

Taking, Storing and Using Images of Children Policy

This policy covers Prep School & Senior School

Governors' Committee normally reviewing policy	Curriculum & Welfare
Date policy formally approved by Governors	November 2025
Period of review	1 Year
Last review date	August 2026
Next review date	August 2027

Person responsible for monitoring implementation and effectiveness of the policy	Deputy Head Pastoral
Other relevant policies	Pastoral Policies Acceptable Use of IT Online Safety Data Protection Staff Social Media

Kingsley School Bideford is owned and operated by KSI Schools Group Limited, which is the School's Proprietary Body ("the Proprietor").

Any reference in this policy to the Governors or Governing Body means the School's local body of governors, which operates as a local advisory board on behalf of the Proprietor. The local governing body does not constitute the Proprietary Body of the School.

The Proprietor has ultimate responsibility for ensuring that the School meets its statutory and regulatory obligations and for ensuring that this policy is appropriate, effective and implemented in accordance with those requirements.

The Governors provide local oversight and scrutiny on behalf of the Proprietor and undertake appropriate review and monitoring to satisfy themselves that this policy is being implemented effectively. They advise and make recommendations to the Proprietor and the School's leadership as appropriate.

The core principle that guides everything we do is **Putting Students First**.

1. This Policy

- This Policy is intended to provide guidance to staff and information to students and their parents, carers or guardians (referred to in this policy as "parents") about how images of students are normally used by Kingsley School ("the School"). It also covers the School's approach to the use of cameras, video and filming equipment at School events and on school premises by parents and students themselves, and the media.
- It applies alongside the School's parent contract where parents can consent or prevent the use of their child's photos for school and marketing purposes except those essential for administration, security and education.
- Safeguarding and online safety issues are more specifically dealt with under the school's relevant safeguarding and child protection and online safety policies.
- Staff are additionally subject to their own training (in accordance with their role) and school policies in this area, including under the Staff Handbook and Code of Conduct.

2. General Principles of Image Use

- 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 security. It may not be possible to object to such uses, although any concerns in this regard will be duly considered by the school.
- 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 concerns.
- We hope parents will feel able to support the school in using student images to celebrate the achievements of students, sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security.
- Parents who accept a place for their child at the school are invited to indicate that they agree to the school using images of him/her/them as set out in this policy. Parents should be aware that certain uses of their child's images may continue to be necessary, for example, administration, education, security, part of a whole-school photograph.
- Any parent who wishes to limit the use of images of a student for whom they are responsible should indicate this on the form in the joining pack. The school will respect the wishes of parents/carers (and indeed students themselves) wherever reasonably possible, and in accordance with this policy.
- Parents should be aware that, from around 12/secondary school age, the law recognises students' own rights to have a say in how their personal information is used – including images.
- Where remote video provision for students (via e.g. Teams) is necessary, the school will not retain any recordings that include children on screen without specific permission.
- Live streaming will only be used for specific events such as Speech Day and some sporting fixtures or performances. Parents will be informed in advance when live-streaming may take place.

- The school will continue to assess images against the COPINE Scale (1997), the SAP Scale (2002), and the Sexual Offences Definitive Guideline (2014). *See Appendix.*

3. Use and Publication of Certain Student Images

- In accordance with any consents, notices or objections, 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:
 - as part of the school's internal communication systems such as iSAMS, Class Dojo, Firefly, within the school community (parents, students, staff and Governors);
 - as part of school curricular activities e.g. for physical education or drama, or as a teaching aid;
 - on internal displays and notice boards within the school premises;
 - in printed material, the school's prospectus, billboards and other printed marketing material;
 - on the school's website and, where appropriate and in line with relevant policies, via the school's social media channels; and
 - in the press and other external advertisements for the school.
- The school's policy in respect of the above uses is as follows:
 - **Legitimate interests** - uses which are essential: security, administration and education.
 - 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).
 - **Consent** will be sought for all other external uses of student images online.
- 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.
- All social media and website posts involving images of students should be reviewed by a minimum of 2 members of staff before publishing. Any images taken that include students who do not have not consent for their images to be used will be deleted. When passing on materials including images for marketing purposes, staff should confirm that photo permissions have been checked.
- All images for publication must observe generally accepted standards of decency:
 - Action shots should be a celebration of the sporting activity and not a sexualised image in a sporting context.
 - Action shots must not be taken or retained where the photograph reveals a torn or displaced clothing.
 - Content with the potential to cause embarrassment or distress to the subject will be avoided.

- Extra permission will be sought from parents to use images of children wearing more revealing attire e.g. swimming costume / gymnastics leotards.
- Images will not be combined with full names unless explicit consent has been granted from those with parental responsibility for that child. Where possible images of groups will be used.
- Parents will be informed in advance if an event is likely to be live-streamed. See Appendix B for further information.

4. Use of Student Images for Identification and Security

- All students are photographed on entering the school and, thereafter, at yearly intervals, for the purposes of internal identification. These photographs identify the student by name, year group, house and form/tutor group.
- CCTV is in use on school premises and in certain cases is likely to capture images of students. Images captured on the school's CCTV system are used in accordance with the Privacy Notice and CCTV Policy and the location of cameras is clearly notified, including by signage.

5. Use of Student Images by External Media

- 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 students are participating, and will make every reasonable effort to ensure that any student whose parent or carer has refused permission for images of that student, 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 names of the relevant students to go alongside the images. It is not the School's policy to provide full names in this scenario, 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 sharing of their name, for an appropriate and necessary purpose.

