



Kimbolton School

Taking, Storing and Using Images of Children Policy

(effective from 1 September 2022)

Introduction

1. 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 Kimbolton School ("the School"). It also covers our approach to the use of cameras and filming equipment at school events and on School premises by parents and pupils themselves, and by the media.
2. It applies in addition to our terms and conditions in our Parent Contract, and any other information we may provide about a particular use of pupil images, including:
 - our Privacy Notice;
 - signage about the use of CCTV.
3. Images of pupils in a safeguarding context are dealt with under our relevant child protection and safeguarding policies.

General points to be aware of

4. 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 unlikely to cause any negative impact on children. We are lawfully entitled to process such images and take decisions about how to use them, subject to any reasonable objections raised.
5. We are always keen to celebrate achievement publicly and to increase awareness of our school, and we know that such publicity builds children's self-esteem and pride in our school. It also allows families greater insight into their child's time with us. The images we take will be of activities that show the School and children in a positive light. We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the School; and for important administrative purposes such as identification and security.
6. Parents who accept a place for their child at Kimbolton School are invited to indicate agreement to the School using images of their son/daughter as set out in this policy, via the Image Consent Form before their child is admitted. Subsequent changes may be indicated by submitting a revised Image Consent Form at any time via the parent portal, albeit it may not be possible to delete images that have already been shared or published.
7. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example when exam boards require film evidence for public

qualifications or if they are included incidentally in CCTV, moving images or a photograph). We will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

8. Parents should be aware that the law recognises pupils' own rights to have a say in how their personal information is used – including images. Where the pupil is of sufficient maturity (generally assumed to be those at the Senior School aged 15 and above), we may seek the pupil's specific prior consent in addition to or instead of the parent's consent.

Use of Pupil Images in School Media

9. Unless the relevant pupil or their 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, online newsletters, on the school intranet and by post;
- in the School's magazines: *Kimboltonian* and *The Kim Prep Press* which are distributed to current families, staff, Governors, recent leavers and some prospective parents.
- on the school's website and, where appropriate, via the school's social media channels, eg. Facebook, Instagram, Twitter and YouTube etc;
- in the School's marketing materials, and in online, press and other external advertisements for the school; and
- third party publicity of independent schooling and its facilities, such as by independent schools' organisations, our architects and so on.

External advertising outlined in the last two categories would not normally include pupils' names. When posting images or videos online we will only use a pupil's first name, unless specific consent has been given via email or an Image Consent Form. The School may also seek specific consent before using a photograph or video recording where the School considers that the use is more privacy intrusive. Examples of this are where that pupil is a particular focus of the shot, or identified by name, but consent will not usually be sought when the child is included as part of a larger group (5 or more) or team shot.

10. 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 used for marketing and promotional purposes, or occasionally pupils. The school will only use images of

pupils in suitable dress and the images will be stored securely and centrally.

Use of Pupil Images for Identification and Security

11. All pupils are photographed on entering the school and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the pupil by their personal code only.

12. CCTV is in use on school premises and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the School's Privacy Notice and CCTV Policy.

Use of Pupil Images in the Media

13. Where practicably possible, the School will always notify parents in advance when the media is expected to attend an event or school activity in which school pupils are participating. We will make every reasonable effort to ensure that any pupil whose parent or themselves 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.

14. Similarly, we will contact parents before submitting images to the media. The media often asks for the names of the relevant pupils to go alongside the images; the first name only of children will be provided where parents have been informed about the media's visit and either parent or the pupil (those aged 15 and above at the Senior School) has consented as appropriate. We will seek specific consent before passing on the full name of a pupil.

Security of Pupil Images

15. Professional photographers and the media are accompanied at all times by a member of staff when on School premises. We use only reputable professional photographers and make every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the School's Privacy Notice. Professional photographers who attend regularly are checked through the Disclosure and Barring Service (DBS).

16. We take 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. These images will be retained for as long as they are required for the purpose for which they are taken and according to the School's internal retention policy. We 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.

17. 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.

Use of Cameras and Filming Equipment (including Mobile Phones) by Parents

18. 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 which 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 display/ print a reminder in the programme of events or in the room, where issues of copyright apply.
- Parents may not film or take photographs in any other circumstances in which photography or filming may embarrass or upset pupils.

19. 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.

20. The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

Use of Cameras and Filming Equipment by Pupils

21. 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 staff.

22. The use of cameras or filming equipment (including on mobile phones) is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset.

23. The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the School's rules and/or policies on Anti-Bullying, e-Safety, ICT and iPads Acceptable Use Policy, or the School's Child Protection and Safeguarding Policy, Data Protection Policy or Privacy Notice is always taken seriously and may be the subject of disciplinary procedures or dealt with under the

relevant Policy as appropriate.

Any queries regarding this policy should be directed to the PR & Comms Manager, Mrs Alison Ainsworth, via prcomms@kimbolton.cambs.sch.uk or the Privacy and Compliance Officer/Bursar, Mrs Jenny Agnew, via privacy@kimbolton.cambs.sch.uk.

Reviewed: June 2022