



Photographic Images Policy

Policy statement

At Playhouse Pre-School, photographs and videos can be a valuable way of recording children's experiences, learning and development and of sharing appropriate information with parents and carers.

As Playhouse Pre-School cares for children from 9 months to 4 years, particular care is taken when photographing babies and young children. Images are only taken where there is a clear and appropriate purpose and are handled in accordance with safeguarding, data protection and confidentiality requirements.

Photographs and videos of identifiable children are personal data. Playhouse Pre-School will ensure that images are collected, used, stored, shared and deleted lawfully, fairly and securely.

This policy should be read alongside the:

- Safeguarding Children Policy
- Data Protection and Confidentiality Policy
- Online Safety Policy
- Staff Code of Conduct
- Mobile Phone and Electronic Devices procedures
- Record Keeping Policy
- Complaints Policy

The policy applies to photographs and videos taken on Playhouse Pre-School equipment and to the use of images by staff, children, parents, carers, visitors, students and external photographers.

Purposes for taking photographs and videos

Photographs and videos may be taken for appropriate purposes including:

- recording children's learning, development and experiences;
- contributing to children's individual records and learning journeys;
- sharing relevant learning and experiences with parents and carers through approved systems such as eyLog;
- displaying children's work and experiences within the setting;
- supporting assessment and professional reflection;
- documenting special events and activities;
- promoting Playhouse Pre-School through its website or approved social media accounts, where the appropriate permission and lawful basis is in place;
- providing information to parents about activities taking place at the setting;
- staff training and professional development, where appropriate safeguards and permissions are in place.

Photographs and videos will not be taken simply because a camera or device is available. The number of images taken will be kept to a reasonable minimum and images will be relevant to the purpose for which they are collected. Current government guidance recommends keeping images and videos of children to a minimum, including for assessment purposes.

Taking photographs and videos

Photographs and videos of children for Playhouse Pre-School purposes will normally only be taken by authorised members of staff using Playhouse Pre-School devices.

Staff must:

- use only authorised Playhouse Pre-School equipment for taking photographs and videos for setting purposes;
- follow the setting's safeguarding and data protection procedures;
- only take images for an appropriate and identified purpose;
- ensure children are appropriately dressed;
- avoid taking photographs in toilets, nappy-changing areas or other areas where children have an expectation of privacy;
- avoid images that could cause distress, embarrassment, humiliation or upset;
- never take inappropriate, intrusive or sexualised images of children;
- never deliberately photograph a child who has indicated that they do not wish to be photographed, where they are able to express such a preference;
- ensure images are transferred or uploaded only to approved, secure systems;
- delete images from the device when they are no longer required on that device and in accordance with the setting's retention arrangements;
- report any loss, accidental disclosure, inappropriate image or other data protection concern immediately to the Manager/appropriate person.

Staff must never use photographs or videos of children for their own personal purposes or post images of children on personal social media accounts.

The setting will not permit staff to use personal mobile phones or personal cameras to photograph or record children for Playhouse Pre-School purposes.

The EYFS requires settings to have safeguarding arrangements covering the use of mobile phones, cameras and other electronic devices with imaging and sharing capabilities.

Digital devices must not distract staff from supervising or interacting with children. Taking photographs should be a brief part of the activity and not interfere with children's care, safety or learning.

Consent, permissions and lawful use

Playhouse Pre-School will explain to parents and carers how photographs and videos may be used and will keep a record of any permissions or restrictions relating to individual children.

Where Playhouse Pre-School relies on consent for a particular use of an image, consent will be:

- specific;
- informed;
- freely given;
- clearly recorded; and
- capable of being withdrawn.

Parents and carers will be able to change or withdraw consent for uses that rely on consent. The setting will make it clear how they can do this.

Consent is not automatically the lawful basis for every photograph taken by the setting. The Manager will ensure that the appropriate lawful basis is considered for each type of processing in accordance with the setting's Data Protection and Confidentiality Policy.

