



# Shoreham Academy

The best in everyone™

Part of United Learning

<b>Title</b>	<b>Image Use Policy</b>
<b>Policy Owner</b>	<b>Tim Harkins</b>
<b>Effective Date</b>	<b>December 2025</b>
<b>Last Revised</b>	<b>December 2025</b>
<b>Next Review Date</b>	<b>December 2027</b>
<b>Version Number</b>	<b>5</b>
<b>Target Audience</b>	<b>All United Learning staff who may capture or process images of students. Parents and students</b>

## Contents

1	Introduction
2	How we use Your Data
3	Useful School Contacts
4	How we seek your consent for images used for promotion
5	How we use images for promotion
6	Capture of images by Parents/Carers
7	Capture of images by children
8	Use of Images of Children by the Media
9	Use of Professional Photographers
10	Use of Closed-Circuit Television (CCTV)
11	Annex 1 – Shoreham Academy form (parents)
12	Annex 2 – Shoreham Academy image consent form (Sixth Form)
13	Annex 3 Photographing Children: Frequently Asked Questions for Parents/Carers
14	Annex 4 Sample Group Activity Permission Letter and Form
15	Annex 5 Parental Consent for Images as part of Group Activity
16	Annex 6 Shoreham Academy Guide to the Use of Images Online

## Introduction

We take and store images for a number of purposes:

- For identification purposes

- To take images of students, individually or in groups, as part of the school's record and as a service for parents
- For security and monitoring via CCTV recordings
- For teaching and learning purposes
- For use in celebration and promotion of activities in school

For the purposes of identification, record, security and teaching and learning, our legal basis for processing is public task, because we need to process these images as part of running Shoreham Academy

Photographs taken in school as a service for parents (such as class photos) are processed on the basis of legitimate interest, because this is an activity that people might reasonably expect us to perform.

We will ask for consent to use images in promotional material.

## How we use Your Data

The data controller for personal information held by Shoreham Academy is United Learning Trust (ULT). ULT is registered with the Information Commissioner's Office (ICO). The registration number is Z7415170. The Company Secretary is responsible for ensuring that ULT complies with the Data Protection Law. They can be contacted on [company.secretary@unitedlearning.org](mailto:company.secretary@unitedlearning.org). or 01832 864538.

All images will be used in a manner respectful of the eight Data Protection Principles. This means that images will be:

- fairly and lawfully processed
- processed for limited, specifically stated purposes only
- used in a way that is adequate, relevant and not excessive
- accurate and up to date
- kept on file for no longer than is necessary
- processed in line with an individual's legal rights
- kept securely
- adequately protected if transferred to other countries.

Tim Harkins, Business Director is responsible for ensuring the acceptable, safe use and storage of all images within the school. This includes the management, implementation, monitoring and review of this policy.

## Useful School Contacts

SLT Lead: Tim Harkins, Business Director

School Data Controller: Matt Saunders, Assistant Principal, Director of Data, Assessment and Reporting, Data Protection Lead

School Designated Safeguarding Lead (DSL): Lydia Shelley, Vice Principal

Operational DSL Carolyn Gilding

Governor with lead responsibility: Kay Haffenden

## How we seek your consent for images used for promotion

- Written parental permission will be sought on entry to the school, except in the case of Sixth

Form students, who will be asked to sign their own consent forms. A record of all consent details will be kept securely on file.

- Should permission later be withdrawn by parents/carers, records will be updated, and the relevant staff informed, and no further images of the student concerned will be captured for use in publicity. *(Please note that images already in circulation cannot be withdrawn.)*
- We will always make individuals aware if photography is taking place and will talk about how and why we are taking the images in an age-appropriate way.
- We will always respect the individual and will never take images of anyone against their wishes.
- When taking images, careful consideration will be given before involving very young or vulnerable children who may be unable to question why or how activities are taking place.
- Photography is not permitted in sensitive areas such as changing rooms, toilets, etc.

There are always some risks associated with the distribution of images. These measures help to mitigate those risks, but you should make sure you are comfortable with your child being featured in images before you give consent.

## How we use images for promotion

Images are a way for us to celebrate achievement, keep parents and communities informed about our activities, and raise our profile. Parents and families and the children themselves often derive great pleasure from seeing their loved ones in print or on a website.

- Images may be included in print or digital media. Examples might include: printed publications; websites; adverts; in communications channels such as newsletters or social media; as part of wall displays; or to accompany stories in the media.
- Children's full names will not be associated with photographs except where directly relevant. For example: where the child has won a major competition.

## Capture of images by Parents/Carers

- Parents/Carers are permitted to take photographs or video footage of events for private use only.
- Parents/Carers must not share images of any other student on social media.
- The opportunity for parents/carers to take photographs and make videos can be reserved by the academy/setting on health and safety grounds.
- Parents/Carers are not permitted to take photographs in sensitive areas such as changing rooms, toilets, swimming areas etc.
- Parents/Carers who are using photographic equipment must be mindful of others when capturing images.
- 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 may contact the school's DSL to discuss any concerns regarding the use of images.

