Photography, Filming and Recording Policy

Guiding Statements

Physical Environment
To provide a safe and secure learning and working environment that meets the needs of all students and staff, and is conducive to high quality learning.

Purpose

The School is committed to providing an environment in which students, staff, parents, guardians and visitors feel safe, respected and able to participate without concern that they may be photographed, filmed or recorded without their knowledge or permission.

This policy establishes expectations concerning the creation, use, storage and sharing of photographs, video recordings and audio recordings at school and during school-related activities.

The policy is intended to:

- protect the privacy, dignity and safety of members of the School community
- support an environment in which teaching, learning and professional conversations can take place openly
- prevent unauthorised or covert recording
- clarify the difference between permission to record and permission to share
- provide appropriate processes for legitimate educational, operational and personal recording
- address emerging recording technologies, including smart glasses and other wearable devices

Scope

This policy applies to:

- all students
- parents and guardians
- visitors, volunteers, contractors and guests
- photography, video recording and audio recording
- live streaming, screen recording and the capture or transcription of conversations
- school grounds, buildings, classrooms, offices, corridors, common areas, sporting fields and other School facilities
- excursions, camps, competitions, performances, sporting events and other School activities held away from the School campus
- online lessons, video conferences and meetings conducted through School systems
- recordings made using personal or School-owned devices

This policy should be read alongside the School's policies concerning student conduct, acceptable use of technology, safeguarding, data protection, social media and privacy.

Definitions

For the purposes of this policy:

Recording means creating or attempting to create a photograph, video, audio recording, live stream, screen recording, digital transcription or any other reproducible record of a person, activity, conversation or location.

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Device includes a mobile phone, tablet, laptop, camera, video camera, voice recorder, smartwatch, smart glasses, body-worn camera, wearable device, drone or any other similar equipment capable of capturing images, video or sound.

Sharing includes showing, sending, copying, forwarding, uploading, posting, publishing, live streaming or otherwise making a recording available to another person. Sharing with one individual is still considered sharing.

Consent means clear and informed permission given for a specified purpose. Consent to be recorded does not automatically include consent for the recording to be shared or published.

School-authorised recording means recording approved by an appropriate member of staff for a legitimate educational, operational, communications, safeguarding or School-related purpose.

Covert recording means recording a person or conversation without the knowledge of the person or people being recorded.

General Principle

Students must not photograph, film or audio-record another person at school or during a School activity without permission.

This applies whether the recording is:
- deliberate or incidental
- made openly or covertly
- retained on the device or automatically uploaded to cloud storage
- intended for personal use or intended to be shared
- made in a classroom, office, sporting area, common area or any other School location

No person should assume that another student, staff member, parent, guardian or visitor is comfortable being recorded.

Recording in Classrooms and Learning Activities

Students must not photograph, film or audio-record:
- a lesson
- a teacher or other member of staff
- another student
- a classroom discussion
- a presentation, performance or assessment
- information displayed on a board or screen
- learning materials or assessment materials

unless the recording has been expressly authorised by the teacher or another appropriate member of staff.

A teacher may approve recording for a legitimate educational purpose, including:
- completing an assigned project
- recording a performance or presentation
- reviewing practical work
- supporting an approved learning need or reasonable adjustment
- documenting an experiment or activity
- creating authorised School communications

The teacher may impose conditions concerning:
- what may be recorded
- who may appear in the recording
- which device may be used

- where the recording may be stored
- who may view it
- when it must be deleted
- whether it may be shared

A student must stop recording immediately when instructed to do so.
Permission given for one activity, lesson or occasion does not provide ongoing permission to record at another time.

Recording Around the School

Students must not photograph, film or audio-record people without permission in:
- corridors and stairwells
- libraries and study areas
- dining areas
- sporting fields and courts
- playgrounds and recreational areas
- assemblies and chapels
- offices and reception areas
- buses and other School transport
- changing rooms, toilets, health facilities or other private areas
- any other part of the School or venue being used for a School activity

Recording in toilets, changing rooms, showers, health facilities or any location in which a person has a heightened expectation of privacy is strictly prohibited.

Students must also not record an accident, medical incident, conflict, disciplinary matter, distressed person, unsafe behaviour or other sensitive incident. Students should move away, seek assistance from a member of staff and avoid interfering with the response to the incident.

Smart Glasses and Wearable Recording Devices

Students must not wear or use smart glasses or any other wearable device equipped with a camera or microphone while at school or participating in a School activity.

