



Executive Headteacher: Mrs Maria-Anne Higgins
Executive Assistant Headteacher: Mrs Shelley Steer

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Townley School & Nursery
 Crown Road,
 Christchurch, Wisbech,
 PE14 9NA
 office@townley.cambs.sch.uk
 Tel: 01354 638229
www.townley.cambs.sch.uk



Friday Bridge Primary School
 Maltmas Drove
 Friday Bridge, Wisbech
 PE14 0HW
 office@fridaybridge.cambs.sch.uk
 Tel: 01945 860220
www.fridaybridge.cambs.sch.uk



Use of Images, Mobile Phones and Other Devices Policy

1.0 Introduction and aims

Collection, storage and sharing of personal data, including photographic images of children and young people, is governed by the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. Photographic images of children and young people are not automatically considered to be special category personal data:

*‘The processing of **photographs** should not systematically be considered to be processing of special categories of personal data as they are covered by the definition of biometric data only when processed through a specific technical means allowing the unique identification or authentication of a natural person.’*

Recital 51 of EU GDPR, May 2018

It is widely recognised that many children and staff will have access to personal communication devices including mobile phones, smart phones and smart watches. Children using these devices are likely to have unlimited and unrestricted access to the internet via mobile networks such as 4G/5G, Airdropping and ‘Nearby Share’ (see Annex 1 for more details). For many these devices can provide security and reassurance; however, there are also associated risks. Safeguarding children within the school is paramount.

Effective guidance is in place to avoid the use of mobile, smart phone and smart watches causing unnecessary disruptions and distractions within the workplace, and to ensure effective safeguarding practice is promoted to protect against potential misuse. This policy is designed to offer practical advice to schools in order for them to comply with legislation and safeguard the children in their care, whilst enabling families to experience pleasure and pride at their children’s achievements through the use of technology.

The terms ‘phone’ or ‘mobile phone’ in this guidance denotes mobile phones, smart phones, airpods, iPods, iPads, MP3 players, MP4 players and smart watches.

There is a separate section covering Air Tags.

1.1 The guidance aims to:

- Set out clear guidance for the use of mobile phones for staff (including supply staff), pupils and volunteers
- Set out clear guidance for visitors and contractors.
- Ensure robust safeguarding
- Support schools’ other policies relating to child protection and behaviour

2.0 Staff responsibilities

All staff (including teachers, support staff, and supply staff) may wish to have their personal mobile phones at work for use in case of emergencies, however, there is a clear expectation that all personal use is limited to areas and times when there are no children present or likely

to be present. If staff are waiting for emergency calls they should use the school office telephone number or leave their mobile phone with school office staff.

2.1 All staff:

- The school expects staff to lead by example and therefore should not make or receive personal calls, or texts (via mobile phone or smart watch), whilst children are present or during contact time.
- Staff (including volunteers and supply staff) should only use their mobile phones and smart devices for personal contact in the designated areas - staff room or office.
- Other than in agreed exceptional circumstances, mobile phones should be switched off or on silent and left in a safe place (at Townley this should be your staff locker, at Friday Bridge in the teachers cupboard in the classroom) and smart watches silenced during lesson times.
- For both staff and pupils, the school retains no liability for any device that is brought into school which is either lost, stolen or damaged
- For both staff and pupils, the school retains no liability for any device that is used in a manner that is against the owners consent.
- Staff, students or volunteers who ignore this policy and use a mobile phone or other technological device on the setting premises without permission may face disciplinary action.

