

Use of Photographic and Video Images of Children Policy

June 2023

Approved by the Governing Body Strategy Group 29/06/23

This Policy is due for renewal in Term 6
2024-25

USE OF PHOTOGRAPHIC AND VIDEO IMAGES OF CHILDREN POLICY

OF

GODINTON PRIMARY SCHOOL

NB. The word parent throughout this policy refers to parents and carers.

School/Setting Designated Safeguarding Lead (DSL): Jill Talbot (Headteacher)

Governor with lead responsibility for Safeguarding: Charlotte Wright

SECTION ONE - OFFICIAL USE OF PHOTOGRAPHIC AND VIDEO IMAGES OF CHILDREN

A. SCOPE AND AIMS OF THE POLICY

This policy seeks to ensure that images and videos taken within and by Godinton Primary School are taken and held legally and the required thought is given to safeguarding all members of the community.

This policy applies to all staff, the governing body, external contractors, visitors, volunteers and other individuals who work for or provide services on behalf of the school (collectively referred to as 'staff' in this policy) as well as children and parents/carers.

This policy must be read in conjunction with other relevant school policies including, but not limited to; Safeguarding and Child Protection, Anti-Bullying, Behaviour and Discipline, GDPR, Online Safety, Acceptable Use Policies, Confidentiality, relevant curriculum policies including Computing, Personal Social and Health Education (PSHE) and Relationships and Sex and Relationships Education (RSE).

This policy applies to all images, including still and video content taken by Godinton Primary School.

All images taken by Godinton Primary School will be used in a manner respectful of the Data Protection Principles. This means that images will be processed:

- fairly,
- lawfully and in a transparent manner
- · for specified, explicit and legitimate purposes
- in a way that is adequate, relevant limited to what is necessary
- · to ensure it is accurate and up to date
- · for no longer than is necessary
- in a manner that ensures appropriate security

The Data Protection Officer (DPO) within the school (Lisa Crowfoot) supported by the

DSL and management team are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the setting. This includes the management, implementation, monitoring and review of the Use of Photographic and Video Images Policy.

B. PARENTAL CONSENT

Written permission from parents or carers will always be obtained before images and/or videos of children are taken, used or published by the school.

The school will take photographs and video images of pupils as part of its core educational function. This includes images taken for the purposes of:

- · Assessment evidence and records, especially in the Foundation Stage
- For classroom / school wall displays / digital photo displays e.g. photos on the monitor in the school entrance foyer
- Celebration displays
- Official school photographs
- As a record of pupil's work in their school books or class portfolios
- As a visual record of school events, e.g. sports day, school plays etc.

Details of the consent required is outlined in the parental consent form Appendix A. This includes the taking of photos and videos that may be uploaded to the school website.

Occasionally our school will be involved in ICT projects with other schools or educational organisations. As part of these projects, photographs and videos might be taken and uploaded to educational websites. Parental permission will again be sought for this. These are the only types of websites which staff, with permission are able to upload images taken of our children onto.

Written parental consent will always be sought to take and use photographs offsite for professional, marketing and training purposes. This is in addition to parental permission sought for onsite images. Occasionally there will be times when photographs of children are uploaded to third party websites for printing purposes (e.g. school prospectus). In these rare instances, parents should be aware that the terms and conditions of the third party might mean that the school no longer owns the photograph and it could be used externally by the company for promotional purposes without the school's knowledge or consent.

Written consent from parents will be kept by the setting where children's images are used for publicity purposes, such as brochures or publications, until the image is no longer in use.

Parental permission will be sought on admission to the school or when the requirements for permission change

A record of all consent details will be kept securely on file. Parents may amend their consent at any time and must do so in writing. Should permission be changed by parents/carers, then all relevant images will be removed and disposed of and the record will be updated accordingly.

C. SAFETY OF PHOTOGRAPHIC AND VIDEO IMAGES

All images taken and processed by or on behalf of the school will take place using school provided equipment and devices.

Staff will receive information regarding the safe and appropriate use of images as part of their data protection and safeguarding training.

All members of staff, including volunteers, will ensure that all images are available for scrutiny and will be able to justify any images in their possession.

