

Childrens Images and Marketing

A practical self-audit for photographs and videos used in websites, social media, email and printed marketing.

How to use this check-up

Work through each question and mark Yes, No or Not sure. A No or Not sure answer does not automatically mean that you have broken the law. It identifies something to review before you continue using children's images in your marketing.

1. Why are you taking and using images?

Check	Your answer
We have written down the specific reasons we take photographs or videos and how they support our activities or marketing.	Yes ☐ No ☐ Not sure ☐
We know which lawful basis we rely on for each use. We have not simply assumed that all photographs require consent or that one permission covers every use.	Yes ☐ No ☐ Not sure ☐
We avoid taking or publishing images that are not reasonably necessary for the purpose we have identified.	Yes ☐ No ☐ Not sure ☐
We consider the child's best interests and privacy before our commercial interest in obtaining attractive marketing content.	Yes ☐ No ☐ Not sure ☐

2. Are your permissions clear and current?

Check	Your answer
Where we rely on consent, it is a genuine choice and refusing permission does not disadvantage the child.	Yes ☐ No ☐ Not sure ☐
Our request for permission is separate from our general terms and privacy information, and it uses clear language.	Yes ☐ No ☐ Not sure ☐
Parents or carers can choose between different uses, rather than having to agree to one blanket permission for everything.	Yes ☐ No ☐ Not sure ☐
We explain where images may appear - for example our public website, particular social media accounts, emails, adverts, printed materials or third-party publicity.	Yes ☐ No ☐ Not sure ☐
We keep evidence of what was agreed, when it was agreed and the version of the wording shown at the time.	Yes ☐ No ☐ Not sure ☐
We review older permissions before reusing images for a new campaign, platform or purpose.	Yes ☐ No ☐ Not sure ☐

3. Could the child be identified?

Check	Your answer
We look at the whole post, not just the image, when deciding whether a child could be identified.	Yes ☐ No ☐ Not sure ☐
We avoid combining an image with unnecessary names, ages, locations, school or club details, schedules, uniforms or other identifying information.	Yes ☐ No ☐ Not sure ☐
We check the background and metadata for information that could reveal a location or identity.	Yes ☐ No ☐ Not sure ☐
We deliberately decide when to use alternatives such as non-identifiable activity shots, hands or equipment, rear views or carefully framed group images.	Yes ☐ No ☐ Not sure ☐

4. Do staff and suppliers follow the same rules?

Check	Your answer
Staff, session leaders and volunteers know who may take images, on which devices and for which purposes.	Yes ☐ No ☐ Not sure ☐
We do not allow children's images to remain on personal phones or personal cloud accounts after an authorised transfer.	Yes ☐ No ☐ Not sure ☐
Photographers, designers, social media managers and other suppliers receive clear written instructions about access, use, storage, return and deletion.	Yes ☐ No ☐ Not sure ☐
We check the terms and privacy arrangements of the marketing platforms and tools to which we upload children's images.	Yes ☐ No ☐ Not sure ☐
We monitor whether a platform claims rights over uploaded images, including permission to reuse them, train AI on them or create AI-edited versions, and we change our approach where those terms create an unacceptable risk.	Yes ☐ No ☐ Not sure ☐
Nobody uploads children's images to an AI tool, image generator or editing service unless that use has first been deliberately assessed and authorised.	Yes ☐ No ☐ Not sure ☐

5. Are storage and old images under control?

Check	Your answer
We know where the original images and copies are stored, including shared drives, design tools, phones, social media schedulers and archives.	Yes ☐ No ☐ Not sure ☐
Access is limited to people who need it, and accounts and devices are appropriately secured.	Yes ☐ No ☐ Not sure ☐
We have a retention period or regular review process rather than keeping every image indefinitely just in case it may be useful.	Yes ☐ No ☐ Not sure ☐

Check	Your answer
We periodically review old website galleries, scheduled posts, saved campaigns and printed materials and remove material we no longer need.	Yes ☐ No ☐ Not sure ☐
Our privacy information accurately explains how we use, share and retain children's images.	Yes ☐ No ☐ Not sure ☐

6. Can you deal with withdrawal and objections?

Check	Your answer
Parents, carers and, where appropriate, children can easily find out how to ask us to stop using an image.	Yes ☐ No ☐ Not sure ☐
We have a recorded process for locating the image, updating our permission record and stopping our own future use promptly.	Yes ☐ No ☐ Not sure ☐
We tell the relevant staff, suppliers or franchisees when an image must no longer be used.	Yes ☐ No ☐ Not sure ☐
Our wording explains honestly that withdrawal can stop our future use but cannot guarantee removal of copies already downloaded, shared, cached, screenshotted or printed.	Yes ☐ No ☐ Not sure ☐
We record what action was taken and respond clearly to the person who made the request.	Yes ☐ No ☐ Not sure ☐

7. Have you considered today's wider risks?

Check	Your answer
We consider whether a public image could be copied, combined with other information, manipulated or used to create a deepfake.	Yes ☐ No ☐ Not sure ☐
We use the minimum identifying detail needed and choose more privacy-protective images where the marketing benefit is small.	Yes ☐ No ☐ Not sure ☐
We revisit our approach when technology, platforms, audiences or the way we market changes.	Yes ☐ No ☐ Not sure ☐

Your action note

Choose the three most important No or Not sure answers. Record the change needed, who will handle it and the date it will be checked.

#	What needs to change?	Who?	Review date
1			

2			
3			

What your answers mean

Mostly Yes

You appear to have the main controls in place. Keep the wording, records and actual practice under review as your marketing changes.

Several No or Not sure answers

Prioritise the points involving unclear permissions, public identification, uncontrolled copies, personal devices or no process for withdrawal. These create the greatest practical difficulty when a parent raises a concern.

Need help turning the answers into action?

KoffeeKlatch provides practical GDPR support, policies and one-to-one help for children's activity providers. [Visit the KoffeeKlatch website for current services and support.](#)

A final practical note

This check-up is a starting point, not a substitute for advice about your particular circumstances. Data protection is only part of the picture: your safeguarding arrangements, contracts, school or venue rules and professional guidance may also affect whether and how images should be taken or published.

Technology and legal guidance are changing rapidly, with many further changes expected on both fronts over the next 18 months. Review your approach regularly rather than treating this as a one-off exercise.

If you would like to keep in touch, [join our mailing list for occasional updates on children's data privacy.](#)