



Image Use Policy

Status	Current Policy
Agreed by the Governing Board	Dec 2025
Review Cycle	Annual
Next Review	Dec 2026

Lead Staff	Lloyd Marks
Chair of Governing Body	Alex Krutnik
Headteacher	Jane Hatwell

Vision and Values

Our school vision is to provide an *outstanding, nurturing, learning environment*, where all our pupils can achieve their full potential and progress to lead happy and fulfilling lives.

Our mission is to provide each and every pupil with the best possible education, delivered in an environment that is supportive, caring and safe.

“Getting it right for every pupil”

At Stone Bay we focus on *Evolving Excellence* in all that we do, working towards making our school the best it can be for pupils, staff and families. We are creating lasting *Trust* with all our stakeholders, *Empowering* each other to learn and grow. By adhering to policies and clear processes we ensure *Fairness* and transparency in our decision making and actions, whilst ensuring we are *Collaborating* with others and always looking for ways to help each other to deliver excellence for our pupils.

Rights Respecting Schools

The Unicef UK Rights Respecting School Award (RRSA) is based on principles of equality, dignity, respect, non-discrimination and participation. The RRSA seeks to put the UN Convention on the Rights of the Child at the heart of a school's ethos and culture to improve well-being and develop every child's talents and abilities to their full potential. A Rights Respecting School is a community where children's rights are learned, taught, practised, respected, protected and promoted.

Stone Bay has been awarded the Silver Award by UNICEF. This is awarded to UK schools that show good progress towards embedding children's rights in the school's policy, practice and ethos, as outlined in the RRSA Strands and Outcomes

Staff wellbeing

The Leadership Team and the Governing Board of Stone Bay School are committed to promoting positive mental, physical and emotional wellbeing and to providing suitable support for all staff. Taking action to prevent ill health and promote good health makes good educational and business sense, as sickness absence carries high costs both in monetary terms and in terms of the impact upon performance, teaching and learning, morale and productivity, which may disrupt or compromise pupil progress.

All members of staff are entitled to be treated fairly and professionally at all times. The Governing Board of Stone Bay School takes very seriously its duty of care as an employer to all members of staff and a number of policies and procedures have been made in relation to this duty.

Scope and aims of the policy

1. This policy seeks to ensure that images taken within and by Stone Bay School are taken and held legally and the required thought is given to safeguarding all members of the community.
2. 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.
3. This policy must be read in conjunction with other relevant policies including, but not limited to; child protection, anti-bullying, behaviour, data protection and information, image use, Acceptable Use of Technology Policies (AUPs), confidentiality and relevant curriculum policies including computing, Personal Social and Health Education (PSHE), Citizenship and Relationships and Sex Education (RSE).My social and emotional wellbeing curriculum.
4. This policy applies to all images, including still photographs and video content taken by Stone Bay School.
5. All images taken by Stone Bay School will be used in a manner respectful of the Data Protection Principles. This means that images will be processed:
 - o fairly, lawfully and in a transparent manner
 - o for specified, explicit and legitimate purposes
 - o in a way that is adequate, relevant limited to what is necessary
 - o to ensure it is accurate and up to date
 - o for no longer than is necessary
 - o in a manner that ensures appropriate security
6. The Data Controller within the setting supported by the Designated Safeguarding Lead 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.

Official use of images of children

Parental consent

1. Written permission from children and/or parents or carers will always be obtained before images of children are taken, used or published. Consent forms will be sent out to parents in the initial admissions paperwork.
2. Written consent will always be sought to take and use images offsite for professional, marketing and training purposes. This may be in addition to parental permission sought for onsite images.
3. Written consent from parents will be kept by the school where children's images are used for publicity purposes, such as brochures or publications, until the image is no longer in use.
4. Parental permission will be sought on admission and agreed on a yearly basis.
5. 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.

Consent for staff images

We utilize photographs of staff under the lawful basis of GDPR Legitimate Interests for the following important reasons:

1. **Security:** Staff identification badges facilitate secure access around the school, contributing to the safety and wellbeing of students and staff alike.
2. **Student learning and familiarity:** Seeing photos of their teachers and support staff helps students, especially those with autism or other social-emotional needs, recognize individuals and understand their roles within the school environment. This fosters trust and facilitates communication.
3. **Transitioning students:** New students can access the website beforehand to familiarize themselves with their teachers and other staff members, easing their transition and promoting a sense of comfort and confidence.
4. **Building a sense of community:** Publishing staff photos helps families and students connect with the school community, recognize familiar faces, and feel more involved and supportive of our mission.

Staff have the right to withdraw consent at any time by contacting hr@stone-bay.kent.sch.uk

Safety of images

1. All images taken and processed by or on behalf of 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, Staff Behaviour/Code of Conduct. Acceptable Use Policy
2. Staff will receive information regarding the safe and appropriate use of images as part of their data protection and safeguarding training.
 - o 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.
 - o 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.
3. 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.

4. Images will only be retained when there is a clear and agreed purpose for doing so, and will not exceed Stone Bay School's stated retention periods for staff and students.
5. Images will be stored in an appropriately secure place. Schools network and Evidence me cloud server.
6. Images will remain in school on site, unless prior explicit consent has been given by the DPO and DSL and the parent/carer of any child or young person captured in any images. Should permission be given to take images off site, all relevant details will to be recorded, for example who, what, when and why. Images taken offsite will be kept securely for example with appropriate protection.
7. Any memory stick/storage or 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.
8. 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.
9. Any apps, websites or third-party companies used to share, host or access children's images will be risk assessed prior to use.
10. The school will ensure that images always are held in accordance with the UK General Data Protection Regulations (UK GDPR) and Data Protection Act, and suitable child protection requirements, if necessary, are in place.
11. Images 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

Safe Practice when taking images

1. 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.

