



Gosfield School

Taking, Storing and Using Images of Children Policy Whole School, including EYFS

At Gosfield School we are an open and inclusive community that is very proud of all the achievements of all of our students in their academic, artistic and sporting endeavours. The School celebrates its diversity and gives all of its many visitors a warm welcome.

The School particularly welcomes parents to its concerts, plays and sporting events as well as to more formal occasions during the school year. The school walls are decorated with examples of students' work, team photographs and photographs of trips and expeditions in which our students have participated. The School's website is updated regularly.

From time to time, the School may be visited by the media who may take photographs or film footage at a school event. Students will often appear in these images which may then appear in local or national media (press and/or TV). The School will always notify parents in advance when it expects the press to attend an event in which its students are participating and will make every effort to ensure that children whose parents or carers have refused permission for images of their children to be used are not photographed by the press. The School will always complain to the Independent Press Standards Organisation (IPSO), where applicable, or the relevant publisher/regulator if the media fails to follow the appropriate code of practice for the protection of young people including the children of celebrities.

THE APPLICATION OF DATA PROTECTION LAWS TO TAKING, USING AND STORING IMAGES OF CHILDREN

Parents who accept a place for their child at Gosfield School are invited to agree to the School using photographs of their child and information relating to their achievements as per Appendix 1.

The School processes photographs and recordings in accordance with current UK data protection law, including the UK GDPR and Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025. The lawful basis for each use will depend on the purpose. Where the School relies on consent, consent must be freely given, specific and capable of being withdrawn; other uses may rely on a different lawful basis.

Students like to be photographed and to see their work displayed so we hope that parents will feel able to support the School by consenting to the School using images in the ways described within this policy.

USE OF IMAGES

Gosfield School will use photographic images of its students for the following purposes:

- Internal displays (including moving images) on digital and conventional noticeboards within the School premises
- Communications with the School community (parents, students, staff, Governors and alumni) via the School's website and other conventional means of communication
- Marketing the School using a variety of promotional materials

- Marketing the School digitally through the website, the School's prospectus, displays at educational fairs and other marketing functions (both inside the UK and overseas) .

IMAGES THAT THE SCHOOL USES IN DISPLAYS AND ON ITS WEBSITE

In using images for displays and communication purposes, the School makes every attempt not to identify an individual student by their full name. Instead, they name the event, the term and year that the photograph was taken (for example, 'First XV rugby team'). The School only uses images of school activities, such as plays, concerts, sporting fixtures, prize giving, school trips etc. in their proper context. The School will never use any image that might embarrass or humiliate a student. It will also only use images of students who are suitably dressed. Students are always properly supervised when professional photographers visit the School. Parents are given the opportunity to purchase copies of these photographs.

INTERNAL IDENTIFICATION

All students are photographed on entering the School and, thereafter, at yearly intervals, for the purposes of internal identification. These passport-sized photographs identify the student by:

- Name
- Year Group
- Tutor group
- House

They are securely stored on the , School's Student Information System, Bromcom, where access is password protected and restricted to academic, pastoral and school office staff. Any parent will be sent a copy of his or her son or daughter's photograph on request.

STORAGE AND REVIEW

Electronic photographs and recordings are stored only in approved School systems with access controls appropriate to the sensitivity and purpose of the material. Images and recordings are retained in accordance with the School's retention schedule and are securely deleted or archived when no longer required. Access, sharing and disposal must comply with the School's data protection, safeguarding and information security procedures.

The School endeavours to ensure that images of children will not be published in any new school material once they have left the School. However, the School's existing publications, website and archived material may contain these images.

The School has a procedure in place for regularly checking and updating its website, when expired material is deleted.

The very age of the School has resulted in a collection of historic photographic images that have been archived by the alumni association. These images are kept securely on school premises. The alumni association is overseen by the Principal.

USE OF CAMERAS AND RECORDING EQUIPMENT BY PARENTS AND GUARDIANS

Parents are welcome to take photographs of their own children taking part in sporting and outdoor events. When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and recording devices with consideration and courtesy for the comfort of others.

The School asks parents not to take photographs of other students on their own without the prior agreement of that child's parents.

