



KINGSTON GRAMMAR SCHOOL

FOUNDED 1561

TAKING, USING & STORING IMAGES OF CHILDREN POLICY

1. This Policy

- 1.1 This policy is intended to provide guidance to staff and information to students and their parents about how images of students are normally used by the School.
- 1.2 It also covers the School's approach to the use of cameras, videos and filming equipment at school events and on school premises by parents, staff and students themselves, and the media - see Sections 8, 9 and 10 below.
- 1.3 This policy applies alongside any individual parent or student consent forms provided and the School's terms and conditions and should be understood in the context of any other information the School may provide from time to time about a particular use of student images, including eg. signage about the use of CCTV; and more general information about use of students' personal data (eg in the School's Privacy Notice).
- 1.4 Safeguarding and online safety issues are dealt with more specifically under the School's *Safeguarding and Child Protection Policy & Procedures* and *Online Safety Policy*.
- 1.5 Staff receive training on use of images in accordance with their roles and relevant school policies including the *Staff Code of Conduct*.

2. General principles

- 2.1 Certain uses of images, including student images, are necessary for the ordinary running of the School, for example for administration, identification, educational and curricular purposes and safety/security. It may not be possible to object to such uses although any concerns in this regard will be duly considered by the School.
- 2.2 Other uses are considered to be in the legitimate interests of the School and its community and unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions about how to use them, although objections may be raised and the School will seek to accommodate any reasonable objections. Examples are given in this policy at section 4.1 below.
- 2.3 We hope that parents will feel able to support the School in using student images to celebrate the achievements of students, to promote the work of the School and for important administrative purposes such as identification and security as described in this policy.
- 2.4 Parents are invited before their child starts at the School to provide their general consent for the School to use images of their child as set out in this policy. After the deadline for response, any parents who did not consent are followed up. A live list is kept of students whose images should not be used by the School for non-essential purposes.



- 2.5 Any parent who wishes to limit the use of images of a student for whom they are responsible should indicate this via the general consent form before their child starts at the School or by contacting the School in writing to enquiries@kgs.org.uk. The School will respect the wishes of parents (and indeed students themselves) wherever reasonably possible, and in accordance with this policy.
- 2.6 However, parents should be aware that certain uses of their child's images may be necessary (for example images used for administration, identification, educational and curricular purposes and safety/security) or unavoidable (eg if they are included incidentally in CCTV or as part of a photograph).
- 2.7 Parents (and students as appropriate) may also be invited to provide their specific consent from time to time if a particular use of their child's image is requested. For example, images which might be considered more intrusive or unexpected - examples of which are set out below at section 4 in this policy.
- 2.8 Parents should be aware that from around secondary school age, the law recognises students' own rights to have a say in how their personal information is used, including images.

3. Use and Publication of Certain Student Images

- 3.1 In accordance with any consents, notices or objections as may be applicable from time to time, the School will use images of its students to keep the School community updated on the activities of the School, and for marketing and promotional purposes, including but not limited to:
 - 3.1.1 Internal displays and notice boards (including moving images) in digital and in print format within the School premises.
 - 3.1.2 Printed materials such as school magazines and printed marketing material including the School's prospectus.
 - 3.1.3 Digital communications with the School community (parents, students, staff, Governors and alumni) including newsletters and bulletins.
 - 3.1.4 On the school website and, where appropriate, via the School's social media channels, eg. Instagram, Facebook and occasionally X (formerly known as Twitter).
 - 3.1.5 External advertisements for the School, including printed and/or digital marketing banners and/or other advertisements, displays at educational fairs and other marketing functions (both inside the UK and overseas) and by other means.
 - 3.1.6 Exceptionally in printed and/or digital press.
- 3.2 Images of students on digital media are not accompanied by their full names without prior permission.



4. The School's policy in respect of the above uses is as follows:

4.1 Legitimate Interests

- 4.1.1 Legitimate interests will be relied upon for any uses which are either essential (for example: for administration, identification, educational/curricular and safety/security purposes) or which fall within a scope of reasonably expected uses including: use of images on internal displays and notice boards; printed materials such as school magazines and printed marketing material including the School's prospectus; and digital communications with the School community (parents, students, staff, Governors and alumni) including newsletters and bulletins.
- 4.1.2 The key effect of the School relying on legitimate interests is that parents and students may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the School, but objections can be overridden by other factors: for example, uses which the School considers essential; or uses which create little or no risk of harm (including where children are not at risk of outside identification).

4.2 Consent

- 4.2.1 Consent will be sought for all other internal and external marketing and promotional uses of student images.
- 4.2.2 Where any intended use is considered to be particularly intrusive or unexpected (for example, on external printed banners and advertisements visible to the general public), the School will in most cases discuss the use with the student and/or parents (as appropriate) in advance and seek a specific, additional ad hoc consent.
- 4.2.3 The School will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a student or their family should be drawn to the School's attention in advance. The safeguarding and best interests of students will remain the School's priorities at all times.

