systems and platforms to share images with parents/carers

46. Tenterden Primary Federation uses Dojo to upload and share images of child(ren) with parents/carers.

47. The use of Dojo has been appropriately risk assessed and is an education approved platform. Where required, a DPIA has been completed.

48. The headteacher has taken steps to ensure that data and images stored or shared through the system are handled in accordance with data protection legislation and the Tenterden Primary Federation safeguarding, online safety and image use policies.

49. Images uploaded to Dojo will only be taken on school/setting-approved devices, accounts and systems.

50. Staff, parents/carers and other authorised users will be provided with clear expectations regarding safe and appropriate use before access is given. This will include expectations regarding passwords, access sharing, downloading, copying, screenshotting, onward sharing and reporting concerns.

Use of Video Surveillance, including CCTV

51. Any use of video surveillance, including CCTV, webcams used for surveillance purposes, doorbell-style cameras, body-worn cameras or other recording technologies, will be considered carefully and managed in line with data protection legislation and relevant Information Commissioner's Office guidance.

52. Video surveillance will only be used where it is necessary, proportionate and justified for a clearly defined purpose, such as site security, controlling access, deterring or detecting crime, supporting health and safety, managing premises, investigating incidents or supporting wider safeguarding or safer working arrangements.

53. Tenterden Primary Federation will not assume that CCTV is automatically the best or only solution. Before installing or continuing to use video surveillance, leaders will consider whether the same aim could be achieved through less intrusive measures, such as improved supervision, staffing arrangements, site management, access controls, safer working practice, whistleblowing arrangements or clearer behaviour expectations.

54. Tenterden Primary Federation will identify and document an appropriate lawful basis for using video surveillance and will consider whether a DPIA is required.

55. Individuals will be clearly informed that video surveillance is in use before entering monitored areas. Signage and privacy information will explain why recording is taking place, who is responsible for the system, how recordings may be used, who may access them and how long they will be retained.

56. Cameras will be positioned carefully and sensitively. They will not be placed in areas where individuals have a high expectation of privacy, such as toilet cubicles, changing areas or intimate care spaces.

57. Particular care will be taken where cameras are near toilets, changing rooms, sleeping areas or other sensitive parts of the setting to ensure privacy and dignity are protected.

58. Recordings will be stored securely, accessed only by authorised individuals and retained only for as long as necessary. The default retention period will be **[insert period, for example 30 days]**, unless there is a clear reason to retain footage for longer, such as an incident, safeguarding concern, complaint or investigation.

59. The continued use of video surveillance will be reviewed regularly. Leadership reviews will consider whether the system remains necessary and proportionate, whether cameras are positioned appropriately, whether signage and privacy information remain accurate, whether access to footage is properly controlled, and whether surveillance is supporting, rather than replacing, strong safeguarding, supervision and safer working practice.

Use of webcams

60. Webcams or similar video technology may be used for remote learning, curriculum activities, communication with families, site security or surveillance.

61. Tenterden Primary Federation will be clear about the purpose of webcam use, who will be able to access the images or recordings, whether sessions will be recorded, and how images, video or audio will be stored and protected.

62. Where webcams are used for surveillance or security purposes, they will be treated in the same way as other forms of video surveillance.

63. Where webcams are used for curriculum purposes, online learning, meetings or communication, safeguarding, privacy and data protection risks will be considered before use.

64. Child(ren), parents/carers and staff will be given clear information about why webcams are being used, whether cameras are expected to be switched on, whether sessions will be recorded, how images or recordings will be used, and what expectations apply to screenshots, private recordings or onward sharing.

65. Where webcam use involves recording identifiable child(ren), staff or families, Tenterden Primary Federation will identify an appropriate lawful basis and ensure that consent arrangements are clear where consent is being relied upon.

66. Recordings will only be made where there is a clear and justified purpose. They will be stored securely, accessed only by authorised individuals and retained only for as long as necessary.

67. Particular care will be taken where webcams may capture private and/or home environments, vulnerable child(ren) or families, one-to-one work, intimate care areas, sleeping areas, changing areas or any other context where privacy and dignity may be more sensitive.

Use of images by parents/carers

68. Parents/carers may take photographs or video footage of their own child(ren) at school/setting events for personal and family use, unless advised otherwise by the school/setting.

69. Parents/carers are expected to follow any instructions given by staff before, during or after an event regarding photography or filming. Tenterden Primary Federation may restrict or refuse photography or filming where this is necessary for safeguarding, privacy, dignity, health and safety or operational reasons.