Flash photography can disturb others in the audience or even cause distress for those with medical conditions; we therefore ask that it is not used at indoor events.

Parents are also reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts. The School gives written and/or verbal guidance re the taking of photos or recording of performance that may compromise copyright guidance or child protection. Parents and visitors must follow any instructions given by the School

Gosfield School may record plays and concerts professionally (not just those where copyright applies).

USE OF MOBILE TECHNOLOGY BY STUDENTS

Everyone has a right to feel secure and to be treated with respect, particularly the vulnerable. Harassment and bullying will not be tolerated. The School's Anti-Bullying Policy is available on the School's website. The School is strongly committed to promoting equal opportunities for all regardless of race, gender, gender orientation or physical disability.

All students are encouraged to look after each other and to report any concerns about the misuse of technology to a member of the pastoral staff. The use of mobile phones is not allowed during the school day, these must be switched off and placed in the student's bag for the duration of the day or in a lockable pouch. The misuse of mobile devices including iPads, Chromebooks, phones, wearable technology and other mobile devices in a way that breaches our Anti-Bullying policy is always taken seriously and may be the subject of disciplinary procedures.

Students may use mobile devices with the capability of recording and/or storing still or moving images only with the express permission of the member of staff in charge and with the permission of those appearing in the image.

We will not tolerate any illegal material and will always report illegal activity to the Police and/or the Local Child Safeguarding Board (LCSB) and Safeguarding partners. If we discover that a child or young person is at risk as a consequence of online activity, we may seek additional assistance from the Child Exploitation and Online Protection Unit (CEOP). We will impose a range of sanctions on any adult, child or young person who misuses technology in this way.

The School has robust monitoring and filtering systems in place which will:

- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- identify the device and the unauthorised online platform accessed, alerts are sent to the group pastoral monitoring email including the network manager. The incident is followed up immediately and procedures followed. Where the content raises more serious concerns the safeguarding procedures are followed and any further intervention with outside agencies is implemented.

Using photographic material of any kind to bully, harass or intimidate others will not be tolerated, the use of technology in cases of child-on-child abuse, sexual harassment will constitute a serious breach of discipline. Sharing indecent images or videos will be investigated and serious sanctions applied. The use of AI to create self-generated intimate images and/or videos e.g. deepfakes or live streams by young people under the age of 18 online is prohibited including sharing of such material and the School will report any evidence to the police, this is illegal and serious sanctions apply.

Staff investigating incidents where this is believed to have taken place must not view the image or material. They should confiscate the phone and report to the Principal or DSL, should evidence need

to be obtained. This is a matter for the Police, and the School will follow the advice given by Safeguarding partners or the Police.

If there is reason to believe that a student has used mobile technology for illegal activity or to bully, harass or intimidate others, students must allow staff to confiscate their mobile phone and/or camera pending further enquiries. Should the device need to be passed to the Police, parents will be informed. The School will follow the advice of Police or Local Safeguarding Children's Board (LSCB) and Safeguarding partners.

The posting or AirDropping of images, which in the reasonable opinion of the Principal is considered to be offensive, on any form of social media or websites such as: Instagram, Snapchat, WhatsApp and YouTube etc. is a serious breach of discipline and will be subject to disciplinary procedures whatever the source of the material, irrespective of whether the image was posted using school or personal facilities.

Gov.UK Guidance

Sharing nudes and semi-nudes: advice for education settings working with children and young people – Updated 11 March 2024

This March 2024 UK Council for Internet Safety guidance remains the current specific national advice as at August 2026 and should be read alongside Keeping Children Safe in Education 2026 (in force from 1 September 2026).

Sharing photos, videos and live streams online is part of daily life for many young people, enabling them to share their experiences, connect with friends and record their lives. Photos and videos can be shared via messaging apps or posted on social media and image sharing platforms. It is important to note that children and young people send a variety of images and videos, some of which are not nude, semi-nude and/or exploitative or intended to be so. Not all young people send nudes and semi-nudes but many are asked to send them or receive images and videos of others with or without consent. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship.

It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find self-generated intimate images and/or videos online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing self-generated intimate image and/or videos and generate a new intimate image .
- images created or shared are used to abuse or blackmail peers.

