



RTA Kids

Photography, Filming & Media Policy

Organisation: Rom Theatre Arts Kids (RTA Kids)

Applies to: All students aged 2–18, parents/carers, staff, tutors, volunteers, chaperones, contractors, photographers, videographers and visitors

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Policy version: 2026–2027

Date reviewed: August 2026

Next review: August 2027, or sooner where legislation, guidance or RTA Kids' activities change.

1. Purpose of this Policy

RTA Kids regularly photographs and films students during classes, rehearsals, workshops, performances, competitions, events and other activities.

We recognise that photographs and video recordings of children can constitute **personal data** and that images of children must be handled responsibly, respectfully and in accordance with safeguarding and data protection requirements.

The purpose of this policy is to ensure that:

- Children are protected when photographs or recordings are taken.
- Images are taken only for legitimate and identified purposes.
- Appropriate consent or another lawful basis is established where required.
- Children and parents/carers understand how images may be used.
- Staff understand their responsibilities when taking or handling images.
- Images are stored securely.
- Images are not used in ways that could place a child at risk.
- Parents/carers can understand and manage their preferences regarding promotional photography.
- RTA Kids maintains appropriate professional boundaries when photographing and filming children.

This policy forms part of RTA Kids' wider **Child Protection & Safeguarding Policy**.

2. Safeguarding Principle

The safety and welfare of the child always takes priority over photography, filming, publicity or promotional requirements.

RTA Kids will never allow the desire to obtain promotional material to override a child's safeguarding, dignity or privacy.

Staff should always ask:

“Is taking or using this image necessary, appropriate and in the child's best interests?”

If the answer is unclear, the image should not be taken or used until the matter has been discussed with the DSL.

3. Who This Policy Applies To

This policy applies to:

- RTA Kids directors and management.
- Employees.
- Tutors and teaching staff.
- Freelance practitioners.
- Volunteers.
- Chaperones.
- Photographers.
- Videographers.
- Marketing personnel.
- Contractors.
- Visiting professionals.
- Parents/carers where they are photographing or filming RTA Kids activities.
- Any other adult authorised to take photographs or recordings at RTA Kids activities.

4. Types of Photography and Filming

RTA Kids may take photographs and/or recordings for a number of legitimate purposes, including:

A. Teaching and educational purposes

Images may be used to:

- Record choreography or rehearsal material.
- Support teaching and learning.
- Provide feedback.
- Document productions.
- Assist with rehearsal or performance planning.

These images should only be accessible to those who need them for the relevant purpose.

B. Internal records

Images may be used to:

- Record productions and events.
- Maintain internal records.
- Document RTA Kids activities.
- Support organisational administration.

C. Promotional purposes

With the appropriate consent arrangements, images may be used for:

- RTA Kids' website.
- Social media.
- Posters.
- Flyers.
- Brochures.
- Advertising.
- Digital marketing.
- Promotional videos.
- Newsletters.
- Press coverage.
- Future RTA Kids publicity.

D. Performance photography and filming

RTA Kids may arrange professional photography or filming of:

- Shows.
- Concerts.
- Performances.
- Competitions.
- Rehearsals.
- Workshops.
- Special events.

Parents/carers will be informed where professional filming or photography is being undertaken and how the resulting material may be used.

5. Consent for Promotional Photography

RTA Kids will operate a **separate Photography, Filming & Media Consent Form** for students.

Parents/carers will be asked to indicate whether they consent to their child's identifiable image or recording being used for promotional purposes.

Consent should be:

- Informed.
- Specific.
- Freely given.
- Clearly recorded.
- Capable of being withdrawn.

The ICO advises that consent is one possible lawful basis for using photographs but that organisations must consider the appropriate lawful basis for the particular processing and explain this clearly to individuals.

RTA Kids will therefore not rely solely on a general statement within the enrolment terms that photographs “may be used”.

6. Children Who Do Not Have Promotional Consent

Where a parent/carer has not provided promotional consent, RTA Kids will take reasonable steps to avoid using that child's identifiable image in promotional material.

This may include:

- Positioning the child appropriately during group photographs.
- Asking the child to stand outside a promotional photograph.
- Cropping images where appropriate.
- Blurring an identifiable child where technically appropriate.
- Selecting alternative photographs.

However, RTA Kids cannot guarantee that a child will never appear incidentally in a photograph taken at a public performance or event by an independent member of the audience.