This restriction applies regardless of whether:
- the recording function is activated
- the student states that the device is not recording
- an indicator light is visible
- the camera or microphone has been disabled through software
- the device is being worn for fashion, convenience or another non-recording purpose

The presence of such a device may create reasonable uncertainty or concern about whether recording is taking place. For this reason, camera-enabled or microphone-enabled wearable devices must not be worn at school unless the School has granted a specific exemption.

An exemption may be approved for a documented medical, accessibility or educational reason. The School may impose conditions on any approved use.

Ordinary prescription glasses and hearing or accessibility devices that do not contain recording capabilities are not affected by this provision.

Incidental or Unintentional Recording

A person may unintentionally appear or be heard in the background of an otherwise authorised or legitimate recording.

Students must take reasonable care to:
- frame recordings so that people who have not consented are excluded

- avoid recording private conversations in the background
- check recordings before sharing them
- crop, edit, blur or mute material where necessary
- refrain from sharing a recording where a person objects to appearing in it

Where a student, staff member or other person reasonably objects to appearing or being heard in a recording, the recording must not be shared in its existing form.

Where it has already been posted or shared, the person responsible must promptly:
- remove the post or recording
- delete it from shared spaces under their control
- ask recipients to delete it
- cooperate with any further directions given by the School

An unintentional recording does not become acceptable merely because the person recording did not notice who or what had been captured.

Permission to Record and Permission to Share

Permission to make a recording does not include permission to share it.

Separate permission must be obtained before a recording is:
- shown to another student or person
- sent through email or messaging services
- placed in a group chat
- uploaded to shared storage
- posted on social media
- published on a website
- submitted to an external organisation
- live streamed
- used for promotional, commercial or public purposes

Permission to share must relate to the proposed audience and purpose. Permission to show a recording to a teacher for an assignment, for example, does not permit the recording to be posted online.

A person who originally consented may also object to a proposed use or wider distribution of the recording.

Students must comply with any request from the School to remove, delete or stop sharing a recording.

School-Authorised Photography and Recording

The School may arrange photography, filming or audio recording for legitimate purposes, including:
- teaching and learning
- assessment
- performances and productions
- sporting and co-curricular activities
- record keeping
- student identification
- School publications
- communications and promotion
- professional learning
- safety, security and safeguarding
- photo booths at special events

School-authorised recording will be conducted in accordance with applicable School consent processes, privacy obligations and data-protection requirements.

Where practical, School-owned or School-approved equipment and accounts should be used for official School recording.

Students must follow staff instructions concerning where they may stand, what they may record and whether personal devices may be used during events.

Performances, Sporting Events and School Functions

The School permits parents, guardians or students to take photographs or recordings for student performances, sporting events, inter-House and large events such as International Day.

Any permission is subject to the following conditions:
- recording must not disrupt the event
- recording must be for the approved purpose
- individuals must not be singled out for recording where they or the School have objected
- sensitive, embarrassing or inappropriate material must not be captured or shared
- recordings must not be used commercially without authorisation
- any instructions given by the School or event organiser must be followed

The School may prohibit or limit personal recording at an event where privacy, safeguarding, copyright, performance rights, venue requirements or operational considerations make this necessary.

Recording Meetings and Conversations

Students, parents, guardians and visitors must not make an audio recording, video recording, screen recording, automated transcription or other record of a meeting or conversation without the knowledge and consent of everyone participating. This includes meetings held in-person, on the phone or online through platforms such as Zoom.

A person who wishes to record a meeting must:
1. inform the School before the meeting wherever possible
2. obtain the agreement of all participants before recording begins

Every participant has the right to decline to be recorded.
A meeting must not be recorded where any participant does not consent, unless the School determines that recording is required or otherwise authorised for a legitimate legal, safeguarding or operational purpose.

A parent or guardian who considers recording to be a condition of attending should notify the School sufficiently in advance. This allows the School to consult the proposed participants, consider alternatives and avoid convening a meeting that cannot proceed as anticipated.

Where a participant does not consent, possible alternatives may include:
- an agreed written record of the meeting
- formal meeting minutes
- attendance by a support person
- an exchange of written questions and responses
- a written summary provided after the meeting
- another reasonable arrangement approved by the School

Consent to record a meeting does not include permission to publish, post or distribute the recording. Any proposed sharing requires separate agreement.
The use of artificial intelligence tools, transcription services, virtual meeting assistants or applications that capture, process or retain the content of a meeting is considered recording and must be disclosed.

Covert or Unauthorised Recording

Covert or unauthorised recording is a serious breach of this policy.