Situations could include:

- children and young people self-generated intimate images and/or videos including those generated using AI e.g. deepfakes or live streams
- children and young people coercing a peer into sharing an intimate image or video to blackmail them for money, further images, or force them into illegal activity
- children and young people hacking a peer's account to share images/ video's more widely without consent to publicly shame
- children and young people create and share a self-generated intimate images and/or video including deepfakes or live streams by young people under the age of 18 online with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

Producing, sharing, sending or posting self-generated intimate images and/or videos including those generated using AI e.g. deepfakes or live streams by young people under the age of 18 online is illegal,

the response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of any children and young people involved. All incidents should be dealt with proportionally to the behaviour being displayed. The DSL in consultation with the relevant authorities will act at all times in the best interest of the child, guidance from external agencies will guide the decision-making process to protect all concerned. The chart below can help staff to identify the motivation and context.

Deepfakes are digitally created or altered media, like videos, images, or audio recordings, that convincingly mimic real people. These fakes are made using artificial intelligence, specifically deep learning techniques, to generate or manipulate content. While they can be used for harmless purposes like entertainment, deepfakes are increasingly raising concerns about their potential for malicious use, including misinformation, impersonation, and even cybercrime. If a student has created harmful content the school will seek the advice of external agencies for guidance and refer to the Safeguarding Policy procedures. Sanctions will be appropriate, but it may be necessary to permanently exclude a child, the Principal will consider all facts and findings of an investigation before deciding and parents will be consulted and informed.

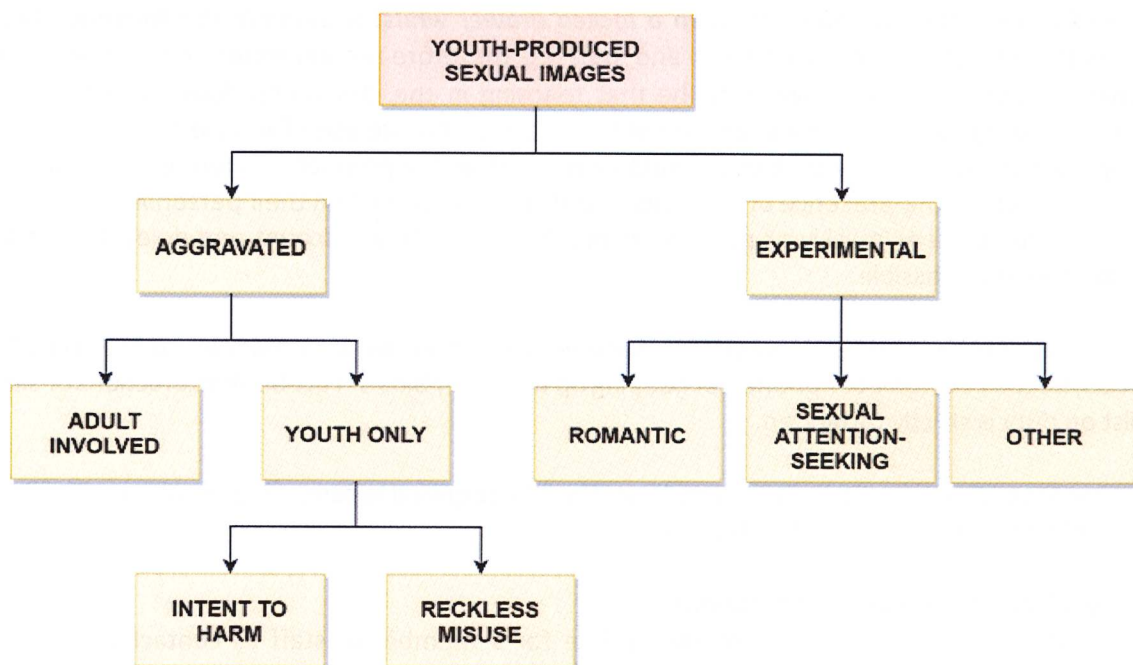


Fig 1: Sexting, a typology (Finkelhor and Wolak)

Legal Risks and Sanctions

- **Copyright Infringement:** Using protected training data or making an image that looks too much like a real person's protected work can bring a lawsuit.
- **Defamation:** Making a fake image that places a real person in a false or bad light can lead to claims for damages.
- **Data Protection (GDPR):** Using a real person's face without permission breaks privacy rules in many regions.
- **Platform Bans:** Breaking terms of service can get your accounts shut down.