2.2 Safeguarding

- Staff should not contact pupils or parents from their personal mobile phone in or out of school time or give their mobile phone number to pupils or parents. If a member of staff needs to make telephone contact with a pupil, a school telephone should be used.
- Staff should not share personal contact details through social media and messaging apps.
- Staff should regularly monitor and update their privacy settings on social media sites.
- Staff should never accept a 'friend request' or respond to any posts that may deliberately or inadvertently include them but inform their headteacher of the contact.
- Staff should never send to, or accept from colleagues or pupils, texts or images that could be viewed as inappropriate.
- Staff are not permitted to take photos or videos of pupils or anything else (e.g., voice recordings) that might identify the pupil.
- If photos or videos are being taken as part of the school curriculum or for promotional purposes, then school equipment must be used. Staff should not allow themselves to be photographed by a pupil(s).
- The setting's main phone number can be used for emergencies.

- Where there is a suspicion that the material on a mobile phone or technological device may be unsuitable and may constitute evidence relating to a criminal offence, The 'Allegations of Abuse' process will be followed (please refer to the school's 'Safeguarding and Child Protection Policy').
- Only the camera and other technological devices belonging to the school may be used to take appropriate and relevant images of children, i.e. observations, photographs of setting events and off-site trips.
- Images must be used in accordance with the UK GDPR and Data Protection Act 2025.
- Where there is a safeguarding concern where abuse is suspected, the setting should not take images of a child's injury, bruising or similar even if requested by Children's Social Care. (Guidance for safer working practice for those working with children and young people in education settings, February 2022). The 'Log of Concern and Body Map' must be used to record all factual observations where abuse is suspected

2.3 Using a personal mobile for work purposes

In some circumstances, it may be appropriate for staff to use a personal mobile phone for work purposes. Where possible this should always be agreed with a line manager or Senior Leader in advance. Such circumstances may include, but are not limited to:

- Emergency evacuations
- Parental contact in emergencies (mobile phones setting that allow for the number not to be identified should be used)
- Outings and off-site visits.

This guidance should be seen as a safeguard for members of staff and the school. Any breach of school policy may result in disciplinary action against that member of staff.

3.0 Pupils:

- Pupils are dissuaded from bringing mobile phones to school.
- If it is deemed necessary for a pupil to bring a mobile phone to school, (e.g., in the case of older pupils because they travel to and from school independently), then the expectation is that the pupil hands their phone into the school office as soon as they arrive at school.
- Smart Watches (those watches that can record images or audio, must not be worn to school. Where a pupils has worn a device to school, it must be stored in the school office.
- For both staff and pupils, the school retains no liability for any device that is brought into school which is either lost, stolen or damaged
- For both staff and pupils, the school retains no liability for any device that is used in a manner that is against the owners consent.

- Pupils should not use their mobile phone on school site.
- Pupils should not take unsolicited photos of staff or other pupils.

4.0 Parents, visitors and contractors:

Parents, visitors and contractors are respectfully requested not to use their mobile phones at all on the school site where children are present.

- Should phone calls and/or texts need to be taken or made, use is restricted to those areas not accessed by children to avoid any unnecessary disturbance or disruption to others.
- Should phone calls/and or texts need to be taken or made, visitors are asked to leave the premises to do so.
- Photos of children must not be taken without prior discussion with a member of the Senior Management Team and in accordance with the UK *General Data Protection Regulations (GDPR) and the Data Protection Act 2018* and using the 'Use of images consent form'

(please refer to the Education Safeguarding Team's document "Guidance for schools and other establishments on the use of images" 2025).

- Any individual bringing a personal device into the school must ensure that it contains no inappropriate or illegal content.

5.0 Apple Air Tags and other tracking devices

Such devices are designed to help people locate personal belongings but have been known to be used to track individuals.

Apple have released the statement below which can be found on their website

"AirTag was designed to help people locate their personal belongings, not to track people or another person's property, and we condemn in the strongest possible terms any malicious use of our products."

Therefore, we do not allow the use of Air Tags or any other form of tracking device in relation to a pupil, either while in school or when on school trips or residential visits.

All consent slips which parents sign prior to taking part in a trip will state that such devices will not be allowed under any circumstances and must not be hidden in pockets/bags etc.

If any tracking devices are found in a pupil's clothing or in any personal belongings, they will not be allowed on the trip and will be returned to school.