70. Where photographs or videos also include other child(ren), staff, families or visitors, parents/carers are expected not to share these images publicly or upload them to open social media without permission.

71. Parents/carers are not permitted to take photographs or video recordings in sensitive areas of Tenterden Primary Federation, including toilets, changing areas, intimate care areas, swimming areas, sleeping areas or any other area where privacy and dignity may be compromised.

72. Parents/carers are asked not to copy, download, screenshot, redistribute or publicly share images taken or provided by Tenterden Primary Federation unless permission has been given. This includes images shared through websites, social media, newsletters, learning journals, parent/carer platforms or other Tenterden Primary Federation systems.

73. Parents/carers who attend activities, trips or events in an official or volunteer capacity are expected to follow Tenterden Primary Federation safeguarding, confidentiality, image use, acceptable use and data protection procedures. This does not prevent parents/carers from taking photographs or videos of their own child(ren) for personal and family use where this is permitted by Tenterden Primary Federation. Parents/carers and volunteers must not take photographs or recordings on behalf of Tenterden Primary Federation, or of other child(ren) in their volunteer capacity, using personal devices.

74. Any concerns about photography, filming or the sharing of images should be reported to the DSL, DPO, headteacher/manager or another relevant senior leader.

Use of images by children

75. Tenterden Primary Federation will discuss and agree age-appropriate acceptable use rules with child(ren) regarding the use of cameras and devices, including where and when images may be taken. This will include places children cannot take cameras, for example unsupervised areas, toilets etc.

76. Child(ren) will be taught, in an age-appropriate way, to ask permission before taking images of others and to understand that everyone has the right to say no to being photographed or recorded.

77. Child(ren) will not be permitted to use cameras or image-capturing devices in sensitive areas such as toilets, changing areas, sleeping areas, swimming areas or other spaces where privacy and dignity may be compromised.

78. The use of personal devices by child(ren), including mobile phones, wearable technology, tablets, digital cameras and smart technology, is covered within the Tenterden Primary Federation mobile phone and smart technology policy and acceptable use arrangements.

79. Staff will ensure child(ren) are appropriately supervised when taking images for official or curriculum use.

80. Images taken by child(ren) for official Tenterden Primary Federation use will be treated as setting-controlled image use and will be managed in line with this policy.

81. Parents/carers will be informed where child(ren) may take images of other child(ren) as part of setting-led learning activities, and how these images will be managed.

82. Images taken by child(ren) for official or curriculum use will be checked before being displayed, shared with parents/carers, uploaded to online systems or shown on digital screens.

Use of images of children by the media/press

83. Where press or media attendance is planned, Tenterden Primary Federation will consider carefully how access will be managed before any photography, filming or interviews take place.

84. Images taken by the press or media may be published more widely than Tenterden Primary Federation-controlled images, including online, in print and through social media channels. Once published, Tenterden Primary Federation may have limited control over how images are shared, copied or reused.

85. Appropriate consent will be obtained before child(ren) are photographed, filmed or interviewed by the press or media. Where a parent/carer does not give consent, or where a child does not wish to be involved, this will be respected.

86. Particular care will be taken where child(ren), families or staff may be more vulnerable if identified, including child(ren) in care, adopted child(ren), child(ren) subject to safeguarding plans or court orders, or families affected by domestic abuse, stalking, harassment or other safety concerns.

87. Press and media organisations may process personal information for journalistic purposes, and data protection law includes exemptions in some circumstances for journalism. However, this does not remove Tenterden Primary Federations responsibility to manage access to child(ren) safely, check consent, consider safeguarding risks and communicate clearly with families.

88. Where press or media attendance is planned, Tenterden Primary Federation will agree expectations in advance. This may include confirming who will attend, checking identification on arrival, agreeing which child(ren) may be photographed or interviewed, limiting detailed captions, avoiding full names where possible, and ensuring staff are available to supervise media activity.

89. The identity of any press representative will be verified on arrival. Access will only be permitted where the event is planned and where press or media representatives have been specifically invited to attend.

90. Unscheduled press or media visits will not be authorised without approval from the headteacher or other designated senior leader.

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

91. External photographers engaged to record events or take images on behalf of Tenterden Primary Federation must agree to work in line with Tenterden Primary Federation safeguarding, image use, confidentiality and data protection expectations.