USE OF MOBILE TECHNOLOGY BY STAFF

School-owned staff desktops and laptops may be monitored using Ativion EducationPro (Education Pro) on-premises for safeguarding, online-safety, security and acceptable-use purposes. Staff must use School systems and devices in accordance with the Staff ICT Acceptable Use Policy and should not expect activity on School-owned systems or devices to be private. Monitoring is carried out lawfully, transparently and proportionately, with access restricted to authorised staff.

We recognise that mobile phones and devices are very much part of everyday life but also that they can cause an unnecessary distraction during the working day and can be intrusive when used in the company of others.

Throughout this guidance the term 'mobile phone' is used but is intended to cover all mobile devices, including smartphones, Chromebooks, iPads wearable smart devices and any other such device with the facility to make/receive calls, capture images and/or share data.

Given the complex nature of the School, teaching and support staff (except those working in the Nursery) are permitted to keep phones on their person, and available for use. **Nursery staff are required to keep their mobile phones in a locked drawer whilst working in the Nursery.** Mobile phones should not interfere with work and staff are therefore not permitted to use their mobile phones/devices whilst on active duty, be that teaching in the classroom, during activities or on supervisory duty, unless for the execution of their duties. Private use of mobile phones may occur during staff breaks, but any such use should be discreet and appropriate; infrequent; out of lesson time; and never in the presence of students. If staff do take photos on their personal devices, these should be uploaded as quickly as possible to the School OneDrive account and deleted from their device as soon as possible.

We can never permit professional staff to behave in an unprofessional manner, so the use of any devices, be they PC, tablet or phone, for keeping up with eBay bids or Facebook interactions or similar whilst on duty is strictly forbidden.

On some occasions, school trips for example, staff will be required to carry a mobile phone. The School has mobile phones specifically for this use.

Sharing of mobile numbers with students

Under most circumstances, it is not appropriate for a member of staff to contact a student or parent/carer using their personal mobile phone. Staff with students in the School who have shared their number with parents should declare this to the Designated Safeguarding Lead. If a member of staff needs to make telephone contact with a student, a school telephone should be used. Staff cannot use personal devices to take photos/videos of children. Related to devices, staff must not follow or allow themselves to be followed by current students on social media.

The sending of inappropriate text or multimedia messages between any member of the School community is not allowed. This guidance is to safeguard both members of staff and the School. Any failure to comply with this guidance is likely to result in disciplinary action (or, in certain circumstances, a child protection allegation) and the appropriate disciplinary procedures will apply.

STAFF INDUCTION

All new teaching and office staff are given guidance on the School's policy on taking, storing and using images of children.

This statement, policy and arrangements are approved by the Governing Body.

Ratified by the Governing Council of Gosfield School

Signed K. Malanoff
Chair of Governors

Date: 14.9.26

Signed _____
Principal



Date 14/9/26

Date of next review: September 2027

APPENDIX 1

Consent to the Use of Images is now accessed online, here is an image of the template:

CONSENT FOR PHOTOGRAPHY AND USE OF IMAGES OR RECORDINGS OF CHILDREN

I have read the School's policy on taking, using and storing of images of children at <https://www.gowfordschool.org.uk/wp-content/uploads/2022/05/Taking-storing-and-using-images-of-children-policy-AUG-22-.pdf> and I/we agree that in respect of:

Student name: *

Date of Entry: *

The School has full permission to use our child's photograph/recording on:

☐ internally (within the School) and externally (in advertising to promote the School) on digital and/or physical displays; and/or in documentation that is sent electronically and/or

☐ in hard copy to the School community (prospective parents, current parents, pupils, staff, Governors and alumni) including in marketing material such as the School newsletter and social media content.

Please delete as appropriate: *

☐ Yes

☐ No

I understand that I may revoke my consent at any time by giving written notice to the School.

I agree to adhere to the School's guidelines for the private use of cameras and recording equipment.