6.0 Inappropriate or illegal content:

Where there is a suspicion that the material on a mobile phone may be unsuitable and may constitute evidence relating to a criminal offence, the allegations process will be followed (please refer to the school's 'Safeguarding and Child Protection Policy').

7.0 Filtering of Personal Devices:

School cannot be held responsible for the filtering of material on users' personal devices when they access the internet using their personal 4G/5G data plan. Any individual, staff or pupil, found to have been accessing material which contravenes the school's Acceptable Use Policy applicable to them during school hours will be subject to action under the terms of the school Behaviour Policy/Code of Conduct.

Anyone using a personal device to access the internet using the school network connection will have the web content on that device filtered by Netsweeper at the strictest level in use at that school. Schools can view logs of activity that have occurred on specific devices and action may be taken where user activity raises a safeguarding concern.

- For both staff (including supply staff), pupils, visitors and contractors the school retains no liability for any device that is brought into school which is either lost, stolen or damaged
- For both staff (including supply staff), pupils, visitors and contractors, the school retains no liability for any device that is used in a manner that is against the owner's consent.

8.0 Use of Images

Collection, storage and sharing of personal data, including photographic images of children and young people, is governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018. Photographic images of children and young people are not automatically considered to be special category personal data.

The use of images can be divided into five categories:

- Images taken by the school which are required for the school to perform its public task;
- Images taken by the school which do not fall under the public task purpose;
- Images taken by parents at school events;
- Images taken by the media;
- Images taken by third parties.

8.1 Images taken by school required for the school's public task

If the images taken are necessary for the school to perform its public duty, consent is unlikely to be required. Examples may include photographs taken of a child in the Early Years Foundations Stage for inclusion in their learning journal; photographs taken to enable staff to identify children with medical conditions/dietary needs; photographs taken of a learning task for use on a school display board.

More information can be found in 'Data Protection: A toolkit for schools,' (DfE, Update - August 2024), which gives these useful examples.

- *Photographs used in identity management may be essential for performing the public task of the school but should be deleted once a child is no longer at that setting, as it is no longer needed for the purpose for which it was held.*
- *Photographs in the school environment relative to providing education may fall under the public task purpose, but after the child has left the school, this argument becomes weak and may not be lawful: permission to retain beyond their time in school (if required) should be sought. For example, if the child is in a display showing a scientific experiment being done that you wish to retain as a learning resource for future years.*

'Data Protection: A toolkit for schools', (DfE, Update - August 2024)

Even if consent is not required, consideration still needs to be given to the devices staff use to take images, how such images will be securely stored, and the length of time images will be retained for.

Images must be maintained securely for authorised school use only and destroyed as appropriate when no longer required.

Care should be taken in relation to particularly vulnerable children such as those who are in public care, recently adopted or those resettled following domestic violence.

Photographs must only be stored on TEAMS in the School Photographs Team, in the channel for the current year, this is to ensure photographs can be deleted in a timely manner. Photographs should only be stored on devices until they have been uploaded to the TEAMS Channel (typically this should not be for more than a week). The only exception to this is individual photographs used in the school MIS.

8.2 Images taken by school not required for the school's public task

If images are taken by the school which do not fall under the public task purpose, then parental consent will be required. Examples include images taken for the school's prospectus, website or social media pages.

- Photographs used in promoting/marketing type material should seek specific informed consent, and only be used in line with the consent provided.

'Data Protection: A toolkit for schools', (DfE, Update - August 2024)

A signed consent form should be obtained from the child's parent/carer, and should be kept on the child's file, covering all cases where images of children are to be used. This is collected on the child's admission form and is updated using a Microsoft 'Forms Quiz' annually. **The UK General Data Protection Regulations state that consent must be actively given; i.e. parents have to return a signed consent form rather than consent being assumed and parents returning a form to withdraw consent. It is also necessary that it is made explicit what personal data will be used for, therefore a multiple opt-in form may be required.**

It is important to take into account the wishes of the child, remembering that some children do not wish to have their photograph taken.

