KINGS HILL SCHOOL
PRIMARY & NURSERY

Kings Hill School

Primary and Nursery

Image Use Policy

Date of Policy: January 2026

Date of Review: January 2027

Kings Hill School Primary and Nursery

IMAGE USE POLICY

Kings Hill School Designated Safeguarding Lead (DSL): Mrs Kate Harris
Kings Hill School Deputy Designated Safeguarding Leads (DDSL): Mrs McKenzie, Mrs Sally McCarville, Mrs Karen Marshman

Scope and Aims of the Policy

This policy seeks to ensure that images and videos taken within and by Kings Hill School Primary and Nursery are taken and held legally and the required thought is given to safeguarding all members of the community.

This policy applies to all staff including the governing body, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for or provide services on behalf of the school (collectively referred to as 'staff' in this policy) as well as children and parents/carers.

This policy must be read in conjunction with other relevant school policies including (but not limited to) safeguarding and child protection, anti-bullying, behaviour, data security, Acceptable Use Policies, confidentiality, and relevant curriculum policies including computing, Personal Social and Health Education (PSHE) and Relationship and Sex Education (RSE).

This policy applies to all images (including still and video content) taken by Kings Hill School Primary and Nursery. All images taken by Kings Hill School Primary and Nursery will be used in a manner respectful of the eight Data Protection Principles of the GDPR. This means that the use of images will be subject to the following rights:-

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

The Data Controller, DSL and Leadership Team are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within Kings Hill School. This includes the management, implementation, monitoring, and review of this Image Use Policy.

Parental Consent

- Written permission from parents or carers will always be obtained before images or videos of children are taken, used or published by Kings Hill School Primary and Nursery
- Written parental consent will always be sought to take and use photographs offsite for professional, marketing and training purposes. This will be in addition to parental permission sought for onsite images.

- Written consent from parents will be kept by Kings Hill School Primary and Nursery where children's images are used for publicity purposes (such as brochures or publications), until the image is no longer in use.
- The above written parental permission will be sought on admission to Kings Hill School in Nursery or reception and again when the child starts in Year 3. The consent form also forms part of the admission pack for in-year admissions.
- A record of all consent details will be kept securely on file. Should permission be withdrawn by parents/carers, then all relevant images, where possible, will be removed and disposed of and the record will be updated accordingly.

Safety of Images and Videos

- All images taken and processed by Kings Hill School Primary and Nursery will take place using school provided equipment and devices.
- Staff will receive information regarding the safe and appropriate use of images as part of their safeguarding training and responsibilities.
- 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 & videos will not be kept for longer than is to be considered necessary. A designated member of staff (Data Controller) 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 at all times, unless prior explicit consent has been given by both Data Controller and DSL and the parent or carer of any child or young person captured in any photograph.
- Should permission be given to take any images off site then all relevant details will to be recorded, for example who, what, when and why and data will be kept securely (e.g. with appropriate encryption).
- Any memory stick, CD or storage device containing images of children to be taken offsite for further work will be suitably encrypted and will be logged in and out by the Data Controller and/or DSL and this will be monitored to ensure that it is returned within the expected time scale.
- The Data Controller and/or DSL reserve the right to view any images taken and/or to withdraw or modify a member of staffs' authorisation to take or make images at any time.
- Only official setting owned equipment (i.e. school provided cameras, or devices such as ipads) will be used by staff to capture images of children. Use of personal cameras and mobile phones for picture taking of children by staff or visitors is prohibited at all times.
- Any apps, websites or third party companies used to share, host or access children's images will be risk assessed prior to use.
- Kings Hill School will ensure that images & video always are held in accordance with GDPR regulations and suitable child protection requirements (if necessary) are in place.
- Photographs will be disposed of in line with our data retention policy. They will be returned to the parent or carer, if printed, and deleted where possible. Copies will not to be taken of any images without relevant authority and consent from the Data Controller and/or DSL and the parent/carer.

Publication and sharing of images and videos

- Images or videos that include children will be selected carefully for use e.g. only using images of children who are suitably dressed.
- Images or videos that include children will not provide material which could be reused.

- Children's' full names will not be used on the website or other publication (e.g. newsletters, social media channels) in association with photographs or videos.
- Kings Hill School Primary and Nursery will not include any personal details, i.e. addresses, emails, telephone numbers, in videos, on the website, in a prospectus or in other printed publications.
- Kings Hill School Primary and Nursery may post appropriate images of children on our social media pages, (including, but not limited to Twitter & Facebook) where permission has been granted.

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.
- Kings Hill School Primary and Nursery will discuss the use of images with children and young people in an age appropriate way.
- A child or young person's right not to be photographed is to be respected. Images will not be taken of any child or young person against their wishes.
- Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc

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 period only and for no longer than their intended purpose. This is outlined in our data retention policy (except where used for police investigations). All recordings are digital and automatically deleted.
- 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 leadership 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 are used within the setting environment for curriculum or educational purposes.
- Recordings will be retained for a limited time period only and for no longer than their intended purpose.

Use of Photos/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 only permitted to take or make recording within designated areas of the school. Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.
- The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time.
- Parents may contact the school/setting Data Controller/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 without prior consent, to do so may breach intellectual property rights, data protection legislation and importantly may place members of the community at risk of harm. Images that are shared should be done so in discussion with the IT team to ensure that the images are secure and can only be accessed by intended recipients.

Use of Photos/Videos by Children

- Kings Hill School Primary and Nursery 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 (e.g. unsupervised areas, toilets etc.).
- The use of personal devices e.g. mobile phones, tablets, children's own digital cameras, is covered within our AUP and 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.
- Photos taken by children will be for educational use in-line with the schools' curriculum (e.g. photo editing.) If children are completing work that will be published (e.g. on the school website, social media or school newsletter) which contains photos of other children, then we will ensure that permissions already granted for that child's photo will be followed. All images are processed in accordance with the Schools Data Protection Policy which complies with the Data Protection Act (2018) and GDPR requirements (2018).

- 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 by the setting e.g. will be for internal use by the setting only.
- Photos taken by children for official use will be carefully controlled by the setting 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 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 (e.g. 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 have been 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 Professional Photographers

- Professional photographers who are engaged to record any events will be prepared to work according to the terms of our online safety policy.
- Photographers will sign an agreement which ensures compliance with GDPR, and that images will only be used for a specific purpose, subject to parental consent.
- Photographers will not have unsupervised access to children and young people.