5. Use of Images for Internal Identification and Security

- 5.1 All students are photographed on entering the School and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the student by name, year group, House and form/tutor group.
- 5.2 See below for images captured on the Schools' CCTV System.



6. Use of Student Images by External Media

- 6.1 Where practically possible, the School will always attempt to notify parents in advance when it expects the media to attend an event or school activity in which its students are participating and it will make every reasonable effort to ensure that children whose parents have refused permission for images of their children, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.
- 6.2 The media may ask for the names of relevant students to go alongside the images, and these will only be provided where parents have been informed about the media's visit and either parent or student has specifically consented to the publication of their name for an appropriate and necessary purpose.

7. Security and Storage of Student Images

- 7.1 Professional photographers and the media are accompanied at all times by a member of staff when on school premises. The School only uses reputable professional photographers and makes every effort to ensure that any images of students are held by them securely, responsibly and in accordance with the School's instructions.
- 7.2 The School takes appropriate technical and organisational security measures to ensure that images of students 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 students held by the School where it is necessary for them to do so. Please note that the School's existing publications, website and archived material may contain these images.
- 7.3 Any external processors of student images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.
- 7.4 All staff are given guidance on the School's policy on taking, using and storing images of children, and on the importance of ensuring that images of students are made and used responsibly, only for school purposes and in accordance with school policies and the law.
- 7.5 Students are also given age-appropriate training on their own privacy online and with their peers, including image use and social media safety.

8. Use of cameras and recording equipment by staff

- 8.1 The School likes to record events, trips and activities for use within school and for external publication. Images taken by staff must be sent to the Marketing Team via KGS systems as soon as reasonably practicable and then immediately deleted from devices.



9. Use of Cameras and Recording Equipment (including mobile phones) by Parents

9.1 Parents and close family members (hereafter parents) may take photographs (and where appropriate film) of their own children at school events or on school premises (including Ditton Field), subject to the following guidelines which the School expects all parents to follow:

- 9.1.1 Photographs/film may only be taken for personal use.
- 9.1.2 The School asks parents (and parents of other schools) not to take photographs/film of any students (other than their own child) whether incidentally, as part of a group, or on their own.
- 9.1.3 Photographs/video should therefore not be taken during performances or speeches or in any other situation where they might inadvertently include another child.
- 9.1.4 Parents should contact the School Marketing Team if they wish to request a copy of a photograph taken by the School of their child as part of a group or which may incidentally include others.
- 9.1.5 Images which inadvertently or otherwise identify other students must not be made accessible to others online (for example on Facebook, Instagram or by text or WhatsApp) or published in any other way. Parents are reminded that the publication of images may be unlawful.
- 9.1.6 The School reserves the right to refuse or withdraw permission to take photographs/film at a specific event or more generally, either for all attendees/parents (for example where a safeguarding risk to an individual child has been identified) or from any individual parent who does not follow these guidelines or is otherwise reasonably felt to be making inappropriate images.

10. Use of cameras and recording equipment by students

- 10.1 All students are encouraged to look after each other and to report any concerns about the misuse of technology or a worrying issue to a member of the pastoral staff.
- 10.2 The use of cameras or other recording equipment, including on mobile phones and other devices, is not allowed on any part of the School site including Ditton Field unless under direction of a member of staff. It is always forbidden in toilet, washing and changing areas including on school trips.
- 10.3 Students must not at any time take photos of any other persons without their express permission.
- 10.4 Photography should never be used in a manner that may offend or cause upset.
- 10.5 The misuse of images, cameras or filming equipment in a way that breaches this Policy or the Student Code of Conduct, Anti-bullying, Student IT and Mobile Phone Acceptable Use, Student Device, Online Safety, Student AI, Data Protection or



Safeguarding & Child Protection policies is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

11. CCTV

- 11.1 The School has Closed Circuit Television Cameras (CCTV) installed on its premises.
- 11.2 All fixed cameras are in plain sight on the School premises in locations that the School reasonably believes require monitoring to address the objectives set out in the CCTV Policy. There is adequate signage to inform students and others that they are entering a monitored area. No images will be captured from areas in which individuals would have a heightened expectation of privacy such as in changing and toilet facilities.
- 11.3 CCTV cameras will sometimes capture images of students. Images captured on the School's CCTV system are used in accordance with the Privacy Notice and CCTV Policy/any other information or policies concerning CCTV which may be published by the School from time to time.
- 11.4 Parents are assured that the School does not stream images collected via CCTV to any third parties or outside agencies. Please note, however, that the School may be legally required to provide CCTV footage to the Police or other law enforcement agencies if requested.

12. Treating Others with Respect

- 12.1 Everyone has a right to feel secure and to be treated with respect. Harassment and bullying will not be tolerated. The School's Anti-Bullying Policy is published. The School is strongly committed to promoting equal opportunities for all regardless of race, gender, gender orientation or physical disability.