



# Birchington CE Primary School

## Image Use Policy

**LEARNING AND GROWING; SAFE IN  
GOD'S LOVE**

**Policy written by:**

**Mr J Forwood - Deputy Headteacher & Deputy DSL**

**Approved by Governing Body in:**

**January 2026**

**Date to be reviewed:**

**September 2026**

**School's Data Protection Lead (DPL):**

**Mr J Forwood, Deputy Headteacher & Deputy DSL**

**School's Data Protection Officer (DPO):**

**Invicta Law Ltd.**

**Governors with joint responsibility:**

**Ms L Bant Chair of Governors & Safeguarding Governor**

**Phil Morley - Safeguarding Governor**

*This policy is based on the Camera and Image Use Policy Template Policy provided by LESAS (LADO Education Safeguarding Advisory Service) - last reviewed August 2025*

## Scope and Aims of the Policy

- This policy seeks to ensure that images and videos taken within and by Birchington CE 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; Child Protection, Anti-bullying, Behaviour, UK GDPR and Data Protection Policy, CCTV, Online Safety Policy (including AUPs), Confidentiality, and relevant curriculum policies including Computing; Personal Social, Health and Education (PSHE); and Relationships, Sex and Health Education (RSHE).
- All aspects of safeguarding, including the use of images, are an integral part of our school's Christian Vision.
- This policy applies to all images, including images captured on our CCTV cameras and still photographs and video content taken by staff at Birchington CE Primary School
- All images taken by Birchington CE Primary School will be used in a manner respectful of the Data Protection Principles. This means that images will be processed:
  - ✓ fairly, lawfully and in a transparent manner
  - ✓ for specified, explicit and legitimate purposes
  - ✓ in a way that is adequate, relevant limited to what is necessary
  - ✓ to ensure it is accurate and up to date
  - ✓ for no longer than is necessary
  - ✓ in a manner that ensures appropriate security

The Data Protection Officer (DPO) within the setting (Invicta Law Ltd) supported by the Designated Safeguarding Lead (Mrs Wilson, Headteacher) and Data Protection Lead (DPL) within the setting (Mr Forwood, Deputy Headteacher) are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the setting. This includes the management, implementation, monitoring and review of the Image Use Policy.

## **Official use of images/videos of children**

### **Parental consent**

- Written permission from parents or carers will always be obtained before images and/or videos of children are taken, used or published except:
  - in relation to images captured on our CCTV cameras which are saved for 27 days on a rolling 27-day period, or longer if necessary - see CCTV policy for retention periods
- Written parental consent will always be sought to take and use photographs offsite for professional, marketing and training purposes. This may be in addition to parental permission sought for onsite images
- Written consent from parents/carers will be kept by the setting 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 an agreed basis when their child starts school. This can be amended at any time by the parent/carer via the school office
- 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 the school will take place using school provided equipment and devices and in line with this and other associated policies, including but not limited to Child Protection and Staff Code of Conduct.
- CCTV images will be saved on our CCTV hard drive or on encrypted data sticks held in the school safe - see CCTV policy for more details
- Staff will receive information regarding the safe and appropriate use of images as part of their data protection and safeguarding training
  - Staff will:

- only publish images of learners where they and their parent/carer have given explicit written consent to do so.
  - only take images where the child is happy for them to do so.
  - ensure that a senior member of staff is aware that the equipment is being used and for what purpose.
  - avoid making images in a one-to-one situation.
- Staff will not
    - take images of learners for their personal use.
    - display or distribute images of learners unless they are sure that they have parental consent to do so (and, where appropriate, consent from the child).
    - take images of learners using personal equipment.
    - take images of learners in a state of undress or semi-undress or which could be considered as indecent or sexual
    - take images of a child's injury, bruising or similar or make audio recordings of a child's disclosure.
- 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. Jonathan Forwood (DPL) in conjunction with the Network Manager 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 - school's computer server - Staff Shared
  - All images will remain on site, unless prior explicit consent has been given by Headteacher 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 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 and will be logged in and out by the Network Manager/DPL/Headteacher, this will be

monitored to ensure that it is returned within the expected time scale. See CCTV policy for specific details on CCTV images

- The Headteacher and DPL 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
- Any apps, websites or third-party companies used to share, host or access children's images will be risk assessed prior to use.
- The school will ensure that images are always held in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act, and suitable child protection requirements, if necessary, are in place
- Photographs 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 DPL or Headteacher and the parent/carer

### **Safe Practice when taking images**

- 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 or videoed 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 room, toilets, 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.