2. The school will discuss the use of images with children and young people in an age-appropriate way.
3. 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.
4. Photography or video recording is not permitted in sensitive areas such as changing rooms, toilets, swimming areas etc.
5. Images or videos that include children will be selected carefully for use, for example only using images of children who are suitably dressed.
6. Images of visitors and volunteers: Where school events include visitors, volunteers, or guest speakers, reasonable steps will be taken to inform them that photography or video recording may take place. Where visitors or volunteers feature prominently in images intended for publication, consent will be sought.

Publication and sharing of images

1. Children's' full names will not be used on the school website or other publication, for example newsletters, social media channels, in association with photographs or videos.
2. 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.
3. Staff images in publications: Staff members' full names may be used in association with their images only where there is a clear professional purpose (e.g., staff directory, promotional materials).

Usage of apps/systems to share images with parents

1. The school uses Class Dojo to upload and share images of children with parents.
2. The use of the system has been appropriately risk assessed and the governing body and headteacher have taken steps to ensure all data stored is held in accordance with GDPR and the Data Protection Act.
3. Images uploaded to Class Dojo will only be taken on school devices.

4. All users of Class Dojo are advised on safety measures to protect all members of the community, for example, using strong passwords, logging out of systems after use etc.
5. Parents/carers will be informed of the expectations regarding safe and appropriate use (For example, 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 webcams

1. Parental consent will be obtained before webcams will be used within the setting environment for education purposes.
2. 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.
3. Virtual meetings and online learning:
 - Recording of virtual lessons or meetings will only take place with prior notification to all participants
 - Recordings will be stored securely on either Google, Microsoft or on-site servers.
 - Recordings will be retained for no longer than required and then permanently deleted

Use of image by parents/carers

1. Parents/carers are permitted to take photographs or video footage of events for private use only.
2. Parents/carers who are using photographic equipment must be mindful of others, including health and safety concerns, when making and taking images.
3. The opportunity for parents/carers to take photographs and/or make videos may be reserved by the school on health and safety grounds.
4. Parents/carers are only permitted to take or make recording within designated areas of the school. Photography or filming is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.

5. The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time.
6. Parents may contact the school DPO/DSL to discuss any concerns regarding the use of images.
7. Photos and videos taken by the school and shared with parents 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

1. 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 and when onsite. This will include places children cannot take cameras, for example unsupervised areas, toilets etc.
2. The use of personal devices, for example, mobile phones, tablets, digital cameras, is covered within the school mobile and smart technology policy.
3. 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.
4. Members of staff will role model positive behaviour to the children by encouraging them to ask permission before they take any photos or videos.
5. Images taken by children for official use will only be taken with parental consent and will be processed in accordance with UK GDPR and the Data Protection Act.
6. 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.
7. Images 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.

Use of images of children by the media

1. 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.
2. 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.
3. The identity of any press representative will be verified, and access will only be permitted where the event is planned, and where press are specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances.
4. 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, including videographers and volunteers

1. External photographers who are engaged to record any events officially will be prepared to work according to the terms of our policies, including our child protection policy.
2. External photographers will sign an agreement which ensures compliance with UK GDPR and the Data Protection Act.
3. Images taken by external photographers will only be used for a specific purpose, subject to parental consent.
4. External photographers will not have unsupervised access to children and young people

Policy breaches

1. Members of the community should report image use concerns regarding image use or policy breaches in line with existing school policies and procedures. This includes

complaints, child protection, whistleblowing and behaviour policies. Staff will use our online reporting system Iris Adapt to complete the concern about an adult form.

2. 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, acceptable use and behaviour policies.
3. 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).

AI and Image Manipulation

1. Any use of artificial intelligence (AI) tools or software to edit, enhance or manipulate images of children must be for legitimate educational or administrative purposes only and must be proportionate to the intended use.
2. Acceptable editing includes:
 - o Cropping images to improve composition or remove unnecessary background
 - o Adjusting brightness, contrast or colour correction to improve image quality
 - o Removing red-eye or minor technical imperfections
 - o Blurring backgrounds for safeguarding purposes
 - o Adding text overlays for educational or informational purposes (e.g., captions, dates)
3. Unacceptable editing includes:
 - o Altering a child's physical appearance, features or body shape
 - o Using AI filters that significantly change how a child looks
 - o Creating composite images that misrepresent events or activities
 - o Using deepfake technology or similar AI tools to manipulate images or videos

- o Removing or adding children to images in a way that misrepresents reality
 - o Any manipulation that could be considered disrespectful, harmful or embarrassing to the child
4. All image editing will be carried out by authorised staff members only, using school-approved software and equipment and in line with AI policies.
 5. Staff will maintain a record of any significant editing undertaken, including the purpose and nature of the changes made.
 6. Where AI-powered tools are used for image management (such as automatic tagging, sorting or facial recognition), these tools will be:
 - o Risk assessed prior to implementation
 - o Compliant with UK GDPR and the Data Protection Act
 - o Subject to a Data Protection Impact Assessment (DPIA) where appropriate
 - o Only used with systems that have appropriate data processing agreements in place
 7. Parents/carers will be informed if AI tools are being used to process images of their children, and this will form part of the consent process.
 8. The school will not use AI-generated images that purport to show real children or events that did not occur.
 9. Any concerns about inappropriate image manipulation should be reported immediately to the DPO and/or DSL in line with the policy breaches section of this policy.