



SINCE 604 AD

KING'S SCHOOL

ROCHESTER

WHOLE SCHOOL

TAKING, STORING AND USING IMAGES OF PUPILS

This policy was adopted on:	06.07.16
Policy Last reviewed on:	29.08.26
Person/Body reviewing:	CFW
Date of next review (except in the case of relevant legislation):	29.08.28

1. **This Policy**

- This policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by King's School Rochester ("the School"). It also covers the School's approach to using cameras and filming equipment at school events and on school premises by parents, pupils, and the media.
- It applies in addition to the School's terms and conditions and any other information the School may provide about a particular use of pupil images, including signage about the use of CCTV and more general information about the use of pupils' personal data, e.g., the School's Privacy Notices.

2. **General points to be aware of**

- Certain uses of images are necessary for the ordinary running of the School; other uses are in the legitimate interests of the School and its community and are unlikely to have a negative impact on children. The School will process such images in accordance with the UK GDPR, the Data Protection Act 2018 and other applicable data-protection requirements, and will consider any reasonable objections raised.
- We hope parents will feel able to support the School in using pupil images to celebrate pupils' achievements, promote the School's work, and for important administrative purposes such as identification and security.
- On special occasions, such as concerts, drama productions, or Speech Days, the School may use the services of an appropriately qualified/checked professional photographer to capture high-quality photographic or film images that are subsequently made available for purchase by parents.
- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should email the Data Protection Officer at **dpo@kings-rochester.co.uk**. The School will respect the wishes of parents/guardians/carers (and indeed pupils themselves) wherever reasonably possible and under this policy.
- Parents should be aware that, from around the age of 12 and upwards, the law recognises pupils' rights to have a say in how their personal information—including images—is used.

3. Use of Pupil Images for Identification and Security

- All pupils are photographed upon entering the School and, after that, at yearly intervals for internal identification purposes. These photographs identify the pupil by name, year group, house and form/tutor group. The School uses CCTV at a limited number of locations for safety, security and safeguarding purposes. Live-view cameras are currently in St Margaret's Boarding House and on the Prep School Yard. These cameras provide a live stream for authorised monitoring but do not record or retain footage. Other camera housings around the site are currently non-operational and act as visual deterrents only. Where CCTV is in operation, its use will be managed transparently and in accordance with UK data-protection law, the School's Privacy Notices and any applicable CCTV notices or policies. Access to live images is restricted to authorised staff.

4. Use of Pupil Images in School Publications

- Unless the relevant pupil or his/her parent has requested otherwise, the School will use images of its pupils to keep the School community updated on the activities of the School, and for marketing and promotional purposes, including:
 - on internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;
 - in communications with the School community (parents, pupils, staff, Governors and alumni) including by email and by post, in weekly newsletters, in event programmes and posters, in the Roffensian magazine, on the alumni website and in alumni publications, and on the School intranet;
 - on the School's website and, where appropriate, via the School's social media channels; and
 - in the School's prospectus, and in online, press and other external advertisements for the School. In such external advertising, pupils' full names will not be included without explicit consent.
- The source of these images will predominantly be the School's staff (who are subject to policies and rules in how and when to take such images), or a professional photographer/video production company used for marketing and promotional purposes, or occasionally pupils themselves. The School will only use images of pupils in suitable dress, or for certain activities, such as swimming and dance, will focus on the activity and the images will be stored securely and centrally.

5. Use of Pupil Images in the Media

- Occasionally at short notice, the media may attend an event or School activity in which School pupils are participating. The School will take all reasonable steps to ensure that any pupil whose parent or carer has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

- The media may ask for the full names of the relevant pupils to go alongside the images and these would only be provided where either parent or pupil has consented as appropriate.
- Press releases are also issued to the media containing accompanying images. These would only contain pupil's full names where permission has been obtained.

6. Security of Pupil Images

- Professional photographers and the media are accompanied at all times by a member of staff when on school premises. The School uses only reputable professional photographers and makes every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the School's instructions.
- The School takes appropriate technical and organisational security measures to ensure that images of pupils held by the School are kept securely on school systems, and protected from loss or misuse. The School will take reasonable steps to ensure that members of staff only have access to images of pupils held by the School where it is necessary for them to do so.
- All staff are given guidance on the School's Policy on Taking, Storing and Using Images of Pupils, and on the importance of ensuring that images of pupils are made and used responsibly, only for school purposes, and in accordance with school policies and the law.

7. Use of Cameras and Filming Equipment (including mobile devices) by Parents

- Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in school events, subject to the following guidelines, which the School expects all parents to follow:
 - When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the School therefore asks that it is not used at indoor events.
 - Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
 - Parents are reminded that such images are for personal use only. Images that may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example, on social media) or published in any other way.
 - Parents are reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts. The School will always print a reminder in the programme of events where issues of copyright apply.

- Parents may not film or take photographs in changing rooms or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case digital copies may be made available to parents for purchase. If the school intends to make such recordings available more widely, parents of pupils taking part in such plays and concerts will be consulted.

8. Use of Cameras and Filming Equipment by Pupils

- All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.
- The School operates a mobile-phone-free environment for pupils during the School day. Personal mobile phones must remain secured in the School-provided locking pouch in accordance with the Behaviour Management Policy and must not be used for photography, audio recording or filming during the School day except where a specific authorised exemption applies. Pupils using School-approved devices for an authorised educational activity must have the express permission of the supervising member of staff and, where another pupil or person is being photographed or recorded, their agreement must also be obtained where appropriate.
- The use of cameras, audio recording or filming equipment is not allowed in toilets, washing or changing areas. Pupils must not create, alter, share or distribute images, audio or video in a way that may humiliate, harass, impersonate, sexualise or otherwise harm another person, including through the use of generative AI, manipulated media or deepfakes.
- The misuse of images, cameras, audio recording or filming equipment in a way that breaches this policy, or the School's Anti-Bullying Policy, Data Protection Policy, IT Acceptable Use Policy, Safeguarding and Child Protection Policy, Behaviour Management Policy or School Rules is always taken seriously and may be subject to disciplinary procedures or dealt with under the relevant safeguarding procedures as appropriate.