### **Publication and Sharing of Images and Videos**

- Children's' full names will not be used on the school website or other publications, for example newsletters, social media channels, in association with photographs or videos.

- The school will not include any personal addresses/emails/telephone numbers/fax numbers on videos on the website, in a prospectus or in other printed publications.
- Where images that could identify staff or children are published online, the school will ensure any image metadata is removed and lower resolution images are used.

### **Usage of Apps/Systems to Share Images with Parents/Carers**

- The school uses Tapestry (an EYFS Assessment tool) to upload and privately share images of children with parents/carers
- The use of the system has been appropriately risk assessed and the Headteacher, Network Manager and the DPL has taken steps to ensure all data stored is held in accordance with GDPR and the Data Protection Act
- Images uploaded to Tapestry will only be taken on school devices
- All users of Tapestry 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

### **Use of Video Surveillance, including CCTV**

- There will be a range of signs on the school site indicating that CCTV is in operation including a poster with contact details in the main entrance to the school buildings
- Recordings will be retained for 27 days on a rolling 27-day basis in each camera. Some images may be kept for 27 days or longer if the school is instructed to do so by the Police or a Court
- 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.

### **Use of Webcams**

- Pupils do not have access to webcams in school

- Parental consent will be obtained before webcams will be used within the setting environment: for example for remote learning purposes and virtual visitors
- 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.
- Webcams have been installed on some office and all classroom computers so staff can meet remotely using Microsoft Teams and other online meeting apps
- Staff film each other working in the classrooms for educational purposes only

### **Use of images of children by others**

#### **Use of images by Parents/Carers**

- Parents/carers are permitted to take photographs or videos of events for private use only
- 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 can be reserved by the school on health and safety grounds
- Parents/carers are only permitted to take photographs within designated areas of the school. These are the school halls (for performances) and outside at Sports Day.
- The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time
- Parents/carers must not upload any photos or video of pupils, other than their own, or school staff/volunteers, without the expressed permission of all of the parents/carers of those pupils or those adults who are in the image
- Parents/carers may contact the school's Headteacher/DSL or DPL to discuss any concerns regarding the use of images

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

### **Use of images by children**

- The school will discuss and agree age-appropriate acceptable use rules with children regarding the appropriate use of cameras, such as when engaging in remote learning when onsite. This will include places children cannot take cameras, 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's Mobile and Smart Technology 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 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 the school 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
- Permission is sought from parents and carers about consent for their child to be included in press articles and only a pupil's first name will be published alongside images
- If a video is made then separate permission will be sought, as necessary
- 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 may include volunteers such as staff or parents/carers)

- External photographers who are engaged to record any events will be prepared to work according to the terms of the school's policies, including our Online Safety and Child Protection policies
- External photographers will sign an agreement which ensures compliance with 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 and young people

**Policy breaches**

- Members of the school community should report image use concerns regarding image use or policy breaches in line with existing school policies and procedures. This includes informing the Headteacher/DSL or a Deputy DSL.

- Following a policy breach, leadership staff will debrief, identify lessons learnt and implement policy changes as required. Action will be taken in line with existing school policies and procedures which may include Child Protection, Anti-bullying, Mobile And Smart Technology, Online Safety and Acceptable Use of Technology, Behaviour and Staff Code of Conduct 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 Data Protection Officer (DPO) will be contacted, and possibly the ICO if the DPO deems it necessary, and if an allegation has been made against a member of staff, contact will be made with the Local Authority Designated Officer (LADO).

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

## Why do we need a policy?

Education settings have always used photographs as a way of highlighting success, celebrating achievement or seeking publicity for fundraising etc. Families 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.

## 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 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 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. 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. There have been cases of families receiving unwelcome phone calls following appearances in the press or online. However, this is rare, so it is important to have a sense of proportion; we want to celebrate success and achievement but parents and carers must be aware of risks to make an informed decision.

## What about school websites or other online channels?

The same concerns apply to school controlled online sites, channels and platforms, additionally it must be recognised that images of children can be copied, manipulated or changed by another person. We can try to copy protect

images we share and use lower quality images on our website, but this can be bypassed.