92. Where an external photographer processes images on behalf of Tenterden Primary Federation, Tenterden Primary Federation will usually remain responsible for deciding why and how images are used. In these circumstances, the photographer or videographer is likely to be acting as a data processor, and a written contract/agreement will be in place, so both parties understand their responsibilities and liabilities. The agreement will make clear the purpose of the photography /filming, what images may be taken, how they will be stored, who may access them, how long they will be retained and how they will be securely deleted or returned to Tenterden Primary Federation.

93. Images taken by external photographers must not be used for any other purpose, shared with third parties, uploaded to personal or unauthorised platforms, or used in the photographer's own publicity unless this has been specifically agreed and appropriate consent is in place.

94. Tenterden Primary Federation will satisfy itself that any external photographer can handle images safely and securely, including in relation to confidentiality, secure storage, transfer of images, deletion arrangements, use of assistants/sub-contractors and any online galleries or ordering systems.

95. External photographers will not have unsupervised access to child(ren).

96. Staff, parents/carers or volunteers taking photographs or videos on behalf of Tenterden Primary Federation will be treated as acting in an official capacity and must follow Tenterden Primary Federation safeguarding, confidentiality, image use and data protection expectations. In these cases, official images will be taken, stored and transferred using Tenterden Primary Federation-approved equipment, accounts and systems.

Policy breaches and concerns

97. Members of Tenterden Primary Federation community should report concerns about image use or breaches of this policy in line with existing procedures. This may include reporting to the headteacher, DSL, DPO or another designated senior leader, and following child protection, data protection, behaviour, complaints, whistleblowing or other relevant procedures.

98. If Tenterden Primary Federation becomes aware that an image or video of a child or member of staff has been misused, altered, shared without consent, used in a threat, or used in a way

that raises concern, this will be treated as a safeguarding and/or data protection concern and/or criminal offence as appropriate.

99. Tenterden Primary Federation will prioritise the safety, dignity and emotional wellbeing of any child or adult affected.

100. Staff will report any concerns immediately to the DSL, DPO and/or senior leadership team, in line with child protection, data protection, behaviour, whistleblowing and complaints procedures as appropriate.

101. Tenterden Primary Federation will record the concern and consider whether a safeguarding issue, criminal offence and/or personal data breach has occurred.

102. Tenterden Primary Federation will seek appropriate advice and make referrals or reports to relevant agencies where required. This may include children's social care, the police, the Local Authority Designated Officer (LADO), the ICO or other commissioned legal/data protection advisers.

103. Staff should not copy, forward, screenshot, download, save, print, further share or delete relevant content unless advised to do so by an appropriate safeguarding, police or data protection professional. Where evidence needs to be preserved, this should be done securely, proportionately and only by authorised staff.

104. Where threats, blackmail, extortion or suspected criminal activity are involved, Tenterden Primary Federation will seek urgent police and safeguarding advice and will not engage with demands made by individuals attempting to exploit or threaten Tenterden Primary Federation community.

105. Tenterden Primary Federation will consider immediate steps to reduce further access to relevant images. This may include removing images from Tenterden Primary Federation-controlled platforms, requesting removal from websites or social media services, restricting access, reviewing whether a data breach assessment is required, and identifying what support is needed for affected child(ren), families and staff.

106. Following any breach or concern, leadership staff will review what happened, support affected individuals and consider whether changes are needed to policy, consent processes, staff training, image storage, website/social media use, platform controls or wider safeguarding practice.

107. Action will be taken in line with existing Tenterden Primary Federation policies and procedures, which may include child protection, anti-bullying, mobile and smart technology, acceptable use, behaviour, staff conduct, allegations, low-level concerns, whistleblowing, complaints and disciplinary policies.

Why does our school/setting need an image use policy?

Photographs and videos are often used in education settings to celebrate children's achievements, record learning, share special events and promote the life of the school/setting. Families often value seeing these moments in displays, newsletters, websites or other communications.

Our image use policy helps us make sure photographs and videos are taken, stored and shared safely, respectfully and lawfully. It also helps parents/carers make informed decisions about consent.

What are the risks?

Most images are used positively and safely. However, sharing images publicly can sometimes create risks, particularly where a child, family member or member of staff can be identified.

For example, some children, families or staff may be at risk if their image or location is shared publicly. This may include children in care, adopted children, families who have fled domestic abuse, or adults and children experiencing harassment, stalking or unwanted contact. In some cases, images may also attract the attention of people who may seek to harm or exploit children.

There are also newer online risks. Images shared online may be copied, saved, altered or misused without permission. National guidance has highlighted concerns about publicly available images being manipulated using artificial intelligence and other digital tools.

