



# King's College

DOHA

## Photography and Film Policy

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## **1. Introduction**

This Policy is intended to provide information to King's College Doha pupils and their parents, carers or guardians (referred to in this policy as "parents"), and members of the public about how images are normally used by King's College Doha (hereafter referred to as "School"), including Early Years Foundation Stage (EYFS).

It predominantly covers King's College Doha's use of pupil images, but also applies to our use of cameras and filming equipment, and images of staff, alumni and visitors attending King's College Doha-run events and activities. The use of cameras and filming equipment by parents and pupils themselves, and the media, are also covered.

It applies in addition to King's College Doha's other agreements in place with parents and any other information King's College Doha may provide about our use of images and personal data in general, for example, our Privacy Notices. Images of pupils in a safeguarding context are dealt with under the King's College Doha's relevant safeguarding policies.

## **2. Why do we store and process images?**

Certain uses of images are necessary for the ordinary running of King's College Doha; other uses are in the legitimate interests of King's College Doha and its community and are unlikely to cause any negative impact on individuals. King's College Doha is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

In addition, our use of images may sometimes rely on consent (for example, Marketing and Publicity). Parents who accept a place for their child at King's College Doha are invited to opt out of King's College Doha using images of him/her as set out in this policy by completing the relevant no consent form. However, parents should be aware that certain uses of their child's images may be necessary or unavoidable (for example, our use of CCTV for security purposes and identification of pupils for internal administrative purposes).

Any parent (or pupil over the age of 13) who wishes to limit the use of images of a pupil for whom they are responsible can withdraw their consent and request that the details and any images of the pupil are removed from King's College Doha systems at any time. In addition, any individual (including visitors to King's College Doha) may object to King's College Doha's use of their image, as detailed within the Section on Marketing and Publicity.

### **2a. Exam Requirements and Performance Analysis**

As a necessary part of supporting our academic sport activity, sports fixtures and training sessions may be recorded. This material will either be required as examination evidence (for example, submission to an external exam board in line with the board's policies and procedures) or for in-class performance analysis purposes. Visiting pupils from other schools, academies or King's College Doha taking part in fixtures may be incidentally recorded, but at no stage will they or visiting members of staff be named.

### **2b. Identification and Security**

All pupils are photographed on entering King's College Doha and, thereafter, at intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.

CCTV is in use on King's College Doha premises, and will sometimes capture images of pupils, parents, staff and visitors to King's College Doha. Images captured on King's College Doha's CCTV system are used in accordance with King's College Doha's CCTV Policy.

### **2c. Formal Individual and Group Photography**

Formal individual and group photographs (of year groups, houses, the full school and/or teams) will be taken annually of all pupils and are made available for pupils and their families to purchase via a secure, restricted site. Forenames and surnames will be attached to these formal, official images. They will only be reproduced externally (as detailed in the Section on Marketing and Publicity) if all participants consent to its reproduction.

## **2d. Marketing and Publicity (by King's College Doha)**

### ***Images of Pupils***

Photographs and video footage (live or recorded) may showcase a specific pupil's achievement or award; the past week's or fortnight's events and activities; or a specific event, including sports matches, plays, musical performances, and other King's College Doha events, visiting seminars and exhibits. We hope parents will feel able to support King's College Doha in using pupil images to celebrate pupils' sporting and academic achievements, and to promote the work of King's College Doha.

Where we rely on consent in order to share images of pupils, images featuring pupils without consent who cannot be reasonably identified (i.e. if they are in the distant background or not facing the camera) may still be posted.

| Use:                                                                                                                                                                                                 | Names included:                                                                                 | Grounds for Processing:                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------|
| Displayed internally on digital and conventional notice boards within King's College Doha premises.                                                                                                  | Forename; Surname                                                                               | Legitimate Interests                              |
| Attached to internal communications in order to share our activities privately with the King's College Doha community (parents, pupils, staff and alumni), including email and by post.              | Forename; Surname                                                                               | Legitimate Interests                              |
| Published in printed publications exclusively available to pupils and their families (e.g. Leavers Books).                                                                                           | Forename; Surname                                                                               | Consent (Parental or, if aged 13 or older, Pupil) |
| Published within retrospective <b>annual</b> printed material such as King's Connect, The Year. Please note that printed material is also available online.                                          | Forename; Surname                                                                               | Consent (Parental or, if aged 13 or older, Pupil) |
| Published within retrospective <b>regular</b> printed material such as King's Connect Please note that printed material is also available online.                                                    | Forename only; And the first letter of the surname if more than one pupil has the same forename | Consent (Parental or, if aged 13 or older, Pupil) |
| Published on King's College Doha's website, and where appropriate, via King's College Doha's social media channels. These include, but are not limited to, Twitter, Facebook, Instagram and YouTube. | Forename only; And the first letter of the surname if more than one pupil has the same forename | Consent (Parental or, if aged 13 or older, Pupil) |
| Promotional images of King's College Doha including pupils used for Marketing purposes published in print, on our website and social media channels.                                                 | None                                                                                            | Consent (Parental or, if aged 13 or older, Pupil) |

### ***Images of Staff***

It is expected that images of staff, in connection with their employment or engagement at King's College

Doha, will be published for marketing and promotional purposes (as detailed within our Privacy Notice for Staff).

