

PHOTOGRAPHY & USE OF IMAGES POLICY

Bury Tuition Centre

Part of North West Education Hub Ltd

1. Purpose and Scope

Bury Tuition Centre recognises that photographs, video and other recorded images can support learning, celebrate achievement and help communicate the work of the Centre. We also recognise that an identifiable image of a student is personal information and that the use of children's images requires particular care.

This policy explains how Bury Tuition Centre takes, uses, stores and shares photographs and video in a way that protects students' privacy, dignity and safety. It applies to staff, tutors, students, parents/guardians, visitors, contractors and external photographers acting in connection with the Centre.

This policy should be read alongside the Safeguarding / Child Protection Policy, E-Safety (Online Safety) Policy, Data Protection & Privacy Policy and Behaviour & Code of Conduct Policy.

2. Principles

- Images will only be taken or used for a clear and legitimate purpose.
- Students will be represented respectfully and in an appropriate context.
- The Centre will minimise unnecessary identifying information when publishing images.
- Photography/video for external promotion is optional and is not a condition of receiving tuition.
- The wishes, welfare and dignity of the student will be considered as well as the parent/guardian's recorded preference.
- Images will be stored, accessed, retained and deleted in accordance with the Centre's data-protection and safeguarding arrangements.

3. Permissions and the Enrolment Process

The new online enrolment form will ask the parent/guardian to select one of the following photography/video preferences:

- Internal educational use only (for example, appropriate classroom or educational purposes).
- Internal use and external promotional use (for example, the Bury Tuition Centre website, official social-media channels or promotional materials).
- No photography/video consent.

No photography/video option will be pre-selected. A parent/guardian may choose not to permit promotional photography without affecting the student's access to tuition.

For adult learners, the learner will make their own selection. As children mature, the Centre will also take account of the child or young person's own wishes and understanding. A student will not normally be required to participate in a photograph or recording if they are uncomfortable, even where parental permission exists.

The Centre will keep a record of the preference selected and, where technically available, the date/time and version of the relevant permission wording.

4. Lawful and Transparent Use

Where an identifiable photograph or video is used by Bury Tuition Centre for official purposes, data-protection law is likely to apply. North West Education Hub Ltd, trading as Bury Tuition Centre, will ensure that there is an appropriate lawful basis for the processing and that students and/or parents/guardians are informed about the intended use.

The permission choices in the enrolment form provide families with practical control over photography and promotional use. They should not be interpreted as meaning that consent is necessarily the UK GDPR lawful basis for every possible image-processing activity; the applicable lawful basis will depend on the purpose and circumstances.

5. Internal Educational Use

Where the recorded preference permits internal use, images may be used for legitimate Centre purposes such as:

- supporting teaching or learning activities;
- celebrating work or achievement within the Centre;
- internal displays or presentations where appropriate;
- staff training or quality improvement where the use is necessary, proportionate and appropriately controlled.

Internal-use permission does not authorise publication on the public website, public social-media accounts or external promotional materials.

6. External Promotional Use

External promotional use will only take place where the recorded preference permits it and the proposed use is appropriate. This may include the Bury Tuition Centre website, official social-media channels, printed brochures, banners or other Centre promotional materials.

- The Centre will avoid publishing unnecessary personal details with an image.
- A student's full name will not normally be published alongside an image. If there is a genuine reason to identify a student by name, this will be considered separately and specific permission sought where appropriate.
- The Centre will consider whether the location, uniform, background, metadata, accompanying text or other details could create an avoidable safeguarding or privacy risk.
- Images will not be altered or presented in a misleading, demeaning, sexualised or inappropriate manner.

7. Taking Images and Approved Devices

Official photographs/video should be taken using Centre-approved equipment or another specifically authorised arrangement wherever practicable.

- Staff must not routinely use personal devices to photograph or record students.
- Where exceptional use of a personal device is specifically authorised for a legitimate Centre purpose, the image must be transferred promptly to approved Centre storage and removed from the personal device, including any automatic cloud backup where reasonably possible.

- Students must not photograph, film or record another student or member of staff during tuition without permission.
- Visitors and contractors must follow staff instructions concerning photography and recording.

8. Safeguarding and High-Risk Images

The safety of the child takes priority over publicity or promotional considerations. Before taking or publishing an image, staff should consider whether there is any known reason why doing so could increase risk to the student.

- Where a student is subject to a safeguarding restriction, confidentiality requirement or other identified risk, staff must follow the specific safeguarding instructions recorded for that student.
- Images must not show children in situations that could reasonably be considered undignified, unsafe or inappropriate.
- Care must be taken around changing areas, toilets, medical treatment, personal care and other situations where photography would be inappropriate.
- Concerns about misuse, coercive image-taking, cyberbullying, manipulated/deepfake imagery or unauthorised sharing will be treated as safeguarding and/or online-safety concerns.

