Leigh Primary School

The Green, Leigh, Tonbridge, Kent TN11 8QP
Telephone/Fax: 01732 832660

'Caring, Sharing and Learning Together'

Image Use Policy

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

- Date written: August 2026
- Date of last update: September 2025
- Date agreed and ratified by Governing Body/management committee: September 2026
- 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 procedure

Key Contacts

	Name	Contact Information
Joint Designated Safeguarding Lead (DSL)	Jenna Halfhide (Co-Headteacher) **Maternity Leave September 2026-April 2027* Joanne Shobbrook (Co-Headteacher and Deputy Headteacher) Victoria Short (Inclusion Manager and acting Designated Safeguarding Lead during maternity leave for Jenna Halfhide)	headteacher@leigh.kent.sch.uk (both)
Deputy Designated Safeguarding Lead (DDSL)	Victoria Short (Inclusion Manager)	Victoria.short@leigh.kent.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	Tracey Prockter (Senior Teacher)	Tracey.Prockter@leigh.kent.sch.uk
Co-Headteachers	Jenna Halfhide (Monday to Thursday) Joanne Shobbrook (Friday)	01732 832660
Safeguarding Governor	Sharon Wade	Swade@leigh.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 Leigh Primary School are taken, stored, used and shared legally and safely, with safeguarding, privacy and data protection considered for 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, data security, image use, Acceptable Use Policies, confidentiality, Behaviour and relevant curriculum policies including computing, Personal Development and Sex and Relationships Education (SRE), Online Safety, Mobile, Smart Technology and Social Media, Staff Code of Conduct and CCTV policies.
- This policy applies to all images, including still and video content taken by Leigh Primary School, including images captured, stored or shared through webcams, CCTV, school devices, approved platforms and other technology with imaging or recording capability.
- All images taken by *Leigh 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 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
- The Data Protection Officer (DPO) within the setting (Headteachers) supported by the DDSLs and management team are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the setting. This includes the management, implementation, monitoring and review of the Image Use Policy. The DSL and DPO will also consider emerging safeguarding risks, including online image misuse and manipulation.

Parental consent

- Written permission from parents or carers will normally be obtained before images and/or videos of children are used or published for optional purposes such as publicity, marketing, the school website, social media or press/media activity. Some necessary internal educational, safeguarding, security or administrative uses may rely on another appropriate lawful basis rather than consent.
- 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 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 entry to the school and updated if a new consent or conditions of consent change.
- 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.
- Where people with parental responsibility disagree about an optional use of a child's image, the school will take a cautious approach and will not use the image for that disputed purpose until the position is resolved or appropriate advice has been sought.

Safety of images and videos

- Staff will receive information regarding the safe and appropriate use of images as part of their data protection and safeguarding training. This will include the risks of public online sharing, image manipulation using artificial intelligence and how to report concerns about image misuse.
- 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 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.
- 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. This refers to IPads, memory cards, cameras and hard copies.
  - 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. Staff have permission in line with AUP to take their encrypted work laptops off site which have photographs of children in our SharePoint Office 365.
- 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 DPO and/or DSL; this will be monitored to ensure that it is returned within the expected time scale.
- 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.
- Any apps, websites or third-party companies used to share, host or access children's images will be risk assessed prior to use. A Data Protection Impact Assessment (DPIA) will be completed where required, and the school will consider where data is stored, who can access it and whether uploaded content may be reused by the provider.
- 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 always are held in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act, and suitable child protection requirements, if necessary, are in place.

- 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 to be taken of any images without relevant authority and consent from the DPO and/or DSL and the parent/carer.

Publication and sharing of images and videos

Where appropriate, safer image choices will be used for public sharing, for example group images from a distance, over-the-shoulder photographs, images of activities or work, or images where faces are not clearly visible.

- Before images are published publicly, the school will consider whether public sharing is necessary and whether a less identifiable image or a more restricted method of sharing would achieve the same purpose.
- Children's names will not be used on the website or other publication, for example newsletters, social media channels, in association with photographs or videos, that can be publicly viewed. Where possible, the school will also avoid unnecessary identifying information such as precise locations, routines or other details that could increase risk.
- Names of children will at times be associated with photographs on the school newsletter where it is only circulated to parents of enrolled students to celebrate achievements.
- Children's' full names will not be used on the website or other public viewed documents or marketing material, for example magazine articles and social media channels, in association with photographs or videos.
- The school will not include any personal addresses, emails, telephone numbers, fax numbers on video, on the website, in a prospectus or in other printed publications.

Usage of apps/systems to share images with parents

- Images uploaded to Google Classroom/Facebook/Website will only be taken on school devices.
- The use of the system has been appropriately risk assessed and the governing body has taken steps to ensure all data stored is held in accordance with GDPR and the Data Protection Act.
- Images uploaded to Google Classroom/Twitter/Website will only be taken on school devices.
- All users of these systems 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.

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

Use of Closed-Circuit Television (CCTV)

- All areas which are covered by CCTV 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 60 days (see section 5, CCTV policy) The system automatically destroys data after 60 days.

- 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 will be appropriately placed within the setting.