RTA Kids will take reasonable steps to communicate photography arrangements to audiences and professional photographers and will act promptly if a safeguarding concern is raised.

7. Withdrawal of Consent

Parents/carers may withdraw promotional photography consent at any time by contacting:

hello@rtakids.co.uk

Withdrawal of consent will apply to **future use** of images.

Parents should understand that withdrawal cannot necessarily:

- Remove material that has already been printed.
- Recall printed programmes or promotional materials already distributed.
- Remove content that has already been published by third parties.
- Undo previous lawful processing.

Where an image is held digitally by RTA Kids and is no longer required for another lawful purpose, RTA Kids will take reasonable steps to stop using it for the relevant promotional purpose following withdrawal.

The ICO describes consent as involving the ability to change one's mind about continued processing.

8. Photography at Performances and Public Events

RTA Kids recognises that performances can involve parents, relatives and members of the public taking photographs and videos.

Where appropriate, RTA Kids will:

- Inform audiences about photography and filming arrangements.
- Display appropriate notices.
- Provide instructions where photography is restricted.
- Consider safeguarding concerns raised by parents/carers.
- Restrict photography backstage or in changing areas.
- Ensure professional photographers and videographers understand RTA Kids' safeguarding expectations.

Where a venue has its own photography or filming policy, RTA Kids will comply with that policy.

9. Professional Photographers and Videographers

Any photographer or videographer commissioned by RTA Kids to work with children must be appropriately briefed before the activity.

Where appropriate, RTA Kids will undertake relevant checks and safeguarding due diligence based on the person's role and level of contact with children.

Professional photographers and videographers must:

- Follow RTA Kids' safeguarding procedures.
- Follow instructions from the DSL or event lead.
- Remain within authorised areas.
- Avoid unnecessary one-to-one contact with children.
- Not ask children to pose in inappropriate ways.
- Not request personal contact details or social media information from students.
- Not communicate privately with students.
- Not share images independently through their personal social media.
- Store images securely.
- Only use images for the purpose agreed with RTA Kids.

10. Appropriate Images

RTA Kids will only use images that are appropriate to the context in which they were taken.

Images should:

- Show children appropriately dressed.
- Reflect the activity being undertaken.
- Maintain the child's dignity.
- Avoid unnecessary close-ups where inappropriate.
- Avoid images that could embarrass or humiliate a child.
- Never be sexualised.
- Never portray children in vulnerable or compromising situations.

Particular care must be taken with images involving:

- Changing rooms.
- Costumes.
- Dancewear.
- Swimming or similar activities.
- Medical situations.
- Injuries.
- Toileting.
- Personal care.
- Emotional distress.

11. Changing Rooms, Toilets & Private Areas

Photography and filming are strictly prohibited in:

- Toilets.
- Changing rooms.
- Dressing rooms.
- Private backstage changing areas.
- Any area where children may reasonably expect privacy.

Staff, photographers, videographers and visitors must not use cameras or mobile phones in these areas.

Where children are changing for performances, RTA Kids will ensure appropriate safeguarding arrangements are in place.

12. Staff and Tutor Use of Personal Devices

Staff and tutors should **not routinely photograph or film children using personal mobile phones or personal devices**. All photography and filming must be carried out using the designated RTA Kids work phones. If, in exceptional circumstances, any photograph or video is taken on a faculty member's personal phone, it must be sent immediately to the RTA Kids work phone and then permanently deleted from the personal device. This is to comply with GDPR and Safeguarding.

Where photography is specifically authorised for an RTA Kids purpose, staff must follow RTA Kids' instructions regarding:

- What may be photographed.
- Why it is being photographed.
- Where the material is stored.
- Who can access it.
- When it must be deleted or transferred.

Images must not remain unnecessarily on personal devices.

Staff must never:

- Upload student images to personal social media.
- Send student images to friends or family.
- Store student images in personal cloud storage.
- Use student images for personal portfolios without written authorisation.
- Share images through personal WhatsApp conversations.
- Give images to students through personal accounts.

13. WhatsApp and Messaging

Student photographs must not be circulated through informal staff WhatsApp groups unless this has been specifically authorised and is necessary for an RTA Kids purpose.

Where an image needs to be shared for operational reasons, RTA Kids will use an appropriate organisational communication method.

Staff must never use photographs as a reason to initiate inappropriate private communication with a student.

14. Social Media

RTA Kids may use photographs and videos on its official social media channels where the relevant consent and lawful basis requirements have been satisfied.

Official RTA Kids social media accounts are managed by authorised individuals.