These risks are not intended to cause unnecessary alarm, but they are important to consider so that images can be used in a safe and proportionate way.

Why are education settings reviewing how images are shared?

The online environment has changed. Once an image is shared publicly, it can be difficult to control how it is copied, downloaded, shared or reused. This does not mean we should stop using images altogether, but it does mean we need to think carefully about when, where and how they are shared.

We will consider whether public sharing is necessary, whether a less identifiable image could be used, and whether safer options are available, such as secure platforms, images of activities or work, or group images where children are less identifiable.

What about the school/setting website and social media?

Where we use images on our official website, social media or other public channels, we will take steps to reduce risk. This may include avoiding children's full names, limiting identifying information, using images where children are less identifiable, checking consent, removing metadata where possible and regularly reviewing images so they are not kept online longer than necessary.

If a child is pictured, we will usually avoid naming them. If a child is named, we will usually avoid using their image.

Can I take photos or videos of my child at school/setting events?

Parents/carers often want to take photos or videos of their own children at events such as performances, sports days or celebrations. The Information Commissioner's Office explains that data protection law does not stop parents/carers taking photos or videos for their own personal or household use. However, schools and settings can set their own expectations for safeguarding, child protection, privacy or health and safety reasons.

The concern is usually not parents taking photos of their own child for personal memories. The concern is when photos or videos also include other children, staff or families and are then shared more widely, especially on social media. You may not know who is vulnerable, who does not want their image shared, or where sharing an image could create a safeguarding or privacy concern.

Sharing images privately with close family and friends is usually likely to remain personal use. However, sharing images publicly, or with an indefinite number of people, may go beyond personal use. The safest approach is not to share photos or videos publicly if they include other people's children, unless you have their parent/carer's permission.

What can parents/carers do to help?

You can help us keep children, families and staff safe by respecting our image use policy, following any instructions at events, not sharing images of other people's children publicly, and speaking to us if you have any concerns about your child's image being used.

If your family circumstances change, or if you wish to change or withdraw consent, please let us know in writing so that we can update our records.

Dear Parent/carer

At Tenterden Primary Federation we sometimes use photographs and videos to record learning, celebrate achievements, share special events and reflect the wider life of our school. Images can be a positive way of helping children and families remember experiences, recognise progress and feel part of the Tenterden Primary Federation community.

Images may be used in displays, newsletters or printed publications, learning journals, secure parent/carer platforms, our official website or social media channels, and for media or publicity where appropriate.

Images of identifiable children are personal data and must be handled carefully in line with data protection legislation, including the UK GDPR and the Data Protection Act 2018. We are asking you to complete the attached consent form so that we know how you are happy for your child's image to be used.

Some images may also be used for necessary internal educational, safeguarding, security or administrative purposes. Where this applies, the school/setting will identify an appropriate lawful basis and ensure images are handled securely, accessed only by those who need to see them, and used only where necessary and proportionate.

We recognise that images shared online may be copied, saved, altered or misused without our knowledge, including through artificial intelligence or other digital tools. We therefore take a safeguarding-led approach to image use and will consider whether an image is necessary, how identifiable children are, where it will be shared, how long it will be kept and whether a safer alternative could be used. Where possible, we will avoid using children's full names alongside their images.

We understand that some families may have particular reasons for wanting to protect a child's identity, including safeguarding, family, cultural, religious, privacy or personal reasons. If circumstances change, or if you wish to refuse, restrict or withdraw consent at any time, please let us know in writing so that we can update our records.

Where appropriate, we encourage you to talk to your child about the consent choices, as children should be involved in decisions about how their images are used wherever possible.

Our relevant policies, including image use, online safety and mobile/smart technology, are available on request or via the school website.

Please read and complete the attached form. If you have any questions or would like to discuss your child's image use, please contact us.

Yours sincerely,

Tina McIntosh
Executive Headteacher

Parental Consent for Use of Images at Tenterden Primary Federation

Please complete this form to let us know how you are happy for your child's image to be used.

