



Use of Images Policy



The Stour Federation

1. PURPOSE AND SAFEGUARDING PRINCIPLES

The Stour Federation prioritises safeguarding and promoting the welfare of children as a child-centred responsibility for all staff. Protecting student imagery is essential to mitigate emerging risks, including AI-generated child sexual abuse material (CSAM), deepfakes, and vulnerability to blackmail. This policy ensures compliance with Keeping Children Safe in Education (KCSIE) and data protection laws.

2. RESTRICTIONS FOR EXTERNAL COMMUNICATIONS?

To minimise the risk of identities being targeted for grooming or image manipulation, the following rules apply to the school website, newsletters, and social media:

No Individual Photographs: Pupils must not be photographed individually for any external publication.

Group Requirement: All published photographs must contain groups of children.

Alternative Angles: Staff should prioritise group shots or alternative angles that minimise identifiable features, such as shots taken from behind or the side.

Anonymity: Children must not be named in captions; an easy rule is that if a pupil is named in a success story, their photograph must not be used.

Suitable Dress: Images will only depict children in suitable dress (e.g., no swimwear) to reduce the risk of inappropriate use.

3. CONSENT AND RECORD KEEPING

Written Consent: The school will obtain written parental consent annually for communication and marketing. This takes place using the Arbor Parent Portal.

Withdrawal: Parents and pupils have the right to withdraw consent at any time, after which the image must be removed from digital platforms immediately.

4. STAFF CONDUCT AND EQUIPMENT

Authorised Equipment Only: Staff and volunteers must only use school-owned devices to capture images; the use of personal mobile phones or tablets is strictly prohibited.

Secure Storage: Digital images must be transferred to a secure, encrypted school server (Google Drive) as soon as possible and deleted from the capturing device.

Low-Level Concerns: Unauthorised photography by staff on personal devices will be handled under the school's low-level concerns policy - yellow form.

5. REPORTING AND RESPONSE TO IMAGE ABUSE

Immediate Escalation: Any suspicion of image misuse, AI manipulation, or online harassment must be reported immediately to the Designated Safeguarding Lead (DSL).

External Reporting: The Stour Federation will report criminal threats or blackmail involving imagery to the police.

Support: The schools in The Stour Federation will prioritise the safety and emotional wellbeing of any child affected by image-based abuse.