Staff and tutors must not:

- Post RTA Kids student images on personal accounts.
- Tag students in personal posts.
- Add students to personal social media accounts.
- Direct message students using personal social media accounts.
- Encourage students to send photographs privately.
- Share behind-the-scenes content involving children without authorisation.

15. Names and Personal Information

Where children appear in RTA Kids promotional material, RTA Kids will generally avoid publishing:

- Full names.
- Dates of birth.
- Home addresses.
- School names.
- Personal contact details.
- Personal social media usernames.
- Other information that could unnecessarily identify or locate the child.

Where appropriate, RTA Kids may use:

- First names.
- First name and age group.
- Class or production information.

Additional caution will be applied where identifying information could create a safeguarding risk.

16. Children at Particular Safeguarding Risk

RTA Kids recognises that some children may require additional restrictions around photography and filming.

This may include children:

- Subject to safeguarding plans.
- In care or previously in care.
- At risk of exploitation.
- Subject to domestic abuse concerns.
- Subject to parental disputes or court proceedings.
- With a known risk associated with being located or identified.
- Whose whereabouts are confidential.
- Where social care or police have advised that images should not be used.

Where RTA Kids is informed of a specific safeguarding restriction, the DSL will ensure the relevant information is recorded securely and communicated only to staff who need to know.

17. Court Orders and Safeguarding Restrictions

Parents/carers should inform RTA Kids immediately if there are relevant:

- Court orders.
- Child protection arrangements.
- Restrictions concerning photographs.

- Restrictions concerning contact.
- Police or social care instructions.

RTA Kids may request appropriate evidence where necessary to understand and implement a safeguarding restriction.

The welfare and safety of the child will remain the primary consideration.

18. Children Performing in Shows

RTA Kids frequently works with children in theatrical productions.

Where children participate in performances, RTA Kids may use photographs and recordings to promote:

- The production.
- Future productions.
- RTA Kids.
- The achievements of students.
- Future classes and workshops.

Where productions involve children performing under applicable child performance legislation, licensing or **Body of Persons Approval (BOPA)** arrangements, RTA Kids will comply with the relevant safeguarding and performance requirements. Essex County Council requires a Child Protection Policy and risk assessment as part of a BOPA application.

19. External Press and Media

Where RTA Kids invites or permits press photographers, journalists, television crews or other external media to attend an event involving children, the organisation must be appropriately briefed.

Where necessary, RTA Kids will:

- Confirm the purpose of the visit.
- Establish who will be attending.
- Confirm photography/filming arrangements.
- Provide safeguarding instructions.
- Ensure appropriate consent arrangements are in place.
- Restrict access to areas where children may be changing or have a reasonable expectation of privacy.

External media must not independently approach students for interviews, contact details or social media information without appropriate authorisation.

20. Images Supplied by Parents

Parents/carers may occasionally provide RTA Kids with photographs or videos.

RTA Kids will only use such material for an identified purpose and with appropriate permission.

Parents/carers must not send inappropriate or unnecessary images of children to staff.

Staff should not request photographs from children directly.

21. Photography by Parents and Visitors

Parents and visitors may be permitted to take photographs at certain RTA Kids events.

However:

- Photography may be restricted by RTA Kids or the venue.
- Photography is not permitted in changing rooms or toilets.
- Parents should not photograph other children without appropriate consideration of their privacy and the wishes of their parents/carers.
- Parents must not post images of other children on social media without appropriate permission.
- Anyone who refuses to follow photography restrictions may be asked to stop photographing or leave the event.

RTA Kids may impose a **no-photography or no-filming rule** where necessary for safeguarding or venue requirements.

22. School and External Venue Events

Where RTA Kids performs or teaches at a school, theatre or other external venue, the photography and filming rules of that organisation or venue must also be followed.

If the venue has stricter requirements, the stricter requirements will apply.

23. Storage and Security

Digital photographs and videos must be stored securely.

RTA Kids will take appropriate steps to ensure that:

- Access is restricted.
- Images are not stored unnecessarily.
- Images are not shared outside authorised purposes.
- Appropriate passwords and access controls are used.
- Images are transferred securely where required.
- Images are deleted or securely disposed of when no longer required, subject to legitimate retention requirements.

Images must not be stored indefinitely simply because they might be useful in the future.

24. Retention of Images

RTA Kids will retain images only for as long as there is a legitimate reason to do so.

Different retention periods may apply depending upon the purpose.