Images will not be kept for longer than is to be considered necessary. A designated member of staff (DSL) will ensure that all photographs are permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use.

The DPO and/or DSL reserve the right to view any images taken and can withdraw or modify a member of staffs' authorisation to take or make images at any time.

Only official setting owned equipment and cameras will be used by staff to capture images of children for official purposes. Use of personal equipment and cameras by staff is prohibited.

Any apps, websites or third-party companies used to share, host or access children's images will be risk assessed prior to use.

The school will ensure that images always are held in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act, and suitable child protection requirements, if necessary, are in place.

Photographs will be disposed of should they no longer be required. They will be deleted and wiped or shredded as appropriate. Copies will not to be taken of any images without relevant authority and consent from the DPO and/or DSL and the parent/carer.

D. PUBLICATION AND SHARING OF IMAGES AND VIDEOS

Images or videos that include children will be selected carefully for use, for example only using images of children who are suitably dressed.

Children's' full names will not be used on the website or other publication, for example newsletters, social media channels, in association with photographs or videos.

The school will not include any personal addresses, emails, telephone numbers, fax numbers on video, on the website, in a prospectus or in other printed publications.

E. USAGE OF APPS/SYSTEMS TO SHARE IMAGES WITH PARENTS

At the time of this policy review, the school is considering the use of 'Tapestry' to upload and share images of children with parents.

The use of the system is being appropriately risk assessed and the Headteacher is taking steps to ensure all data stored is held in accordance with GDPR and the Data Protection Act.

Images uploaded to Tapestry will only be taken on school/setting devices.

All users of Tapestry are advised on safety measures to protect all members of the community e.g. using strong passwords, logging out of systems after use etc.

Parents/carers will be informed of the expectations regarding safe and appropriate use (e.g. not sharing passwords or copying and sharing images) prior to being given access. Failure to comply with this may result in access being removed.

F. SAFE PRACTICE WHEN TAKING PHOTOGRAPHIC AND VIDEO IMAGES

Careful consideration is given before involving very young or vulnerable children when taking photos or recordings, who may be unable to question why or how activities are taking place. Godinton Primary School will discuss the use of images with children and young people in an age appropriate way.

A child or young person's right not to be photographed is to be respected. Images will not be taken of any child or young person against their wishes.

Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.

Where possible the school will use general shots of classrooms or group activities rather than close up pictures of individual children. Consideration is given to camera angle.

Godinton Primary School will avoid providing the full name of pupils to accompany photographs or videos. We follow the DFE guidance that 'If the pupil is named, avoid using their photograph. If the photograph is used, avoid naming the pupil'.

Where names are required, the minimum information should be given i.e. just a first name. This would include in classroom and school displays. However medical alert posters may use full names.

G. USE OF CLOSED-CIRCUIT TELEVISION (CCTV)

All areas which are covered by CCTV will be well signposted, and notifications are displayed so that individuals are advised before entering such vicinity.

Recordings will be retained for a limited time only and for no longer than their intended purpose; this will be a for a maximum of 30 days. All recordings are to be erased before disposal.

Regular auditing of any stored images will be undertaken by the DSL or other member of staff as designated by the management team.

If cameras record activities taking place on the premises which are of a criminal nature or give any cause for concern, then information will be referred to the appropriate agency.

CCTV cameras will be appropriately placed within the setting.

H. USE OF WEBCAMS

Parental consent will be obtained before webcams will be used within the school environment for educational purposes.

All areas which are covered by webcams for security or safeguarding purposes will be well signposted, and notifications are displayed so that individuals are advised before entering such vicinity.

Recordings will be retained for a limited time only and for no longer than their intended purpose; this will be a for a maximum of 30 days (amend if different). All recordings are to be erased before disposal.

SECTION TWO - USE OF PHOTOS AND VIDEOS OF CHILDREN BY OTHERS

A. USE OF PHOTOS AND VIDEOS BY PARENTS AND CARERS

Parents/carers are permitted to take photographs or video footage of events for private use only.

Parents/carers who are using photographic equipment must be mindful of others, including health and safety concerns, when making and taking images.