A student must not conceal a device, disguise its use, activate recording remotely or take any other action intended to record a person without their knowledge.

Where the School becomes aware of an unauthorised recording, it may direct the student or other person to:

- stop recording
- surrender or secure the device in accordance with School procedures
- show the recording to an authorised member of staff
- preserve the original recording
- delete copies where directed
- identify recipients or online locations to which it has been sent
- assist with its removal
- refrain from further use or disclosure

The School will respond proportionately, taking account of the circumstances, purpose, content, impact and any safeguarding considerations. Consequences of such action may include the termination of enrolment contracts.

Recordings as Evidence

The fact that a recording was made without permission does not automatically determine whether the School will consider it during an investigation.

The School may, at its discretion:

- view or listen to an unauthorised recording
- decline to consider it
- retain a copy
- use it as part of a safeguarding, disciplinary, complaints or other investigation
- provide it to an appropriate authority where required or justified
- take action concerning both the content of the recording and the manner in which it was obtained

The School's decision will take account of:

- the seriousness of the matter
- the reliability and completeness of the recording
- whether it has been edited or taken out of context
- the privacy and safety of those recorded
- applicable legal and safeguarding obligations
- fairness to all people involved

Consideration of a recording as evidence does not make the unauthorised act of recording acceptable and does not prevent separate disciplinary action.

Students must not create, encourage or distribute covert recordings for the purpose of provoking, humiliating, threatening, intimidating or entrapping another person.

Altered and Artificially Generated Content

Students must not use recordings made at school to create or distribute:

- misleading edits
- impersonations
- fabricated conversations
- manipulated images or video
- synthetic or cloned voices
- deepfakes
- memes or other content intended to embarrass, ridicule, harass or misrepresent a person

Content that has been altered as a joke may still cause significant harm and may be addressed under this policy and other relevant School policies.

Storage, Security and Deletion

Any person authorised to make a recording must protect it from unauthorised access, alteration or distribution.

Recordings must not be:
- stored in an insecure or publicly accessible location
- uploaded automatically to an unauthorised cloud service
- retained for longer than needed for the approved purpose
- copied onto another device without permission
- used for a purpose different from the one originally approved

Where a member of staff directs a student to delete a recording, the student must delete the recording and any copies within the student's control, including copies held in recently deleted folders, shared albums, messaging services or cloud storage, subject to any direction to preserve it for an investigation. A person must not delete, alter or conceal a recording after being instructed by the School to preserve it.

Reporting Concerns

Any student who believes that they have been recorded or that a recording of them has been shared without permission should report the matter promptly to a teacher, Head of House, safeguarding team member or another trusted member of staff.

Reports should include, where known:
- who made or shared the recording
- when and where it was created
- where it was posted or sent
- who may have received it
- any screenshots, links or other available information

Students should not respond by further distributing the material.
The School will take reasonable steps to assess the concern, safeguard affected individuals, preserve relevant evidence and seek removal of unauthorised material.

Breaches of the Policy

A breach of this policy may result in action under the School's student conduct or disciplinary procedures.

The School may consider:
- whether the recording was deliberate
- whether permission was sought
- the location and circumstances
- whether the recording involved a private or sensitive situation
- whether it was shared or published
- the size of the audience
- whether it was used to bully, harass, threaten, deceive or humiliate
- whether the student cooperated in removing it
- whether it has caused actual or potential harm
- whether there have been previous breaches

Possible responses may include education and guidance, removal of device privileges, confiscation in accordance with School procedures, restorative action, removal of content, parental contact and formal disciplinary consequences.

Serious matters may be referred to external authorities where appropriate.

Exceptions

Nothing in this policy prevents:
- approved School photography or recording
- authorised CCTV, access-control or security systems
- recording required for safeguarding, safety, legal or regulatory purposes
- reasonable adjustments approved by the School
- emergency recordings made by or at the direction of authorised personnel
- recording expressly required or permitted by law

Any exception should be limited to the purpose for which it is authorised.

Responsibilities

Students are responsible for seeking permission, respecting refusals, protecting recordings and complying with directions to stop, delete, preserve or remove material.

Parents and guardians are expected to support this policy, disclose any intention to record a meeting and avoid sharing School-related recordings in a manner that infringes the privacy or dignity of others.

Staff are responsible for setting clear expectations, authorising recording only where appropriate, responding to concerns and following School procedures for official recordings.

The School is responsible for maintaining appropriate consent, privacy, safeguarding and data-handling arrangements and for reviewing this policy as technologies and risks develop.