### ***Images of Visitors to King's College Doha***

The King's College Doha reserves the right to use cameras and filming equipment at King's College Doha run events. Images (without names) taken at these events may be used for press purposes or to promote similar future events.

Attendees may request to be positioned out of shot or receive confirmation that any images, featuring themselves, are not to be used by the King's College Doha. Any visitor who wishes to object to the King's College Doha's use of their image should email the event organiser.

## **2e. Marketing and Publicity (by Third Party Organisations)**

### ***Images taken by Third Parties***

Third party organisations may include:

- Schools, Academies, King's College Doha and Universities
- Media organisations (including News Outlets)
- Organisations beyond the Education Sector hosting events or trips attended by King's College Doha pupils (for example, a pupil may participate in a concert to raise money for a charity)

Parents should be aware that other organisations may take photos of our pupils; for example, during a Sports fixture photographs may be taken of the match.

Every reasonable effort will be taken to ensure that third parties are aware that, should they wish to publish images of a specific pupil, they must either ask permission from the pupil and their parents directly or request that King's College Doha staff do the same on their behalf.

### ***Images requested for use by Third Parties***

Images (taken by King's College Doha, including images with accompanying names) will only be released to another organisation after additional consent has been given by the pupil and/or their parents or guardian.

## **2f. Archiving in the 'Public Interest'**

Images may be retained permanently by King's College Doha for the following purposes:

- Enabling research and investigation, including academic, historical or genealogical research;
- Enabling the discovery and availability of personal, community and corporate identity, memory and history;
- Enabling educational use; and
- Enabling commercial and non-commercial re-use.

Images retained in the 'Public Interest' will only be processed in line with Data Protection legislation, which necessarily entails access restrictions.

## **3. Retention**

King's College Doha is committed to storing and processing images only for as long as is required by a specific King's College Doha process or where there is compelling legitimate case for storing and processing that data. All images are retained in line with our Retention Guidelines.

## **4. Security**

All staff are given guidance on King's College Doha's Policy related to taking, storing and using images of pupils, and on the importance of ensuring that images of pupils are made and used responsibly, only for

King's College Doha purposes, and in accordance with King's College Doha's policies and the law.

External professional photographers and the media are accompanied at all times by a member of staff when on King's College Doha premises. King's College Doha 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 King's College Doha's instructions.

King's College Doha takes appropriate technical and organisational security measures to ensure that images of pupils held by King's College Doha are kept securely and protected from loss or misuse. King's College Doha will take reasonable steps to ensure that members of staff only have access to images of pupils held by King's College Doha where it is necessary for them to do so.

## **5. Use of Cameras and Filming Equipment by Parents and Pupils**

### **5a. 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 King's College Doha events, subject to the following guidelines, which King's College Doha 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.
- In particular, flash photography can disturb others in the audience, or even cause distress for those with medical conditions; King's College Doha 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 identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way.
- Parents are reminded that copyright issues may prevent King's College Doha from permitting the filming or recording of some plays and concerts. King's College Doha will always make parents aware where issues of copyright apply.
- Parents may not film or take photographs in changing rooms or backstage during King's College Doha productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- King's College Doha 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 taking inappropriate images.
- King's College Doha may sometimes record plays and concerts professionally (or engage a professional photographer or film company to do so), in which case CD, DVD or digital copies of the DVDs and CDs may be made available to parents for purchase. These copies will only feature visual footage of pupils that have consented to their image being used. They will not identify pupils by name unless prior consent has been given.
- If a member of staff spots any suspicious behaviour (someone using a camera with a long lens and tracking a child that is not their own, for instance) should report this immediately to the person in charge of the event who will politely challenge them.

### **5b. By Pupils**

All pupils are expected to sign and comply with the ICT Pupil Acceptable Use Policy Agreement, which covers the use of cameras and filming equipment (including mobile phones), and any distribution of images. 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.

### **5c. By Staff**

Personal cameras or phones should not be used at all. This is clearly outlined in the Safeguarding Policy also. The school has its own on-site photographer who should be used first and foremost, especially at high profile school events. The school also has its own batch of cameras for photography clubs and trips out of school. These, rather than personal cameras, should be used and all photos given to the school photographer to load onto the network for use in marketing and publicity.

Photographic evidence is relied upon heavily in Pre-Prep, particularly in Foundation Stage, as a way of recording a child meeting a developmental milestone or achieving a learning goal. If parents of Pre-Prep pupils have indicated that they do not want their child photographed for the school's use, it is worth checking if they mind if the teacher only takes their photograph for the reason outlined above. The parent should be reassured that these photos would only be glued into books as a record of learning or shared with the parent at the end of the school year and not kept electronically afterwards.

The misuse of images, cameras or filming equipment in a way that breaches this policy, or any of King's College Doha's other policies is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

#### **6. Your right to access, rectify, restrict or erase personal data**

In line with current Data Protection legislation, pupils, parents, staff and visitors to King's College Doha may request access to, rectification, restriction or erasure of their personal data. For more information regarding your rights, please refer to our Privacy Notices (available online) or email [dataprotection@kingscollegedoha.com](mailto:dataprotection@kingscollegedoha.com).

#### **Policy History**

|                                     |                        |
|-------------------------------------|------------------------|
| Date of adoption of this policy     | September 2023         |
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| Policy owner (SMT)                  | Deputy Head (Pastoral) |
| Policy owner (Board)                | Chair                  |