The opportunity for parents/carers to take photographs and make videos can be reserved by the school/setting on health and safety grounds.

Parents/carers are only permitted to take or make recording within designated areas of the school/setting. Photography is not permitted in sensitive areas such as changing room, toilets, swimming areas etc.

The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time.

Parents may contact the school DSL to discuss any concerns regarding the use of images.

Photos and videos taken by the school and shared with parents should not be shared elsewhere, for example posted onto social networking sites. To do so may breach intellectual property rights, data protection legislation and importantly may place members of the community at risk of harm.

B. USE OF PHOTOGRAPHIC AND VIDEO IMAGES BY CHILDREN

The school will discuss and agree age appropriate acceptable use rules with children regarding the appropriate use of cameras, such as places children cannot take the camera, for example unsupervised areas, toilets etc.

The use of personal devices e.g. mobile phones, tablets, children's own digital cameras, is covered within the school/settings mobile phone and/or online safety policy. There will be occasions when children will be able to use cameras e.g. on some school trips.

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.

Photos taken by children for official use will only be taken with parental consent and will be processed in accordance with GDPR and the Data Protection Act.

Parents/carers will be made aware that children will be taking photos/videos of other children and will be informed how these images will be managed. For example, they will be for internal use by the setting only and will not be shared online or via any website or social media tool.

Photos taken by children for official use will be carefully controlled by the school/setting and will be checked carefully before sharing online or via digital screens.

Still and video cameras provided for use by children and the images themselves will not be removed from the setting.

C. USE OF PHOTOGRAPHIC AND VIDEO IMAGES 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.

Parents will be asked to give their consent for images to be taken by the press and that

only first names will be published. On occasions additional permission may be sought if it is deemed to be beneficial.

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.

D. USE OF EXTERNAL PHOTOGRAPHERS (THIRD PARTY) (THIS MAY INCLUDE VOLUNTEERS, STUDENTS ON TEACHING PRACTICE AS WELL AS OFFICIAL SCHOOL PHOTOGRAPHERS)

Official School Photographers (class / group and individual school photos)

External photographers who are engaged to record any events will be prepared to work according to the terms of the settings online safety policy.

Photographers will sign an agreement which ensures compliance with GDPR and the Data Protection Act.

Images taken by external photographers will only be used for a specific purpose, subject to parental consent.

Photographers will not have unsupervised access to children and young people. Suitable safeguarding checks will take place.

Copyright does not apply to images for private family use. However, copyright does exist in commercial photographs and it rests with the photographer. Copyright is a right that the photographer automatically enjoys as the creator of the work to prevent other people exploiting his or her work and to control how other people use it.

If the school commissions photographs to be taken by a third party for use by the school, it will be included in the contract that the school will own copyright for items taken on the school's behalf.

Photographs and Images taken by other third parties

Third Parties will be under the same obligations as our school to obtain parental consent to the use and distribution of photographs. This is covered by the school's consent form.

SECTION THREE - STAFF CONSENT

The school will seek the consent of staff and governors before taking photographs or videos of them. A consent form is completed. See Appendix B.

SECTION FOUR - EQUAL OPORTUNITIES

At Godinton Primary School, we are committed to ensuring equality of opportunity for all members of our school community irrespective of race, religion or belief, gender, gender reassignment, disability, sexual orientation, age, pregnancy or maternity, marriage and civil partnership or socio-economic background. We are determined to develop a culture of inclusion and diversity in which all those connected to the school feel proud of their identity and ability to participate fully in school life.

We tackle discrimination through the positive promotion of equality by challenging stereotypes and by creating an environment that champions respect for all. At Godinton Primary School, we believe that diversity is a strength that should be respected and celebrated by all those who learn, teach and visit us.

All school policies have an explicit aim of promoting equality and will be reviewed in terms of their contribution and effectiveness in achieving this aim.

SECTION FIVE - CHILDREN IN CARE

As for all our pupils, Godinton Primary School is committed to helping every Child in Care (CIC) to achieve the highest standards they can. To this end staff will ensure that in delivering the curriculum they set suitable learning challenges of CIC, respond to the diverse learning needs of CIC, and help to overcome the potential barriers to learning and assessment for CIC. The Assistant Head for Inclusion will support staff in doing this. The safety of Children in Care may be compromised if this policy is not adhered to.