For optional uses such as promotional photographs on the Playhouse Pre-School website or social media, parents/carers will be given clear information about the proposed use and the setting will maintain an up-to-date record of permissions or restrictions.

Recording parental preferences

When a child joins Playhouse Pre-School, the setting will record the parent's/carer's preferences regarding the use of photographs and videos.

The setting will ensure that staff who regularly work with children are aware of relevant restrictions.

Where a child has:

- no permission for particular uses;
- withdrawn permission;
- restrictions because of safeguarding circumstances; or
- specific arrangements agreed with the setting,

these restrictions will be clearly recorded and communicated to relevant staff.

A parent or carer's permission to take photographs for one purpose does not automatically mean that the images can be used for another purpose. For example, permission to use photographs for a child's learning record does not automatically mean that the same photographs can be used on the website or social media.

Where there is a safeguarding concern or legal reason for restricting the use or sharing of a child's image, the Manager/Designated Safeguarding Lead will ensure that safeguarding considerations take priority.

Photographs used on the website and social media

Where photographs are used on the Playhouse Pre-School website or official social media accounts:

- the image must have an appropriate purpose;
- the setting must have the appropriate permission/lawful basis for the use;
- staff must check the current photographic permissions before publishing;
- children should not normally be named;
- full names will not be published alongside photographs of children;
- photographs will not reveal unnecessary personal information about a child;
- photographs will be appropriate, respectful and suitable for public viewing;
- photographs will not show children in situations where they may be embarrassed or vulnerable;
- staff will consider whether the background of an image reveals information such as children's addresses, personal information, locations or other identifying details;
- images will be removed when they are no longer required or where permission for a consent-based use has been withdrawn, subject to any applicable legal requirements.

Particular care will be taken when considering images of children who have safeguarding concerns, are subject to court orders or have other circumstances where publication could place them at risk.

Storage and security of images

Photographs and videos taken for Playhouse Pre-School purposes will be stored securely.

The setting currently uses its own authorised iPads and approved computer systems. Devices and systems must be password protected and access must be restricted to authorised staff.

Images must not be:

- transferred to personal phones, tablets or computers;
- stored on personal cloud accounts;
- sent through personal email accounts;
- uploaded to personal social media;
- shared through unauthorised messaging applications;
- copied onto personal USB drives or other unauthorised storage.

Photographs and videos shared with parents should be shared through an approved and secure system, such as eyLog, rather than through personal messaging or social media accounts. Current DfE guidance specifically recommends that images and videos of children are shared with parents using technically secure methods.

The setting will have appropriate retention arrangements and will regularly review stored photographs and videos. Images that are no longer required will be securely deleted in accordance with the setting's retention schedule.

Use of photographs by parents and carers

Parents and carers may sometimes wish to take photographs or videos at special events, such as Christmas celebrations, performances or other activities.

The Manager will decide whether photography or filming by parents/carers is appropriate for each event and will communicate the arrangements in advance.

Where photography is permitted, parents and carers will be asked to:

- take photographs primarily of their own child;
- respect other children's privacy;
- avoid deliberately photographing children whose parents/carers have asked for them not to be photographed;
- not use photography or filming in toilets, changing areas or other private areas;
- not behave in a way that is intrusive, inappropriate or disruptive;
- avoid posting photographs of other people's children on public social media without appropriate permission.

The setting may restrict or prohibit photography at an event where there are safeguarding, privacy or practical reasons to do so.

Parents and carers should understand that photographs taken by them for genuinely personal or household use are treated differently under data protection law. However, Playhouse Pre-School can still set reasonable rules about photography at its events for safeguarding and privacy reasons.

Any person who does not follow the setting's arrangements may be asked to stop taking photographs or recording.

External photographers and visitors

If an external photographer, videographer or other organisation is invited to take photographs or videos at Playhouse Pre-School:

- the purpose of the photography will be explained to parents/carers in advance where appropriate;
- the setting will consider the appropriate lawful basis and permissions;
- relevant safeguarding and data protection arrangements will be established;
- the photographer will be appropriately supervised;
- the setting will establish what will happen to the images after the activity;
- images will only be shared or used for the agreed purpose;
- any external organisation processing children's personal data on behalf of Playhouse Pre-School will be subject to appropriate contractual and data protection arrangements where required.