If staff become aware of nude or semi-nude imagery involving a person under 18, they must not routinely view, copy, print, forward, save or ask the child to send the image. The matter must be reported immediately to the DSL or Deputy DSL and managed under the Centre's safeguarding procedures and current UKCIS guidance.

9. Parents / Guardians and Visitors Taking Images

At some Centre events or celebrations, parents/guardians may be permitted to take photographs or video for personal use. The Centre may restrict or prohibit photography where this is necessary for safeguarding, privacy, safety or the effective running of the event.

- Parents/guardians should focus on their own child wherever possible.
- They must follow any instructions given by the Centre about where and when photography is permitted.
- They should not publish or share identifiable images of other students publicly without appropriate permission.
- A family's permission for Bury Tuition Centre to use an image does not automatically give another parent, visitor or third party permission to use that image for their own public or commercial purposes.

10. External Photographers, Media and Contractors

Where an external photographer, videographer, media organisation or contractor is engaged or invited by the Centre:

- families will be informed where appropriate about the nature and purpose of the photography;
- the Centre will make clear which students may or may not participate;
- the provider must follow relevant safeguarding and data-protection requirements;
- access to students and Centre premises will be appropriately managed and supervised;
- where the third party processes images on behalf of the Centre, appropriate contractual/data-processing arrangements will be used;
- where an external organisation intends to use images for its own purposes, the Centre will consider the separate privacy information and permissions required before participation.

11. Storage, Access and Retention

- Official images will be stored in approved, access-controlled Centre systems rather than being retained unnecessarily on personal devices.
- Access will be limited to authorised staff who require it for their role.
- Images will be retained only for as long as reasonably necessary for the purpose for which they are held, in line with the Centre's Data Protection & Privacy Policy and internal retention arrangements.
- When images are no longer required, they will be securely deleted or otherwise disposed of appropriately.
- Where a security or data breach involving images occurs, it will be managed under the Centre's data-breach procedures.

12. Changing or Withdrawing a Photography Preference

A parent/guardian, adult learner or a sufficiently mature young person may contact the Centre if they want a photography/video preference reviewed or changed. The Centre will make the process straightforward and will update its records as soon as reasonably practicable.

Where future promotional use is no longer permitted, the Centre will stop using the image for new promotional activity and will remove it from Centre-controlled digital channels where reasonably practicable. Withdrawal or a change of preference does not necessarily require the Centre to recall or destroy printed material already produced or copies already lawfully distributed, although safeguarding and welfare considerations will always be considered.

13. Student Images Created for Identification or Administration

A photograph collected for identification, safeguarding, administration or another necessary operational purpose is separate from promotional photography. Where such an image is required, the Centre will explain its purpose and handle it under the Data Protection & Privacy Policy. A family choosing "no promotional photography" does not automatically prevent the Centre from processing an image where it is genuinely required for another lawful and necessary purpose.

14. Breaches and Misuse

Suspected misuse of photographs or video will be taken seriously. Depending on the circumstances, action may include:

- requiring material to be removed or no longer used;
- restricting photography at Centre activities;
- action under the Behaviour & Code of Conduct Policy;
- staff management or disciplinary action;
- a data-protection incident/breach assessment;
- a safeguarding referral to the DSL/Deputy DSL;
- referral to the police, children's social care, the ICO or another appropriate agency where required.

15. Safeguarding Contacts

Designated Safeguarding Lead (DSL)

Shazia Tahir

Email: safeguarding@northwesteducationhub.co.uk

Phone: 07527 675842

Deputy Designated Safeguarding Lead (Deputy DSL)

Nazia Younis

Email: info@northwesteducationhub.co.uk

Phone: 07485 184081

16. Related Policies

- Safeguarding / Child Protection Policy
- E-Safety (Online Safety) Policy
- Data Protection & Privacy Policy
- Behaviour & Code of Conduct Policy
- Equality, Anti-Bullying & Complaints Policy
- Terms & Conditions

17. Monitoring and Review

This policy will be reviewed at least annually and sooner where required because of a safeguarding incident, data-protection concern, significant change in technology or social-media practice, change to the Centre's systems or updated legislation/guidance. Photography/video preference records will be kept accurate and relevant staff will be made aware of restrictions that affect their work.

18. Legal Entity

Bury Tuition Centre is a trading name of North West Education Hub Ltd.

Policy Information

Policy Owner	Nazia Younis (Director / Deputy DSL)
Policy Reviewed	August 2026
Next Review Due	August 2027
Version	2.0