SECTION SIX - MONITORING AND REVIEW

This policy is monitored by the Headteacher and is reviewed by the school community every 2 years or sooner if regulations change.



Using Photographic and Video Images of Children

Parental / Carer Consent Form

Name of Child	Date of Birth
Class	

This form is valid for the period of time your child attends Godinton Primary School. The consent will automatically expire after this time. We will not re-use any additional photographs or recordings after your child leaves Godinton Primary School without additional consent.

We will not use the personal information or full names (first and surname) of any child in a photographic image or video on our website, online, in our prospectus or in any of our other printed publications. If we use photographs of individual children, we will not use the full name of that child in the accompanying text or photo caption. If we name a child in any text, we will not use a photograph of that child to accompany any article.

This consent can be changed or withdrawn by the parent / carer at any time by informing Godinton Primary School in writing or completing an updated consent for which will supersede the original.

Please refer to the school's policy, Use of Photographic and Video Images of Children for further information.

PLEASE RETURN THE COMPLETED FORM TO THE SCHOOL AS SOON AS POSSIBLE.

Essential Core Function	Please circle
This consent enables us to take images of your child for internal use only	as appropriate
to fulfil core educational function. We would encourage parents to give	
permission for these purposes.	
May we use your child's image in the school? (E.g. on wall displays, photos stuck in their schoolbooks, celebration displays, name labels, assessments and medical alert posters. This is for educational use only. Images will remain internal).	YES / NO
May we record your child's image or use videos for assessments, monitoring or other educational use? These images will be used internally only. This includes the use of tracking apps, essential in Foundation Stage (Reception classes) in which images may be shared with a child's parents.	YES / NO
May your child's image be shared with other pupils? (E.g. Photo stuck into another child's book to record a group task, a class photo taken to record a special event and sent home to all in the class).	YES / NO

PLEASE TURN OVER

Additional Consent	Please circle as appropriate
May we use your child's image in our prospectus and other printed or digital publications that we produce for educational and promotional purposes, including the school newsletter?	YES / NO
May we use your child's image on our official school website? (This includes documents that might be uploaded to the website e.g. school newsletter).	YES / NO
May we use your child's image on other educational websites as a result of activities in which the school may be involved?	YES / NO
Do you consent for your child to be involved in webcam activities which are strictly controlled by the school for educational purpose only and which may be uploaded to educational websites?	YES / NO
May your child's photograph (individual) be taken by the school's official photographer?	YES / NO
May your child's photograph (class or group) be taken by the school's official photographer?	YES / NO
May your child's image (photographic or video) be taken by a third party approved by the school or shared with another educational establishment? E.g. trainee teacher completing a portfolio of evidence or image shared with another school as part of a local project.	YES / NO
Are you happy for your child to appear in the media e.g. if a newspaper or television film crew attend an event organised by the school?	YES / NO

I have read and understood the conditions of use accompanying this form. I am also aware of the following:

- · Websites can be viewed worldwide, not just in the United Kingdom where UK law applies.
- The press are exempt from GDPR and Data protection Act and may want to include the names and personal details of children and adults in the media.
- · As the child's parents / carers, we agree that if we take photos or video recordings of our child that include other children, then we will only use these for personal use and these will not be uploaded to websites or social media sites.

Parent / Car	er Name :	
Parent / Car	er Signature:	Date:

Use of Photographic and Video Images of Children Information for Parents / Carers Conditions of Use

This letter explains why we need to ask you for your consent to certain photographs and videos of your child being taken whilst at Godinton Primary School. When you have read the letter, you should fill in and return the form attached to let us know your wishes.

Generally, photographs for school and family use, and those that appear in the press are a source of pleasure and pride. We believe they can enhance self-esteem for children and young people as well as their families and so are to be welcomed.

We may take photographs for a number of reasons whilst your child is at Godinton Primary School, including:

- Documenting and recording educational activities
- · Recording their learning and development progress
- · Recording and celebrating special events and achievements

This is known as our core educational function.