Use of webcams

- Parental consent will be obtained before webcams will be used within the setting environment for education purposes.
- Where webcams are used with children to access or engage with education (for example remote learning), images and recordings will not be taken/made.
- All areas which are covered by webcams for security or safeguarding purposes (CCTV) will be well signposted, and notifications are displayed so that individuals are advised before entering such vicinity.
- Where webcams are used for video surveillance purposes, recordings will be retained for a limited time only and for no longer than their intended purpose; this will be a for a maximum of 30 days (amend if different). 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 are permitted to take photographs or video footage 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 and make videos can be reserved by the school on health and safety grounds.
- Parents/carers are not permitted to take or make recording unless notified by school staff in non-public areas such as the school premises and St Mary's Church.
- Photography is not permitted in classrooms by parents, visitors or volunteers.
- Photos and videos taken by the school and shared with parents should not be shared elsewhere, for example posted onto social networking sites such as Whatsapp. To do so may breach intellectual property rights, data protection legislation and importantly may place members of the community at risk of harm. Parents/carers should not publicly share images that include other people's children, staff or families without permission.
- Parents may contact the school DPO/DSL to discuss any concerns regarding the use of images.
- Photos and videos taken by the school and shared with parents should not be shared elsewhere, for example posted onto social networking sites such as Whatsapp. 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 photos/videos by children

- The school 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 mobile phone and/or online safety 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.
- 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 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

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

Members of the community should report image use concerns regarding image use or policy breaches in line with existing school/setting policies and procedures. This includes Whistleblowing, complaints, staff discipline and low level concerns dependent upon concern. This includes concerns where images have been copied, altered, manipulated, shared without permission or used in threats, harassment or exploitation.

Policy breaches

- Members of the community should report image use concerns regarding image use or policy breaches in line with existing school/setting policies and procedures. This includes Whistleblowing, complaints, staff discipline and low level concerns dependent upon concern.
- 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/setting policies and procedures which may include child protection, anti-bullying, mobile and smart technology, acceptable use and behaviour policies. Amend as appropriate.
- Advice will be sought, and reports will be made to other organisations in accordance with national and local guidance and requirements. For example, where there may have been a data protection breach, the ICO will be contacted, and if an allegation has been made against a member of staff, contact will be made with the Local Authority Designated Officer (LADO).

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's 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.

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 Code of Practise for CCTV:
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

ICO Information on Data Protection Act for Organisations:
www.ico.gov.uk/for_organisations/data_protection.aspx

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

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

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Disclaimer

Kent County Council make every effort to ensure that the information in this document is accurate and up to date. If errors are brought to our attention, we will correct them as soon as practicable. The copyright of these materials is held by Kent County Council. However, education settings that work with children and young people are granted permission to use all or part of the materials for not-for-profit use, providing Kent County Council copyright is acknowledged and we are informed of its use.
At Leigh Primary School we take photographs and film pupils as part of our core activity of education. During your child's time at Leigh Primary School this occurs as part of normal teaching, learning, assessment and safeguarding procedures and as such we do not need your permission for these activities. Where images are needed for necessary internal educational, safeguarding or administrative purposes, the school will use an appropriate lawful basis and handle them securely.

Consent form for taking and using photos

Dear Parents/Carers,

At Leigh Primary School we take photographs and film pupils as part of our core activity of education. During your child's time at Leigh Primary School this occurs as part of normal teaching, learning, assessment and safeguarding procedures and as such we do not need your permission for these activities.

However, we do seek your permission to take photographs of your child and use them in the ways described below. Please consider carefully the ramification of not granting permission before you decide.

A pupil photograph may be stored securely in Arbor (School Information Management System) where this is necessary for identification, administration or safeguarding. This necessary internal use is managed under the school's data protection arrangements and does not rely on optional consent. This does not affect your choices below about optional use or publication of your child's image.

Where necessary to safeguard a pupil with a specific educational, dietary or medical need, an identification image may be used in restricted staff-only areas or systems.This will only be used where necessary and proportionate, handled securely and removed when no longer required. This necessary safeguarding use does not rely on optional consent.

I give consent for my child's photograph to be taken for the school photographer, (Imago Photography) for individual, group, class and whole school photographs.

YES ☐ NO ☐ Signed…….

I give my consent for photos and videos of my child to be used on the school website (name will be omitted).

YES ☐ NO ☐ Signed…….

I give my consent for photos and videos of my child to be used on the school learning platform (Google Classroom). This is a class page and only accessible by staff and parents of your child's class.

YES ☐ NO ☐ Signed…….

I give my consent for photos/videos of my child to be used on the school's Public Facebook account *(name will be omitted).*

YES ☐ NO ☐ Signed…….

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

YES ☐ NO ☐ Signed…….

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…….

I give my consent for my child's image to be shared with the PTA to use on the PTA Facebook Page, Promotional PDFs sent to the school community through Whatsapps and School Office Email but not retained or stored on any other device after use on this platform (no names will be displayed alongside photographs).

YES ☐ NO ☐ Signed…….

Images of identifiable pupils are personal data. Where the school relies on consent for optional image use, consent must be informed, specific and capable of being withdrawn. Some necessary internal educational, safeguarding or administrative uses may rely on another appropriate lawful basis.

Images of identifiable pupils are personal data and are handled in line with UK GDPR and the Data Protection Act 2018. Consent is requested for the optional uses set out above and can be changed or withdrawn at any time.

Please note: this form is valid for the period of time your child is on roll at Leigh Primary School.

If you wish to make any changes, please email the school office at office@leigh.kent.sch.uk or call the school on 01732 832660, and we will supply you with a new form. If you have any questions, please contact the school office.
We really value using photos of your child to showcase what they do in school and demonstrate what school life is like to other stakeholders and the wider community, so we really appreciate you taking the time to give consent again.

Consent for image use can be given through the Arbor Platform. Including the new consent for sharing images with the PTA for use on their Facebook page.

Jenna Halfhide - Headteachers – LPS
Joanne Shobbroo