

Children's Photography, Video & Online Image Use Policy

Applies to: All staff, volunteers, contractors, and third parties

1. Purpose

Fun Fest Holiday Clubs recognise the value of photography and video in celebrating children's experiences, demonstrating the quality of our provision, and helping parents understand our environment and activities.

We are also committed to safeguarding children and recognising evolving online risks, including the misuse, manipulation, and unauthorised sharing of images using digital and artificial intelligence (AI) technologies.

This policy sets out how we collect, store, and use children's images in a way that is safe, respectful, proportionate, and compliant with safeguarding and privacy expectations.

2. Principles

We will:

- Prioritise the safety, dignity, and wellbeing of children at all times.
- Use images to reflect genuine experiences and positive engagement.
- Minimise unnecessary identification of individual children.
- Obtain informed parental consent for photography and online use.
- Regularly review our practices in light of emerging online and AI-related risks.
- Balance safeguarding with the benefits of showing authentic experiences to families.

3. Why We Use Images

Images may be used to:

- Celebrate children's participation and achievements.
- Show parents the nature and quality of our activities.
- Promote our nursery, holiday clubs, and services.
- Demonstrate our learning environments and ethos.

Images may appear on:

- Our website
- Google My Business profiles
- Online listing sites
- Social media channels including Facebook, Instagram and WhatsApp
- Marketing materials

- Printed literature
- Internal displays or parent communications

4. Consent

We will obtain clear parental/carer consent to use their child's image for website, social media and printed marketing materials which:

- Will be requested in clear, accessible language.
- May be withdrawn at any time.
- Will be reviewed periodically and whenever circumstances change.

Staff are responsible for checking current consent records before taking or using images.

5. Safe Image Selection Standards

To reduce safeguarding and digital misuse risks, we will adopt a **“minimum necessary identification” approach.**

Where possible, we will prioritise:

Preferred Images (Low Risk)

- Group activity photographs
- Natural play and learning environments
- Wide-angle activity shots
- Images focused on activities, resources, or environments
- Images where children are not individually identifiable
- Side-on or rear-view photographs where appropriate

Use With Care (Medium Risk)

- Small group photos where children are recognisable
- Front-facing images used sparingly and with clear consent
- Event photographs where context and safeguarding considerations have been assessed

Avoid / Not Permitted (High Risk)

We will avoid:

- Close-up portraits used extensively in public-facing content
- Images where one child is the clear and repeated focus of marketing

- Images linked to full names
- Identifiable locations, or information that increases traceability
- Images showing children in distress, vulnerable situations, swimwear, changing areas, toileting contexts, or reduced clothing
- Children eating
- Children holding certain objects that could be manipulated out of context eg javelins
- Content that could be misinterpreted, manipulated, or compromise dignity

6. Social Media Use

We recognise that publicly accessible platforms increase exposure and reduce control over how images may be copied or shared.

For this reason:

- We will use a curated and proportionate approach to children's imagery.
- We will avoid excessive posting of identifiable children.
- We may prioritise wider activity shots rather than close-up portraits.
- Richer day-to-day image sharing may be provided through secure parent communication systems where appropriate.

7. AI and Digital Misuse Risks

We recognise increasing concerns regarding image scraping, editing, and AI-generated misuse of publicly available content.

While no online system can eliminate risk entirely, Fun Fest Holiday Clubs will take reasonable safeguarding measures by:

- Limiting highly identifiable imagery.
- Reducing repeated use of the same child's image in public-facing materials.
- Reviewing online content periodically.
- Removing images where concerns arise.
- Monitoring emerging safeguarding guidance and adapting practice where necessary.

8. Staff Responsibilities

All staff must:

- Follow consent preferences.
- Use only approved devices or systems for photography.

- Never store children's images on personal devices unless explicitly authorised.
- Upload images securely and promptly.
- Raise concerns about inappropriate image use immediately.

Unauthorised photography, sharing, or storage of children's images may result in disciplinary action.

9. Parent and Visitor Photography

Only approved visitors who have read and understood this policy will be allowed to take photographs or footage at clubs and events and:

- Respect for all children's privacy must be maintained.
- Images should not be shared publicly if they include other children without permission.
- The organisation reserves the right to restrict photography where safeguarding concerns arise.

No one control can eliminate misuse entirely and therefore we will apply a combination of image selection, consent, proportional use, and ongoing review to try to prevent such an event happening.

10. Responding to Suspected Image Misuse or Digital Exploitation

If Fun Fest becomes aware that images of children have been copied, manipulated, distributed without permission, or used in a way that may place children at risk, we will respond promptly and proportionately.

Our response may include:

- Taking immediate steps to secure, remove, or limit access to affected content where possible
- Preserving relevant information and evidence to support investigation
- Reporting concerns to appropriate authorities, safeguarding agencies, law enforcement, regulatory bodies, platform providers, or other relevant organisations where appropriate
- Not engaging with, negotiating with, or making payments in response to demands, extortion attempts, or ransom requests
- Completing an internal safeguarding and risk assessment process
- Making reasonable efforts to inform affected families where this is lawful, appropriate, and does not compromise an investigation
- Providing updates to affected families where appropriate and in line with advice from investigating authorities
- Reviewing internal practices and implementing lessons learned to strengthen future safeguards

Detailed operational procedures for incident management and escalation are contained within our Safeguarding policy.

11. Review

This policy will be reviewed annually, or sooner if:

- safeguarding guidance changes,
- technology or AI-related risks evolve,
- concerns or incidents arise.

This policy was adopted on	Signed on behalf of the Club	Date for review
27/05/2026	Lynne Newman	27/05/2027