Taking photographs for purposes that fall outside the scope of 'core educational function' also require parental consent. Consent is sought when the pupil starts at the school and lasts for the duration of their time at Godinton.

We will also encourage children to be active learners and to become involved in using cameras themselves by taking photos of their surroundings, activities and each other.

We do however recognise that with the increase use of technologies, particularly digitally and online, the potential for misuse has become greater and we understand that this can give rise to concern. We will therefore endeavour to put effective safeguards in place to protect children and young people by minimising risk.

We are mindful of the fact that some families may have reasons why protecting a child's identity is a matter of particular anxiety. If you have special circumstances either now or at any time in the future which would affect your position regarding consent, please let us know immediately in writing.

Parents / carers will be notified in advance if any professional third parties (other than press photographers) will be filming or photographing in school. Parents / carers will have the right to put in writing any change to their consent as given on the attached form.

Parents / carers will be advised as to when children will be participating in webcam activities. Parents / carers will have the right to put in writing any change to their consent as given on the attached form.

Any digital images of children will be stored securely on school devices.

We have a specific policy regarding the use of images and also include the safe use of mobile phones and personal devices as part of our online safety policy, which is available on the school website.

To comply with the General Data Protection Regulations (GDPR) and the Data Protection Act, we need your permission before we can photograph or make any recordings of your child. If your child is old enough to express their own view, you may want to consult with them about categories of consent, and we invite you to use this letter to explore their feelings about being photographed at the setting.

A full copy of our Use of Photographic and Video Images of Children Policy is available online on the school website or is available as a hard copy upon request.

Please read and complete the attached forms and do not hesitate to contact me should you have any queries.

Yours sincerely,

Miss J Talbot

Headteacher

Godinton Academy Trust is a charitable company limited by guarantee and registered in England and Wales with company number 9404783. The registered office is at Lockholt Close, Ashford, TN23 3JR.



Using Photographic and Video Images of Staff - Staff Consent Form

Godinton Primary School would like to use your photograph for staff recognition purposes. These images may be used internally or on the school website. To comply with General Data Protection Regulations (GDPR) and the Data Protection Act, we need your permission to use photographs of you. Please answer the question below, then sign and date the form where shown. We will not use the images taken, or any other information you provide, for any other purpose.

Please return the completed form, even if you have chosen not to give your consent, to Jill Talbot, Headteacher.

For the purposes of this form the word staff applies to all teaching and support staff and governors.

	Please circle
	as appropriate
May we use your image internally for educational purposes? E.g. name	
badges, ID displays / posters, photos of school events	YES / NO
May we use your image on the school website?	
	YES / NO
Do you consent for your image to be taken by a third party for	
educational purposes? E.g. official school photo, use on other educational	YES / NO
website, use of webcam activity.	

Please confirm that you have read and understand the conditions for use (on the reverse of this form), and the notes relating to the principles of the Data Protection Act.

- I have read and understood the conditions of use.
- I confirm that I understand publication of my picture will mean that my picture will be viewable by those with access, alongside my job title and appropriate work contact details (e.g. school telephone number) and I consent to such processing of my personal data.
- I understand that if my picture and details are placed on the website and/or social media channels potentially this will be accessible by anyone in the world with internet access.

Name:
Signed:
Date:

Conditions of Use (Staff Consent Form)

- 1. This form is valid for the duration of your employment at Godinton Primary School. Your consent will automatically not apply to any other usage of the photos.
- 2. Images must only be used in circumstances where consent has been given. Signed consent must be given for images to appear on the website (which is viewable by potentially anyone), or they cannot be published in this way.
- 3. Under the GDPR and the Data Protection Act your rights include:
- a) Your consent (to the publication of your photo) can be withdrawn at any time (principle 1 of the Act)
- b) Your photo will not be used for any other purpose without your further consent (principle 2 of the Act)
- c) Your personal data will be accurately maintained and kept up to date (principle 4 of the Act)
- d) Publication of your photo will cease and all electronic copies will be deleted when you leave the setting (principle 5 of the Act)