Parents may withdraw/change their consent at any stage, but they would need to do so in writing.

- If the pupil is named, avoid using the photograph.
- If the photograph is used, avoid naming the pupil.

Whatever the purpose of displaying or publishing images of children, care should always be taken to avoid the possibility that people outside the school could identify and then attempt to contact pupils directly. Most abused children are abused by someone they know, but there is still a concern that children might be identified from pictures appearing online and targeted for abuse.

- Where possible, general shots of classrooms or group activities rather than close up pictures of individual children should be used. The camera angles should be considered. Photographs taken over the shoulder, or from behind are less identifiable.
- Children should be in suitable dress, and images of PE or swimming events should maintain modesty, for example wearing team tracksuits if appropriate.
- Children from different ethnic backgrounds should be included in your communications wherever possible, as well as positive images of children with disabilities to promote the school as an inclusive community, and to comply with the Disability Discrimination Act.
- Children can be identified by logos or emblems on sweatshirts etc. Depending on the use to which the photograph will be put, airbrushing logos should be considered.
- An article could be illustrated by the children's work as an alternative to using an image of the child.

8.3 Parents wishing to take images at school events

Increasingly technology is making it easier for images to be misused and it is therefore important that schools take practical steps to ensure that images of children taken by parents and carers are done so in a way that is in accordance with the protective ethos of the school.

School staff will consider a special photo call session at the end of the event – this would avoid distraction and disturbance and also allow for the withdrawal of children whose parents/carers have not consented. The teacher in charge at an event will need to remind parents not to use their personal devices and inform parents and carers if there will be an opportunity to take photographs at the end of their own children only.

Wherever possible school staff take their own 'official' photos or films in order to retain control over the images produced and to ensure the safety of children.

It is also important to ensure that people with no connection with our school do not have any opportunity to produce images covertly.

Staff must question anyone who is using a camera, phone or other handheld device at events.

Related Policies and guidance:

Model Safeguarding and Child Protection Policy (September 2025)

Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings February 2022 - [Safer Recruitment Consortium training information](#)

Keeping Children Safe in Education (September 2025)

School's Acceptable Use Policy

Guidance for schools and other establishments on the use of images" 2025

[Mobile phones in schools - February 2024](#)

[Taking photographs: data protection advice for schools | ICO](#)

Data Protection: [Data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](#)

Annex 1- Airdrop and Nearby Share

Airdrop.

- Airdrop is a wireless feature available on Apple devices.
- It allows physically close Apple devices to share files, photos, websites etc.
- There are no size limits on files.
- It uses Bluetooth and Wi-Fi to transmit the files.
- Airdrop automatically detects nearby supported devices within a maximum distance of 30 feet.
- When a receiver of content is selected, they will be notified and offered the option to accept or decline the incoming file.

Quick Share/Nearby Share

- Both are available on Android 6.0+ phones.
- Like Airdrop, it allows users to instantly share files, links and pictures with people around them.
- It also works through Bluetooth or WiFi.
- When Nearby Share/Quick Share are turned on, a list of devices available within sharing proximity is visible.
- When a receiver of content is selected, they will be notified and offered the option to accept or decline the incoming file.

Safeguarding risks posed by both Airdrop and Nearby Share/Quick Share.

- Being exposed to age-inappropriate sexualised and/or violent content.
- Photo sharing as a form of cyberbullying, with the person featured in the image being the target.
- The sharing of [self-generated sexual imagery](#), with or without the permission of the original image/video creator.
- Images of teachers or other staff members shared as part of teacher targeted bullying, including 'upskirting' images (the practice of taking an illegal photo of someone's genitals or genital area, without consent).
- If a member of staff or a pupil report receiving inappropriate content then the school must follow their Safeguarding and Child Protection Policy and procedures, Behaviour Policy and/or Code of Conduct.

