



Image Use Policy

Policy Date: 01/09/2026

Review Date: 01/09/2027

This policy sets out how Ringle Rainbow Nursery takes, stores, uses, shares and disposes of photographs and video safely and lawfully. It applies to staff, volunteers, students, contractors, visitors, children and parents/carers. It should be read alongside the Safeguarding and Child Protection Policy, Mobile Phones/Cameras and Electronic Devices Policy, Online Safety and Acceptable Use arrangements, Data Protection and Confidentiality Policy and Social Media Policy.

This policy reflects the EYFS statutory framework for group and school-based providers effective 1 September 2026, UK GDPR and the Data Protection Act 2018 as amended, including the Data (Use and Access) Act 2025, Working Together to Safeguard Children 2026, and KCSIE 2026 as supplementary safeguarding guidance.

Principles and Responsibilities

Images and videos in which a child can be identified are personal data. They will only be created and used for clear, legitimate nursery purposes and will be limited to what is necessary. The nursery will provide appropriate privacy information and identify a lawful basis for each use.

Penny Reidy is the Data Protection Lead. The Designated Safeguarding Lead (DSL) is Jack Nash and Deputy DSLs are Charlotte Baldock and Penny Reidy. Nursery leadership is responsible for ensuring that imaging devices and images are used safely, securely and consistently with safeguarding and data-protection requirements.

Children's welfare and best interests will be the primary consideration. Images must never be taken or used in a way that could embarrass, exploit, sexualise, identify a child's private circumstances, reveal safeguarding information or otherwise place a child at risk.

Permission, Lawful Basis and Children's Wishes

Ringle Rainbow Nursery will be transparent with parents/carers about the purposes for which images are taken and used. The nursery will record parental permissions/preferences for uses such as learning records, parent communications, displays, publicity, the nursery website and social media.

Permission is not automatically the same as UK GDPR consent. The nursery will identify the appropriate lawful basis for processing. Where consent is relied upon, it must be freely given, specific, informed and unambiguous and can be withdrawn.

Where a parent/carer withdraws permission or consent, records will be updated promptly and future use will stop. The nursery will take reasonable steps to remove images from



nursery-controlled digital channels where appropriate, but withdrawal may not make it possible or necessary to recover material already lawfully printed, distributed or published.

Children's views will be respected in an age-appropriate way. A child who indicates that they do not wish to be photographed or recorded will not be forced to participate, even where parental permission exists.

Taking Images and Videos Safely

- Only nursery-approved devices and systems may be used by staff to take or store images of children for nursery purposes.
- Staff, volunteers and visitors must not use personal mobile phones, smart watches, personal cameras or other personal devices to photograph or record children.
- The number of images and videos taken will be kept proportionate and to the minimum reasonably necessary for the intended purpose, including assessment and learning records.
- Images will be purposeful, appropriate and professional. Children must be suitably dressed and photography will not take place during intimate care, toileting, changing or in other circumstances where dignity or privacy could be compromised.
- Staff must remain focused on supervision and interaction with children; taking or uploading images must not distract from safe staffing, teaching or care.
- Images must be available for appropriate managerial/safeguarding scrutiny and staff must be able to explain the legitimate nursery purpose for images they create.

Storage, BabysDays and Secure Sharing

Images used for children's learning and nursery records may be stored and shared through BabysDays or other nursery-approved secure systems. Access will be restricted to authorised users and images will only be shared with parents/carers through technically secure methods approved by the nursery.

Images must not be copied to personal devices, personal email accounts, unauthorised cloud storage, messaging services or unapproved applications. Portable storage containing children's images should be avoided; where exceptionally authorised, appropriate encryption and logging controls must be used.

Third-party apps, websites, photographers or service providers that process children's images on the nursery's behalf will be appropriately assessed for privacy, security, safeguarding, retention and contractual/data-processing arrangements before use.

Images and videos will not be retained for longer than necessary for the purpose for which they were created and will be securely deleted or destroyed in line with the nursery's retention arrangements.

Publication, Website and Social Media



Only images approved for the relevant publication purpose will be used on the nursery website, social media, newsletters, advertising or other public material. Parents/carers will be informed about intended publicity uses and the nursery will honour recorded permissions/preferences.