For example:

- Promotional material may need to be retained while it remains current.
- Production photographs may form part of RTA Kids' historical archive.
- Images used for teaching may be deleted when no longer required.
- Images connected with safeguarding matters may be retained in accordance with safeguarding record-keeping requirements.

Where an image is no longer required for its original purpose and there is no other lawful reason to retain it, it should be deleted securely.

25. Data Protection

Photographs and video recordings may constitute personal data where an individual can be identified.

RTA Kids will process such information in accordance with:

- UK GDPR.
- Data Protection Act 2018.
- RTA Kids' Privacy Notice.
- RTA Kids' Data Protection Policy.

RTA Kids will ensure that parents/carers are informed about:

- What images are taken.
- Why they are taken.
- How they may be used.
- Who may see them.
- How long they may be retained.
- How consent can be withdrawn where consent is the relevant lawful basis.

The ICO's guidance confirms that organisations should explain the lawful basis for using photographs and videos and should not assume that consent is automatically the appropriate lawful basis in every circumstance.

26. Safeguarding Concerns Involving Images

If a member of staff becomes concerned that an image:

- Is inappropriate.
- Has been shared without permission.

- Has been taken in a private area.
- Has been sexualised.
- May be connected to grooming or exploitation.
- Has been shared by a child or adult inappropriately.
- May constitute abuse.
- Places a child at risk.

they must **not investigate the matter themselves**.

The concern must be reported immediately to the DSL.

Where the concern involves potentially illegal sexual images of a child, staff should **not copy, forward, download or unnecessarily view the image**. The DSL should seek appropriate safeguarding and/or police advice.

27. Incidental Images

RTA Kids recognises that children may occasionally appear incidentally in:

- Group photographs.
- Performance footage.
- Audience photographs.
- Wider venue shots.
- Public event footage.

RTA Kids will take reasonable steps to minimise the use of identifiable images of children who do not have relevant consent where promotional use is intended.

Where a parent/carer raises a legitimate safeguarding concern regarding an incidental image, RTA Kids will assess the situation and take reasonable action.

28. Professional Conduct

Any adult working with RTA Kids who deliberately breaches this policy may be subject to:

- Investigation.
- Removal from photography/filming duties.
- Suspension from activities where appropriate.
- Disciplinary action.
- Termination of employment or contract.
- Referral to the LADO or other safeguarding agency.
- Police referral where appropriate.

A breach involving an image of a child may be treated as a safeguarding matter, not simply a data protection or administrative issue.

29. Staff Responsibilities

All RTA Kids staff and volunteers must:

- ✓ Read and understand this policy.
- ✓ Follow RTA Kids photography and filming procedures.
- ✓ Respect children's privacy and dignity.
- ✓ Maintain professional boundaries.
- ✓ Use only authorised devices and systems where required.
- ✓ Report concerns promptly.
- ✓ Never take inappropriate photographs.
- ✓ Never photograph children in private areas.
- ✓ Never share student images through personal social media.
- ✓ Never use student images for personal purposes.
- ✓ Follow individual safeguarding restrictions.
- ✓ Follow instructions given by the DSL.

30. Parent/Carer Responsibilities

Parents/carers are asked to:

- Respect photography restrictions.
- Avoid photographing other children without permission.
- Never photograph in changing rooms or toilets.
- Follow venue requirements.
- Avoid posting identifiable images of other children without permission.
- Inform RTA Kids of relevant safeguarding restrictions.
- Keep their photography consent preferences up to date.
- Contact RTA Kids promptly if they have concerns regarding an image.

31. Children and Young People's Views

RTA Kids recognises that children and young people should be treated with respect and, where appropriate, their views should be considered.

As children develop in age and understanding, staff should explain photography and filming in an age-appropriate way.

A child's objection to being photographed should not simply be dismissed because parental consent has been provided.

Where a child is uncomfortable with being photographed or filmed, staff should consider the reason and, where reasonably possible, accommodate the child's wishes.

Where there is a safeguarding concern, the DSL should be consulted.

32. Policy Review

This policy will be reviewed annually and sooner where necessary.

The policy will be reviewed following:

- Changes to legislation.
- Changes to safeguarding guidance.
- Changes to data protection requirements.
- Significant safeguarding incidents.
- Changes to RTA Kids' activities.
- Advice from safeguarding professionals.
- Recommendations from Essex safeguarding partners.

Policy version: 2026–2027

Reviewed: August 2026

Next review: August 2027