



## Twistin Tots Image Use Policy

*This policy applies to activities undertaken by any of the Twistin Tots' Brands, including but not limited to Twistin Tinies Adventures, Twistin Tikes, Twistin Tikes Golden*

### Introduction

This Image Use Policy applies to the use of any film and electronic photographic equipment used at Twistin Tots activities. This will include cameras, mobile phones, tablets and any other form of digital technology and resource for storing and printing images.

Digital technology has increased the potential for cameras and images to be misused and inevitably there are concerns about the risks to which children may be exposed. However we understand and are aware that the behaviours of individuals using the technology present the risk, not the technology.

Most children who suffer abuse are abused by someone they know. We have taken the view, in consultation with other agencies, that the risk of a child being directly targeted for abuse through being identified by a stranger is small. By taking reasonable steps to make certain that a photograph is appropriate and the full name and contact details are protected if required by the parent/guardian, then photography for use in our activities by staff, families and the media should be allowed.

We are aware that the widespread use of mobile telephones as digital cameras would make banning them very difficult for us to impose and police. Generally photographs for Twistin Tots and family use, and those that appear in the press are a source of pleasure and pride. They enhance self-esteem for children and their families and this practice should continue within the safe practice guidelines detailed below.

### Policy Statement

This Policy seeks to ensure that images and videos taken within and by Twistin Tots are taken and held legally and the required thought is given to safeguarding all participants at classes. It applies to all images (including still and video content) taken by Twistin Tots. It applies to all staff, the management, volunteers, students, visitors to classes and other individuals who may work for, or provide services to Twistin Tots as well as parents/guardians and children who participate in our classes and other activities.

### Confidentiality

All images taken by Twistin Tots will be used in a manner respectful of the General Data Protection Regulations (GDPR).

This means that images will be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject



- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Accurate and, where necessary, kept up to date
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purpose
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### **Compliant with GDPR**

Twistin Tots' Owner, Jacqui Davis is the Data Protection Officer and will be responsible for ensuring the acceptable, safe use and storage of all camera technology and images for Twistin Tots. This includes the management, implementation, monitoring and review of this Image Use Policy.

Any Franchisees will be required to become their own DPO and adhere to this Image Use Policy. They will be responsible for adherence to this Policy and safe usage of images within their own Territories, in accordance with this policy.

Jacqui Davis has the authority to view any images taken and/or to withdraw or modify a member of staff's authorisation to take images at any time. All members of staff, students, volunteers, visitors should be aware that all images taken at classes or other Twistin Tots activities are available for scrutiny and that they must be able to justify any images in their possession.

Written permission from parents/guardians will be obtained where possible before images/videos of children are taken, used or published. This will usually be by way of the parent's registration form completed when joining Twistin Tots activities and updated annually.

In addition, if images/videos are to be taken at a specific activity, the Class Leader will again ask for permission – on each occasion - to take photographs/images at these activities in the event that parents have changed their mind since they gave their first consent.

Twistin Tots will not prevent parents from taking pictures/videos of their own children at classes – this is part of the enjoyment of signing up for classes like Twistin Tots. However, parents will be asked not to share any images that contain other people's children on any form of social media without the express permission of the affected family by the appropriate parent.

Written parental consent will always be sought to take and use photographs offsite for professional, marketing and training purposes. This may be in addition to parental permission sought for onsite images.



Written consent from parents/guardians will be kept by Twistin Tots 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 an annual basis for general consent and on a case by case basis for specific events. A record of all consent details will be kept securely on file. Should permission be withdrawn by parents/guardians at any time, then all relevant images will be removed and disposed of and the record will be updated accordingly, unless these are already in use in printed material, in which case on reprinting, the images will be removed/replaced.

### **Safety of Images and Videos**

Staff will receive information regarding the safe and appropriate use of images as part of their Twistin Tots 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.

All staff are responsible for ensuring that all photographs are permanently wiped from phones, memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use, or on leaving the employ of Twistin Tots.

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

### **Publication and sharing of images and videos**

The full names of children will not be used on the website or other publication (e.g. newsletters, social media channels) in association with photographs or videos without the express permission of the parent.

Parents/guardians and staff members with particular concerns must always be able to withhold their consent for the publication or sharing of images for whatever reason.

Parents who give consent for images to be used / shared will be able to determine where they are used / shared. For example, parents may be happy for photographs / videos of their child to be used for Twistin Tots training purposes, but not made available publicly. Similarly, parents may be happy for images to be used on the Twistin Tots website or in printed publicity material, but not on social media.

### **Use of Images of Children 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.

A written agreement will be sought between parents and carers and the press which will request that a pre-agreed and accepted amount of personal information (e.g. first names only) will be published along with images and videos.



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.

### **Use of Professional Photographers**

Professional photographers who are engaged to record any events will be prepared to work according to the terms of this Image Use Policy.

Photographers may be asked to sign an agreement which ensures compliance with the General Data Protection Regulations and that images will only be used for a specific purpose, subject to parental consent.

Photographers will not have unsupervised access to children.

This policy was first adopted: 12 August 2020

Updated June 2022.