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

Taking photos of your own children for your own personal use is okay. The difficulty arises when other children are also filmed, and those images are then shared online. It is important to be aware that some members of our community may be vulnerable or at risk so must not have their image shared online as they could be at risk. You may not know who is at risk, so we need everyone's support to protect our community. It's important to role model positive behaviour for children, so please check you have permission before posting any images online which contain children other than your own or adults. We also ask you do not copy or share images from our website or other channels, without appropriate permission.



# Photo Consent form

Child's name:

Child's Date of Birth:

Dear Parent/carer

This letter explains why we will need to ask for your consent before we are able to take images, including photographs and videos of your child during their time at Birchington Cep School.

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

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

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

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

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

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

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

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

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

Yours sincerely,

Mrs Louise Wilson

Headteacher



# Photo Consent form

1. I give consent for my child's photograph (individual and family group) to be taken so that I can buy them. (The school photographer is Time Photography.)

YES  NO  Signed.....

2. I give consent for a photograph of my child, taken by the school photographer, to be included in the whole class photo so that I can buy it. I understand that other parents or carers of those in the class photo can also buy this photo.

YES  NO  Signed.....

3. I give my consent for photos and videos of my child to be used on the school website (their name will not be used). Please note that the website can be viewed by anyone across the world.

YES  NO  Signed.....

4. I give my consent for photos of my child to be used on the TV screens around school, presentations in Collective Worship and to parents/carers (for example, at Open Days). Their name will not be used.

YES  NO  Signed.....

5. I give my consent for photos of my child to be used in presentations the school gives outside of school. For example, to the Local Authority or local community groups. Their name will not be used.

YES  NO  Signed.....

Please turn over



# Photo Consent form

6. I give my consent for photos of my child, with their name, to be used in classroom and corridor displays.

YES  NO  Signed.....

7. I give my consent for group photos, including my child, to be used in other children's class books. These books may be given to other parents/carers at the end of the school year and also some may be kept in school for reviewing by external agencies (for example, Ofsted)

YES  NO  Signed.....

8. I give my consent for photos of my child, without their name, to be used in permanent photographic displays around the school and for the school to display them until they are replaced (this may be after your child has left the school roll).

YES  NO  Signed.....

9. I give my consent for photos and the name of my child to appear in local newspapers and magazines. Please note that some newspapers may require the child's full name and may store photographs for online use.

YES  NO  Signed.....

10. I give my consent for my child's image to be used for identification purposes should they have a specific dietary or medical need which needs to be communicated to all staff in order to safeguard your child. (These photographs will be displayed in the staff room, office and school kitchen - for dietary reasons, and kept in Health Care Plan folders distributed to SLT, the relevant class teacher and the 1<sup>st</sup> aid area - for medical reasons).

YES  NO  Signed.....

11. I give my consent for photos and videos of my child to be used on the school's Social Media pages (Facebook and Instagram) - their name will not be used. Please note that Facebook and Instagram can be viewed by anyone across the world.

YES  NO  Signed.....

The photos staff take are on school cameras or school mobile phones, and are stored securely on the school server. Once it is no longer necessary to keep the photo it will be deleted from the school servers and, if kept in physical form, shredded.



# Photo Consent form

Please turn over

We will only take images of children who are suitably dressed.

We will discuss the use of images with children in an age-appropriate way and role model positive online behaviour.

All images will be used taken and held in accordance with Data Protection legislation.

All images will be taken and used in accordance with our Image Use, Child Protection, Online Safety (including Acceptable Use), Social Media and Mobile and Smart Technology Policies

Please note that this form is valid for the period of time your child is on roll at Birchington CEP School. Apart from 7, 8 and 11 above, photos will not be kept beyond the time of your child being on roll at the school.

If you wish to make any changes to your consent, please email the school office at [admin@birchington.kent.sch.uk](mailto:admin@birchington.kent.sch.uk) or call the school on 01843 841046, and we will supply you with a new form. It is also on our school website. If you have any questions, please contact the school office.

**Mr Forwood, Deputy Headteacher**

Name of adult who signed for the above consents:

\_\_\_\_\_

Relationship to named child:

\_\_\_\_\_

Date: \_\_\_\_\_



# Staff Consent form

Under data protection rules in place in the UK, called the United Kingdom General Data Protection Regulation ('UK GDPR') and UK Data Protection Act 2018, Birchington CEP School is required to obtain your consent for certain photographs of you to be used by the school and also consent for your name and job role to be included on the school website.