HOW WE USE PHOTOGRAPHIC AND VIDEO IMAGES OF CHILDREN – GUIDANCE FOR STAFF

Type of Photographic / Video Activity	Parental / Carer Consent Required	Additional Information
May we use your child's image in the school? (E.g. on wall displays, photos stuck in their schoolbooks, celebration displays, name labels, assessments and medical alert posters).	Yes	Consent obtained through school consent form. This is for educational use only. Images will remain internal.
May we record your child's image or use videos for assessments, monitoring or other educational use? These images will be used internally only. This includes the use of tracking apps, essential in Foundation Stage (Reception classes) in which images may be shared with a child's parents.	Yes	Consent obtained through school consent form. This would include the use of an app such as Tapestry.
May your child's image be shared with other pupils? (E.g. Photo stuck into another child's book to record a group task, a class photo taken to record a special event and sent home to all in the class).	Yes	Consent obtained through school consent form. If parents have not given consent then their child's image should not be shared with others in the class.
May we use your child's image in our prospectus and other printed or digital publications that we produce for educational and promotional purposes, including the school newsletter?	Yes	Consent obtained through school consent form.Images will not be displayed with child's full name. IMAGES OF CHILDREN WHOSE PARENTS HAVE NOT GIVEN CONSENT MUST NOT BE USED.

May we use your child's image on our official school website? (This includes documents that might be uploaded to the website e.g. school newsletter).	Yes	Consent obtained through school consent form. Images will not be displayed with child's full name. IMAGES OF CHILDREN WHOSE PARENTS HAVE NOT GIVEN CONSENT MUST NOT BE USED.
May we use your child's image on other educational websites as a result of activities in which the school may be involved?	Yes	Consent obtained through school consent form. Images will not be displayed with child's full name. IMAGES OF CHILDREN WHOSE PARENTS HAVE NOT GIVEN CONSENT MUST NOT BE USED.
Do you consent for your child to be involved in webcam activities which are strictly controlled by the school for educational purpose only and which may be uploaded to educational websites?	No	Consent obtained through school consent form. Staff must notify parents to make them aware of when these activities are taking place, allowing them to modify their consent for the specific activity. IMAGES OF CHILDREN WHOSE PARENTS HAVE NOT GIVEN CONSENT MUST NOT BE USED.

May your child's photograph (individual) be taken by the school's official photographer? May your child's photograph (class or group) be taken by the school's official photographer?	Yes Yes	Consent obtained through school consent form. School will advise parents as to when these photos are taking place. IF PARENTS HAVE NOT GIVEN CONSENT THEN PHOTOS SHOULD NOT BE TAKEN. The school will only use a reputable photographer.
May your child's image (photographic or video) be taken by a third party approved by the school or shared with another educational establishment? E.g. trainee teacher completing a portfolio of evidence or image shared with another school as part of a local project.	Yes	Consent obtained through school consent form. IF PARENTS HAVE NOT GIVEN CONSENT THEN PHOTOS SHOULD NOT BE TAKEN. This would include: • Visitors taking photos (e.g. students) • Photos for a local community newsletter Photos must not be taken on mobile phones.
Are you happy for your child to appear in the media e.g. if a newspaper or television film crew attend an event organised by the school?	Yes	Consent obtained through school consent form. IF PARENTS HAVE NOT GIVEN CONSENT THEN PHOTOS SHOULD NOT BE TAKEN. Consent form makes parents aware that as the media are exempt from GDPR, photos may be accompanied by full names.

Video of child taken	Yes	Consent obtained through school consent form for videos. Separate permission obtained for videos used by the school and those taken by a third party. IMAGES OF CHILDREN WHOSE PARENTS HAVE NOT GIVEN CONSENT SHOULD NOT BE USED.
Video / filming by media for television	Yes	Consent obtained through school consent form Staff must write to parents making them aware of when these activities will take place, allowing them to modify consent for the specific activity IMAGES OF CHILDREN WHOSE PARENTS HAVE NOT GIVEN CONSENT SHOULD NOT BE USED. Often media companies will have their own consent form.
Parents filming or taking photographs at school events	No	Parents are made aware that images taken can be for personal use only.

Staff should consult with the DSL or DPO if they are unsure about any occasion in which a photographic or video image of a child may be taken.