6. Security of Student 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 students are in suitable dress and held by such persons securely, responsibly and in accordance with the school's instructions.
- 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.
- 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.
- All staff are given guidance on the school's policy on Taking, Storing and Using Images of Students, 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.

- Students are also given age-appropriate training on their own privacy online and with their peers, including image use and social media safety.

7. Use of Cameras and Filming Equipment (including mobile phones and wearable technology) 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 students, except incidentally as part of a group shot, without the prior agreement of that student's parents.
 - Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other students should not be made accessible to others online (for example on Facebook, Instagram or by text or WhatsApp), or published in any other way.
 - Surreptitious filming using personal devices of any sort is never permissible.
 - 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 students, by reference to their dress or activity or any other factor.
- The school reserves the right to refuse or withdraw permission to film or take photographs, at a specific event or more generally, either for all attendees/parents (e.g. 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.
- The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case physical or digital copies may be made available to parents for purchase. Parents of students taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.
- Should remote video provision at home (by Zoom, Teams or otherwise) be required or facilitated by the school in any context, specific guidelines and instructions will be provided to ensure privacy and safety, including around dress and recording of video.

8. Use of Cameras and Filming Equipment by Students

- All students 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 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 students in a manner that may offend or cause upset.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the school's Bullying Prevention Policy, Safety Policy, IT Acceptable Use Policy,

Safeguarding and Child Protection Policy is always taken seriously, and may be the subject of disciplinary procedures.

K Venner
Deputy Head Pastoral

APPENDIX A

COPINE SCALE

The COPINE Scale is a ten-level classification system used to categorise images of child sexual abuse material, developed to aid research and law enforcement in 1997. Each level represents a different category of images based on their content and the degree of sexual exploitation involved.

1. **Indicative Images:** Non-erotic images of children in everyday situations, such as family or organisation photos where children are in underwear or swimsuits.
2. **Nude or Art Images:** Images of nude or partially nude children that are not intended for sexual purposes but may be misused.
3. **Voyeuristic Images:** Covertly taken images of partially dressed children in everyday settings, often focusing on specific body areas.
4. **Posing Images:** Images where children are posed in a sexualised manner, wearing inappropriate clothing for their age.
5. **Sexual Activity:** Images depicting children engaged in sexual acts, either with other children or adults.
6. **Exploitation:** Material that involves the exploitation of children, including images that may not be genuine photographs.
7. **Sadistic Material:** Images that depict sadistic acts involving children.
8. **Other Exploitative Material:** This includes images that may not fit neatly into the previous categories but still involve exploitation.
9. **Non-Photographic Material:** This includes drawings or animations that depict child sexual abuse.
10. **Extreme Material:** The most severe category, involving the most serious forms of sexual exploitation.

SAP (Sentencing Advisory Panel) Scale (2002):

1. Nudity or erotic posing with no sexual activity.
2. Sexual activity between children, or solo masturbation by a child.
3. Non-penetrative sexual activity between adult(s) and child(ren).
4. Penetrative sexual activity between child(ren) and adult(s)
5. Sadism or bestiality.

The Sentencing Council's Sexual Offences Definitive Guideline (2014) outlines the following categories:

- **Category A:** Images involving penetrative sexual activity; images involving sexual activity with an animal or sadism.
- **Category B:** Images involving non-penetrative sexual activity.
- **Category C:** Other indecent images not falling within categories A or B.

No images used by the school fall into these categories.

APPENDIX B – LIVE STREAMING

1. Safeguarding

Filming and streaming will never compromise a child's safety, dignity, or wellbeing. Kingsley will ensure no student is shown in distress, vulnerable situations are never broadcast, and safeguarding concerns can always override the broadcast.

2. Delayed Broadcasts

Wherever possible, and ideally by default, a delayed-live feature (for example two minutes) will be implemented so that sensitive or inappropriate moments can be removed before they reach viewers.

3. Control

Kingsley will be able to stop a stream instantly and/or remove content immediately. This should be doable both pitchside or at the venue and remotely. Kingsley will also be able to decide who can access recordings.

4. Storage of the Footage

Video footage of children is likely to be personal data in this context. It should be stored securely, encrypted, and in compliant locations (the UK), not scattered across devices, hard drives, USB sticks, or unmanaged online accounts

5. Public Platforms

Advertising-driven platforms such as YouTube, Facebook or TikTok are built for mass distribution and data tracking and commercialisation – not for child protection, lawful processing of data, data management, or school governance, therefore should not be used for live-streaming.

6. Access

Live streaming by Kingsley will generally be restricted access by default with public broadcasting on an exceptional basis where there is a good justification for wider dissemination. Kingsley should be able to see who has viewed content and revoke access at any time, including on request where safeguarding or data protection concerns arise. Kingsley should be able to identify those who streamed content, and review what happened if something went wrong. Transparency protects both students and staff

7. Staff / Operators Training

Anyone filming or streaming in a school environment should be DBS-checked and trained in safeguarding and digital responsibility.

8. Suppliers / Platforms / Devices

Kingsley will not adopt platforms, cameras, or services that prioritise automation, AI, data capture, or commercial exploitation over child protection, lawful processing, and school control. Kingsley will retain ownership of their video content and data and must not agree to terms that put the above at material risk.

9. Regular Review

The Deputy Head Pastoral and Data Protection Manager will review (at least annually) any KCSiE or data protection law updates to ensure that safeguarding remains effective and streaming activity remains compliant as technology and usage evolve.