## Capture of images by children

- We will discuss and agree age-appropriate acceptable use rules with children regarding the use of cameras, such as places children must not capture images (e.g. unsupervised areas, toilets etc).
- 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 which are used for school purposes will be processed and stored in accordance with this policy.

## **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 will be sought from parents and carers by the academy and press which will request that a pre-agreed and accepted amount of personal information (e.g. first names only unless agreed by parents/carers for full name use for specific cases) can 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 Professional Photographers**

- Professional photographers who are engaged to record any events will be prepared to work according to the terms of the settings e-Safety and the Image Use policy.
- Photographers will sign an agreement which ensures compliance with the Data Protection Act 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.

## **Use of Closed-Circuit Television (CCTV)**

For information on how we capture and process images through CCTV, please refer to our CCTV policy.

### **Further information**

You can read more about how we capture, use, process, and store images in the following policies:

- Safeguarding and Child Protection Policy
- Privacy Notice
- Data retention schedule
- Staff code of conduct
- ESafety Policy
- Acceptable use of IT Policy

## Annex 1 – Shoreham Academy form (parents)

### Parental consent to use student photos and videos (images) for promotion

Images are a way for us to celebrate achievement, keep parents and communities informed about our activities, and raise our profile. Parents and families and the children themselves often derive great pleasure from seeing their loved ones in print or on a website.

- Images may be included in print or digital media. Examples might include: printed publications; websites; adverts; in communications channels such as newsletters or social media; as part of wall displays; or to accompany stories in the media.
- Children's full names will not be associated with photographs except where directly relevant. For example: where the child has won a major competition.
- Images will only be used for promotional purposes with the consent of parents / carers.

I [parent/carer name] grant permission for you to capture images of my child for use in publicity and communications by Shoreham Academy and United Learning. I confirm that I have read the privacy notice, and I understand that it may not always be possible to recall existing images of my child from circulation if I withdraw consent at a later date.

Student name \_\_\_\_\_

Parent/Carer name \_\_\_\_\_

Relationship to child \_\_\_\_\_

Signed \_\_\_\_\_

Date \_\_\_\_\_

**You have the right to withdraw your consent at any time. You can do so by contacting [info@shoreham-academy.org](mailto:info@shoreham-academy.org).** Should you withdraw your consent, no further images of the student concerned will be captured for use in publicity. Please note that images already in circulation cannot be withdrawn.

The data controller for personal information held by Shoreham Academy is United Learning Trust (ULT). ULT is registered with the Information Commissioner's Office (ICO). The registration number is Z7415170. The Company Secretary is responsible for ensuring that ULT complies with the Data Protection Law. They can be contacted on [company.secretary@unitedlearning.org.uk](mailto:company.secretary@unitedlearning.org.uk) or 01832 864538.

**Please note that Shoreham Academy and United Learning take images (including photographs and video) for a number of other purposes. These purposes and the lawful basis for processing those images are identified in our Image use policy.**

## Annex 2 – Shoreham Academy image consent form (Sixth Form)

### Sixth Form: consent to use student photos and videos (images) for promotion

Images are a way for us to celebrate achievement, keep parents and communities informed about our activities, and raise our profile. Parents, families and students often derive great pleasure from seeing their loved ones in print or on a website.

- Images may be included in print or digital media. Examples might include: printed publications; websites; adverts; in communications channels such as newsletters or social media; as part of wall displays; or to accompany stories in the media.
- Full names will not be associated with photographs except where directly relevant. For example: where the student has won a major competition.
- Images will only be used for promotional purposes with the consent of parents / carers, or of the individual student once they enter Sixth Form.

I [student name] grant permission for you to capture my image for use in publicity and communications by Shoreham Academy and United Learning. I confirm that I have read the privacy notice, and I understand that it may not always be possible to recall existing images of me from circulation if I withdraw consent at a later date.

Student name \_\_\_\_\_

Signed \_\_\_\_\_

Date \_\_\_\_\_

**You have the right to withdraw your consent at any time. You can do so by contacting [sixthform@shoreham-academy.org](mailto:sixthform@shoreham-academy.org).** Should you withdraw your consent, no further images of you will be captured for use in publicity. Please note that images already in circulation cannot be withdrawn.

The data controller for personal information held by Shoreham Academy is United Learning Trust (ULT). ULT is registered with the Information Commissioner's Office (ICO). The registration number is Z7415170. The Company Secretary is responsible for ensuring that ULT complies with the Data Protection Law. They can be contacted on [company.secretary@unitedlearning.org.uk](mailto:company.secretary@unitedlearning.org.uk) or 01832 864538.