A child's full name will not normally be published alongside their image on public nursery channels. Personal details such as home address, personal contact information, medical information, safeguarding status or other sensitive information will never be published with an image.

Before publishing an image, staff will consider the background and context to avoid revealing identifying information, locations, name labels, documents, screens or information about other children.

Once an image is placed on a public website or social media service, the nursery cannot completely control copying or redistribution. This will be considered when selecting images and explaining publicity arrangements to families.

Parents, Carers and Visitors

Ringle Rainbow Nursery prohibits parents/carers and visitors from using mobile phones to take photographs or videos inside the nursery. Parents/carers are not permitted to photograph or record nursery events unless the Nursery Manager has expressly authorised a specific arrangement.

This restriction is a nursery safeguarding measure. Personal or household photography may fall outside data-protection law, but the nursery may restrict photography to protect children whose images must not be shared or whose circumstances require additional safeguarding.

Images or videos supplied by the nursery for a family's private use must not be publicly shared where they contain another child or could compromise another child's privacy or safety. Concerns about images should be raised with the Nursery Manager, Data Protection Lead or DSL.

Use of Cameras by Children

Where nursery-owned cameras or digital devices are used by children as part of supervised learning, staff will establish simple, age-appropriate rules. Children will be encouraged to ask before taking another person's photograph and devices will not be used in toilets, intimate-care areas or unsupervised spaces.

Children will be directly and appropriately supervised when using imaging devices. Staff will review images before they are displayed, shared or published and will apply the permissions/preferences recorded for every identifiable child.

Nursery-owned devices and images created by children will remain under nursery control and will not be removed from the setting or transferred to personal devices.



CCTV and Webcams

If CCTV is used, the nursery will have a clear purpose and lawful basis, appropriate signage/privacy information, proportionate camera positioning, restricted access, secure storage and defined retention arrangements. CCTV will not be positioned in toilets or intimate-care areas.

CCTV footage that raises a safeguarding or criminal concern will be preserved and shared with appropriate agencies where necessary and lawful.

Webcams or live/video-streaming technology will only be used following specific safeguarding and data-protection assessment, clear authorisation, appropriate privacy information and secure technical controls. Any recording will be retained only for its stated purpose.

Media and Professional Photographers

Professional photographers and media representatives will only attend by prior arrangement. Their identity and purpose will be verified and they will not have unsupervised access to children.

Parents/carers will be informed in advance where a professional photographer or media organisation is expected to photograph children and the nursery will follow recorded permissions/preferences. Any provider processing images on behalf of the nursery must have appropriate data-protection and security arrangements.

Where a media organisation acts independently as a separate data controller, the nursery will make families aware of the proposed activity and will consider safeguarding risks before allowing access.

Artificial Intelligence, Editing and Emerging Technology

Children's images must not be uploaded to generative AI, facial-recognition, image-editing or other external AI services unless the service has been specifically approved by the Data Protection Lead and Nursery Manager following appropriate safeguarding, privacy and security assessment.

AI must not be used to create misleading, manipulated or synthetic images of nursery children. Any approved automated image processing must remain necessary, proportionate and subject to human oversight.

Safeguarding Concerns and Misuse

Any inappropriate, unexplained or unauthorised image of a child, suspected misuse of imaging technology, accidental sharing, loss of an image, or concern about a staff member's use of a camera/device must be reported immediately to the Nursery Manager and DSL.

Safeguarding, allegations/low-level concerns, whistleblowing and data-breach procedures will be followed as appropriate. Images that may constitute evidence of abuse or a criminal



offence must not be deleted, forwarded unnecessarily or investigated informally; the DSL will seek appropriate agency advice.

A personal-data breach involving images will be managed under the nursery's Data Protection and Confidentiality Policy, including consideration of whether notification to the ICO and affected individuals is required.

Monitoring and Review

Staff will receive information and training on safe image use, confidentiality, online safety and relevant device restrictions through induction and ongoing safeguarding updates. The Nursery Manager, DSL and Data Protection Lead will monitor compliance and review arrangements when technology, legislation, statutory guidance or nursery practice changes.

Reviewed and updated: 01/09/2026 by P Reidy

Review Date: 01/09/2027