Conditions of use

- This consent will apply while your child attends Tenterden Primary Federation, unless you withdraw or change it sooner.
- Consent can be refused, restricted or withdrawn at any time by informing Tenterden Primary Federation in writing.
- Images of identifiable children are personal data. We will use the information on this form to record your consent choices and to help ensure images are taken, used, stored, shared and deleted in line with our safeguarding, image use and data protection procedures.
- Some images may be used for necessary internal educational, safeguarding, security or administrative purposes. These images will be handled in line with data protection legislation and Tenterden Primary Federation policies. They will be accessed only by those who need to see them, stored securely and used only where necessary and proportionate.
- We will not normally continue to use images of your child after they leave Tenterden Primary Federation unless we have a clear reason to do so and appropriate consent remains in place.
- Where children's images are published online, we will avoid using full names or unnecessary identifying information. In most cases, children who are pictured will not be named. If there is a clear reason to use a child's full name alongside their image, specific consent will be sought first.
- Where possible, we will use images that reduce identifiability, such as over-the-shoulder images, group photographs from a distance, images of activities, displays or children's work.
- We will only use images where children are appropriately dressed and where the image is suitable for the intended purpose.
- We will talk to children about image use in an age-appropriate way and take their wishes and feelings into account wherever possible.
- Images shared online may be copied, saved, altered or misused without Tenterden Primary Federations knowledge. We will take steps to reduce these risks, including limiting identifying information, considering safer image choices and reviewing images that are no longer needed.
- Images will be taken, stored, used, shared and deleted in line with our safeguarding, online safety, image use, data protection and other relevant policies.
- Parents/carers are encouraged to contact us if they have any questions or concerns about image use, or if family circumstances change in a way that may affect consent.

Consent choices

Please circle your answer.

May we use your child's image in displays around Tenterden Primary Federation?	Yes / No
May we use your child's image in newsletters, printed publications, prospectuses or other materials produced by Tenterden Primary Federation?	Yes / No
May we use your child's image on our official Tenterden Primary Federation website?	Yes / No
May we use your child's image on our official social media channels, Facebook and Instagram?	Yes / No
May we use, record or share your child's image as part of appropriately risk assessed and managed online learning, video conferencing or webcam-based curriculum activities?	Yes / No
May we use, record or share your child's image as part of online broadcasts or recordings of performances, assemblies, celebrations or events?	Yes / No
May your child appear in media coverage, for example where a newspaper photographer, journalist or television crew attends an event?	Yes / No
May we share your child's image with parents/carers through our approved secure learning journal/parent/carer platform, Dojo?	Yes / No

Parent/carer declaration

I/we have read and understood the information above and the accompanying letter.

I/we understand that public websites and social media can be viewed widely and that images shared online may be copied, downloaded, altered or reused without Tenterden Primary Federation's knowledge or consent. I/we understand that Tenterden Primary Federation will take steps to reduce these risks, including limiting identifying information, reviewing where images are shared, using safer image choices where possible, and removing images when they are no longer needed or consent no longer applies.

I/we understand that where the press or media are invited to attend an event, Tenterden Primary Federation will seek appropriate consent and take reasonable steps to agree how children's names, images and other personal information will be used. I/we also understand that media organisations may process information for journalistic purposes.

I/we will discuss image use with my/our child where appropriate and support them to share their views.

I/we understand that if I/we take photographs or videos at Tenterden Primary Federation events these should be for personal and family use only. If these photographs or videos include other children, staff or families, I/we understand these should not be shared publicly or uploaded to open social media without permission.

Restrictions, concerns or specific circumstances

If there are any restrictions, concerns or specific circumstances which may affect how your child's image is used, please contact us directly so that this can be discussed and recorded appropriately. Please do not include sensitive information on this form.

Name of child: _____ Date: _____

Parent/carer name: _____

Parent/carer's signature: _____

Child's signature (if appropriate): _____

Tenterden Primary Federation Guide to Using Images Safely and Responsibly

Photographs and videos are a lovely way to capture special moments, celebrate achievements and remember events. Families often value being able to take images of their own children at performances, sports days, celebrations and other school/setting events.

We are happy for parents/carers to take photographs and videos of their own child(ren) for personal and family use, unless we tell you otherwise. The concern is usually not families taking images for personal memories, but where photos or videos also include other children, staff, families or visitors and are then shared more widely, particularly online.

Please remember that not everyone wants, or is able, to have their image shared publicly. Some children, families or staff may be at risk if their image or location is shared. This may include children in care, adopted children, families who have experienced domestic abuse, or adults and children who may be at risk of harassment, stalking or unwanted contact. Not all members of the community will know who may be vulnerable or who does not want their image shared.

Images and videos shared online may also be copied, saved, altered or misused without permission, including through artificial intelligence or other digital tools. Once an image has been shared publicly, it can be difficult to control how it is used.

To help keep our whole community safe, please:

- take photographs and videos for personal and family use only;
- avoid sharing images publicly if they include other people's children, staff or families;
- do not upload images or videos to open social media if they include staff or other people's children without permission;
- follow any instructions given by staff at events;
- speak to us if you have any concerns about images being taken or shared.