The Manager is responsible for ensuring that appropriate checks and arrangements are in place before an external photographer is permitted to photograph children.

Staff, students and volunteers

Staff, students and volunteers must follow this policy whenever they are in the setting or taking part in Playhouse Pre-School activities.

They must not:

- use personal devices to photograph or record children for setting purposes;

- retain copies of children's photographs for personal use;
- upload children's images to personal social media;
- share children's photographs with anyone who is not authorised to receive them;
- take photographs in private care areas;
- use images of children in training materials without appropriate authorisation and safeguards.

Where photographs are required for a student's or staff member's training portfolio, the Manager will agree in advance how photographs will be taken, stored and used.

Where possible, anonymised images or images where children cannot be identified should be used for training purposes. Where identifiable images are necessary, the setting will ensure that the use is appropriate, lawful, necessary and covered by the relevant permission or other lawful basis.

Training photographs must never include children in intimate care situations or other private circumstances.

Children taking photographs

Children may occasionally use cameras or other technology as part of an appropriate learning activity.

Where this happens, staff will:

- supervise the activity appropriately;
- teach children to use devices safely and respectfully;
- ensure that children do not take photographs in private areas;
- ensure that images are used only for the intended educational purpose;
- remove or delete inappropriate or unnecessary images;
- consider the privacy and wishes of other children.

Younger children, including children in the Caterpillar Room, will only use photographic technology where it is developmentally appropriate and appropriately supervised.

Safeguarding concerns

Any concern about the inappropriate taking, use, storage or sharing of an image must be reported immediately to the Manager or Designated Safeguarding Lead.

This includes concerns about:

- inappropriate or intrusive photography;
- images being taken without appropriate authorisation;
- images being shared with unauthorised people;
- images being stored on personal devices;
- a member of staff or visitor behaving inappropriately when taking photographs;
- images that may place a child at risk;
- photographs or videos being lost or disclosed accidentally.

Where a concern relates to a member of staff, volunteer, visitor or other adult, the setting's safeguarding and allegations procedures will be followed.

Staff must not investigate concerns themselves or attempt to view, copy or circulate potentially concerning material unnecessarily. The DSL/Manager will decide what action is required.

Data breaches

A lost device, accidentally shared photograph, unauthorised access to photographs or other incident involving children's images must be reported immediately to the Manager.

The Manager will follow the setting's Data Protection and Confidentiality Policy and determine whether further action or reporting is required.

Where a personal data breach occurs, the setting will assess the risk and take appropriate steps to contain, investigate and address the breach.

Review of photographic images

The Manager will regularly review photographs and videos held by the setting to ensure that:

- they are still required;
- they are stored securely;
- they are being used for an appropriate purpose;
- unnecessary duplicate copies are removed;
- permissions and restrictions remain accurately recorded;
- staff continue to follow the policy.

Images that are no longer required will be securely deleted in accordance with the setting's retention arrangements.

Responsibilities

The Manager

The Manager is responsible for:

- ensuring this policy is implemented;
- ensuring staff understand the requirements;
- maintaining photographic permissions and restrictions;
- ensuring devices and systems are appropriately secured;
- overseeing the use of photographs on the website and social media;
- responding to data protection or safeguarding concerns;
- ensuring appropriate arrangements are in place for external photographers;
- reviewing the policy regularly.

All staff

All staff are responsible for:

- following this policy;
- using only authorised devices for setting photography;
- protecting children's privacy;
- checking photographic restrictions before taking or using images;
- keeping images secure;
- reporting concerns or breaches immediately;
- ensuring photography does not interfere with children's care, supervision or interaction.

This policy was agreed by the staff of Playhouse Pre-School Broadwater.

Adopted on 26th March 2015 and will be reviewed annually.

Reviewed on 30th September 2026 by Z. Munford