**Please note that Shoreham Academy and United Learning take images (including photographs and video) for a number of other purposes. These purposes and the lawful basis for processing those images are identified in our Image use policy.**

## **Annex 3 Photographing Children: Frequently Asked Questions for Parents/Carers**

### **Why do we need a policy?**

Schools, playgroups, and youth groups have always used photographs as a way of celebrating achievement or seeking publicity for fundraising etc. Parents and families and the children themselves often derive great pleasure from 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 need to be aware that placing any identifying information in the public domain has risks. Parents need to understand these issues in order to give properly considered consent. It is important that parents and schools have the opportunity to 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 setting or youth group and the name of the child it could be quite easy to find out the child's address and even work out their likely route to academy/the 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 consent forms in the annex of this policy, to safeguard children and the wider community.

### **Isn't this just scaremongering?**

Sadly no. There have been cases 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 in order to make an informed decision.

### **What about the academy websites?**

The same concerns apply to academy-controlled sites and there is an added concern that images of children may be copied directly from a site which can then be manipulated or changed by another person. Academies can copy protect images and use lower quality images which means they cannot be usefully enlarged but this can be bypassed so must not be relied upon to keep images safe.

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

Taking pictures or recordings of your own children for your own personal use is ok. The difficulty arises with plays or other events in that other children may also be filmed. It is important that we are all aware that some members of the community (children or adults) 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 are 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 academy site without appropriate permission from the academy.

## Annex 4 Sample Group Activity Permission Letter and Form

Dear Parent/Carer

We are staging a production/special event of on xxxxxx. We are sure some parents/carers would like to take photographs/videos of the production. As you know we have a policy in place with regards to the taking, making and use of images and you will have previously signed a consent form stating whether or not your child could be photographed. In circumstances, such as productions or special events, we request specific consent before photographs can be taken by a third party. If you wish to take photos at the production, there is a strong possibility that other children will also be included within the picture. We therefore need to ensure all parents/carers who have children in the production are happy for photographs to be taken, and hence need to request their permission.

We all enjoy and treasure images of our family and friends; family events, holidays and events are moments we all like to capture in photos or on video. We now have the exciting dimension of adding our images and videos to our online social network, such as Facebook, YouTube, and many other websites. This means that we can easily share our photos and video with family and friends.

Whilst this can be very useful to all of us, we must ensure we protect and safeguard all children and staff, including those who do not want to have their images stored online.

- Once posted and shared online any image or video can be copied and will stay online forever.
- Some children are at risk and **MUST NOT** have their image put online. Not all members of the community will know who they are.
- Some people do not want their images online for personal or religious reasons.
- Some children and staff may have a complex family background which means that sharing their image online can have unforeseen consequences.
- Therefore, in order to keep all members of the community safe we must all **‘Think Before We Post’** Online

At Shoreham Academy we are happy for parents and carers to take photos and video of events for personal use, but we request that these images are not distributed or put online. This is to protect all members of the community.

Please be aware that parents are not permitted to take photographs or to make a video recording for anything other than their own personal use (e.g. with a view to selling videos of an event).

We would, therefore, be very grateful if you would complete the slip at the bottom of this letter and return it to me by (date).

Should any parent/carers not agree with their child being photographed, we will consider alternative options including:

- restricting who is involved in the production/special event
- staging specific photograph opportunities



Photographs of setting productions are ones which parent/carers tend to treasure. We will therefore only prohibit the use of cameras and videos as a last resort. We hope you will support us in this.

Yours sincerely

## **Annex 5 Parental Consent for Images as part of Group Activity**

Child's name:

Date:

I am / am not \* happy for photographs to be taken of the production/special  
event in which my child is due to appear on xxxxxx (date)

(\*Please delete as appropriate)

Signed:

Date:

## **Annex 6 Shoreham Academy Guide to the Use of Images Online**

### **Using Images Safely and Responsibly**

We all enjoy and treasure images of our family and friends; family events, holidays and events are moments we all like to capture in photos or on video.

We now have the exciting dimension of adding our images and videos to our online social networks, such as Facebook, YouTube and many other websites. This means that we can easily share our photos and video with family and friends.

Whilst this can be very useful to all of us, we must ensure we protect and safeguard all children and staff, including those who do not want to have their images stored online.

### **What should we all think about before posting any images or video online and are there any risks?**

- Once posted and shared online, any image or video can be copied and will stay online forever.
- Some children are at risk and **MUST NOT** have their image put online. Not all members of the community will know who they are.
- Some people do not want their images online for personal or religious reasons.
- Some children and staff may have a complex family background which means that sharing their image online can have unforeseen consequences.
- Therefore, in order to keep all members of the community safe we must all **‘Think Before We Post’** Online.

**At Shoreham Academy we are happy for parents and carers to take photos and video of events for personal use but request that these images are not distributed or put online. This is to protect all members of the community.**

We thank you for your support,

### **Further Information on the Use of Images and video:**

- Information Commissioner’s Office: <https://ico.org.uk/>
- Think U Know: [Parents and carers | CEOP Education \(thinkuknow.co.uk\)](https://www.thinkuknow.co.uk/)
- Get Safe Online: [www.getsafeonline.org](https://www.getsafeonline.org)

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

**We are happy for parents and carers to take photos and video for personal use but request that these images are not distributed or put online if they contain images of other children, adults or staff without consent. This will help protect all members of the community.**

**Thank you for your support**