The school does not need to obtain your consent for your photograph and name to be used on internal displays, staff ID badges and the reception TV screens as these are necessary for safeguarding reasons.

Please consider carefully the ramification of not granting consent before you decide.

**Please tick all the relevant boxes, sign each item below and return this form to the school office.**

1. I give consent for my name and job role to be included on the school website. **All staff**

YES  NO  Signed.....

2. I give my consent for photos of myself to be used in permanent photographic displays around the school and for the school to display them until they are replaced (this may be after you have left the school). **All staff**

YES  NO  Signed.....

3. I give my consent for photos of myself to be used in presentations the school gives both inside and outside of school. For example, to the Local Authority, parent/carer Open Evenings or local community groups. Your name will not be used. **All staff**

YES  NO  Signed.....

4. I give my consent for photos and my name to appear in local newspapers and magazines. Please note may store photographs for online use. **All staff**

YES  NO  Signed.....

5. I give consent for a photo of myself, taken by the school photographer, to be included in staff group or whole staff photos. I understand that other staff may receive this photo.

**All staff**    
YES NO Signed.....

6. I give consent for a photo of myself, taken by the school photographer, to be included in whole class photos. I understand that parents or carers of those in the class photo may buy this photo. **Teachers and TAs only**

YES  NO  Signed.....



# Staff Consent form

7. I give consent for my photograph to be included on the school website. **All School Leaders and DSLs**

YES  NO  Signed.....

The photos staff take are on school cameras or school mobile phones, and are stored securely on the school server. Once it is no longer necessary to keep the photo it will be deleted from the school servers and, if kept in physical form, shredded.

Please note that this form is valid for the period of time you work at Birchington CEP School. Apart from 2 above, photos will not be kept beyond the time of you being employed by the school.

If you wish to make any changes to your consent, please email the school office at [admin@birchington.kent.sch.uk](mailto:admin@birchington.kent.sch.uk) or call the school on 01843 841046, and we will supply you with a new form.

**Mr Forwood, Deputy Headteacher**

Name of adult: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



# Governor Consent form

Under data protection rules in place in the UK, called the United Kingdom General Data Protection Regulation ('UK GDPR') and UK Data Protection Act 2018, Birchington CEP School is required to obtain your consent for your name and photograph of you to be included on the school website.

1. I give consent for my name and photo to be included on the school website.

YES  NO  Signed.....

The photos staff take are on school cameras or school mobile phones, and are stored securely on the school server. Once it is no longer necessary to keep the photo it will be deleted from the school servers and, if kept in physical form, shredded.

Please note that this form is valid for the period of time you are a Governor at Birchington CEP School.

If you wish to make any changes to your consent, please email the school office at [admin@birchington.kent.sch.uk](mailto:admin@birchington.kent.sch.uk) or call the school on 01843 841046, and we will supply you with a new form.

**Mr Forwood, Deputy Headteacher**

Name of adult: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# Template school performance letter

Dear Parent/Carer

We are staging a production/special event of **name** on **date**. We are sure some parents/carers would like to take photographs of the production.

Under our school policies, we allow parents and carers to take photographs at school performances as long as they are for personal use only and not shared on any social media unless the parent/carers has the permission of all of the parent/carers of the other children in the image as well as any staff.

However, there is a strong possibility that your child may be included in any photo taken, even if just for personal use. If you would prefer that your child is not included in photos, please inform the class teacher as soon as possible and we can discuss appropriate alternative arrangements to minimise the risk of your child being in photos.

Yours sincerely

Class teacher

## Useful Contacts

Kent County Council's Online Safety Guidance and Information for Education Settings:  
[www.kelsi.org.uk/child-protection-and-safeguarding/e-safety](http://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](http://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](http://www.kelsi.org.uk/child-protection-and-safeguarding)

Surveillance Camera Commissioner:  
<https://www.gov.uk/government/organisations/surveillance-camera-commissioner>

ICO Schools Guides:  
<https://ico.org.uk/for-the-public/schools/>

ICO Information on Data Protection Act for Organisations:  
<https://ico.org.uk/for-organisations/>

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

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

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

- Information Commissioner's Office: <https://ico.org.uk>
- NCA-CEOP: [www.thinkuknow.co.uk/parents](http://www.thinkuknow.co.uk/parents)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Childnet: [www.childnet.com](http://www.childnet.com)