Thank you for helping us celebrate special moments while respecting the privacy and safety of children, families and staff.

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

- Information Commissioner's Office: https://ico.org.uk/for-the-public/schools/photos
- NCA-CEOP: www.ceopeducation.co.uk/parents
- Internet Matters: www.internetmatters.org
- Childnet: www.childnet.com

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

We are happy for parents and carers to take photos and videos of their own child(ren) at this event for personal and family use.

Please remember that photos and videos may also include other children, staff, families or visitors. We ask that images are not shared publicly or uploaded to open social media if they include other people's children, staff or families without permission.

Some members of our community may be at risk if their image or location is shared.

Thank you for helping us respect and protect everyone.

Tina McIntosh, Executive Headteacher

Tenterden Primary Federation Staff Photograph and Image Consent Form

Tenterden Primary Federation may wish to use staff images for agreed school purposes, such as staff recognition, internal displays, intranet/learning platforms, the school website, newsletters or official social media channels.

Images of identifiable staff are personal data and must be handled in line with data protection legislation, including the UK GDPR and the Data Protection Act 2018. Consent should be specific, informed and capable of being withdrawn.

Please complete this form to let us know how you are happy for your image to be used.

Conditions of use

- This consent will apply for the duration of employment, unless you withdraw or change it sooner.
- Consent can be refused, restricted or withdrawn at any time by informing the school office in writing.
- Some images may be used for necessary internal operational, security, safeguarding or administrative purposes, such as ID badges, access control, staff management systems, internal safeguarding or security records, or similar necessary internal uses. These uses may not rely on consent, but Tenterden Primary Federation will identify an appropriate lawful basis, handle images securely and use them only where necessary and proportionate.
- This consent form relates to optional uses of staff images, internal displays, website profiles, newsletters, publicity or social media.
- You do not have to agree to optional use of your image, and choosing not to give consent will not disadvantage you.
- Your image will only be used for the optional purposes you have agreed to on this form.
- We will not use your image for any other optional purpose without further consent, unless there is another clear and appropriate lawful basis for doing so.
- Where your image is published online, for example on the school website or official social media channels, it may be viewed widely and could be copied, saved, altered or misused without the school's knowledge or consent. We will take reasonable steps to reduce risks, including limiting unnecessary identifying information, using appropriate images, reviewing images regularly and removing images when they are no longer needed or consent no longer applies.
- We recognise that some staff may have personal, safeguarding, privacy or safety reasons for not wanting their image used or published.
- Publication of your image will normally cease when you leave Tenterden Primary Federation, unless there is a clear reason to retain or continue using it and appropriate consent or another lawful basis remains in place.

- Images will be taken, stored, used, shared and deleted in line with our data protection, safeguarding, online safety, image use, acceptable use, social media and mobile/smart technology policies.

Consent choices

Please circle your answer.

	Consent choice
May we use your image for optional internal staff recognition purposes, such as an internal staff board, intranet profile, learning platform or staff directory?	Yes / No
May we use your image in newsletters, printed publications, prospectuses or other Tenterden Primary Federation materials?	Yes / No
May we use your image on our official website?	Yes / No
May we use your image on our official social media channels, Facebook and Instagram?	Yes / No
May we use your image in press/media coverage of Tenterden Primary Federation events?	Yes / No
May we share your image with approved external providers for agreed Tenterden Primary Federation purposes, where appropriate safeguards are in place?	Yes / No

Staff declaration

- I have read and understood the information above.
- I understand that images published online may be viewed widely and could be copied, saved, altered or reused without Tenterden Primary Federation's knowledge or control. I understand that Tenterden Primary Federation will take reasonable steps to reduce these risks, such as limiting identifying information, using safer image choices where possible, and reviewing or removing images when they are no longer needed.
- I understand that I can refuse, restrict or withdraw consent at any time by informing the office in writing.
- I understand that if I withdraw consent, Tenterden Primary Federation will stop using my image for future purposes and will take reasonable steps to remove it from Tenterden Primary Federation-controlled platforms where practicable. I understand that it may not always be possible to remove images that have already been printed, distributed, archived or shared by third parties.

If there are any restrictions, concerns or specific circumstances which may affect how your image is used, please contact a member of SLT directly so this can be discussed sensitively and recorded appropriately. Please do not include sensitive information on this form.

Name: _____
Signed: _____
Date: _____