



KCACR Policy on Photography, Video and Audio Recording

1. Purpose

The Kent County Association of Change Ringers (KCACR) recognises the importance of promoting bellringing while maintaining a safe, respectful and inclusive environment for all participants.

This policy sets out how photography, video and audio recording (hereafter referred to as “Recording”) should be managed at KCACR, District or Tower activities in a way that is consistent with:

- UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018
- Good safeguarding practice, including KCACR safeguarding policies and procedures and Church of England safeguarding guidance
- the CCCBR Code for Ringing

For the purposes of this policy, “Recording” includes photography, video recording and audio recording, whether on a phone, camera or other device, where an individual may be identifiable.

2. Scope

This policy applies to:

- all KCACR organised events, practices and meetings
- District and Tower activities
- use of images, video or audio in KCACR, District or Tower communications, including newsletters, websites, social media and promotional materials

It applies to adults, children and adults at risk, with additional requirements where children or adults at risk are involved.

3. General Principles

- A clear distinction is made between **recording** and **publication or sharing**.
- Safeguarding of children and adults at risk takes priority at all times.

- Recording should be carried out openly, respectfully and with consideration for others.
- Members' wishes regarding privacy must always be respected.
- No one should feel pressured to be recorded or featured.

4. Adults (aged 18 and over)

4.1 Recording

Photography and video recording may take place at KCACR, district or tower events and activities where this would reasonably be expected, such as ringing practices, outings, training sessions and social events.

Any adult who does not wish to be recorded should inform the event organiser, tower captain or the person recording. This request must be respected.

4.2 Publication and sharing

Photographs, video or audio recordings showing identifiable adults must not be published or shared publicly (for example, in newsletters, on websites, social media or video platforms) unless permission has been obtained from those shown.

Permission may be:

- **Explicit**, for example, verbal or written agreement; or
- **Implicit**, demonstrated by clear and informed behaviour such as posing for a photograph, submitting images for publication, or otherwise indicating agreement.

Silence, inaction or failure to object does not constitute permission.

5. Children and Adults at Risk

This section reflects and reinforces existing KCACR safeguarding rules.

- Recordings of a child or adult at risk must only be taken with the prior permission of a parent, guardian or appropriate carer.
- Explicit consent must always be obtained before any publication or sharing of images, video or audio in which a child or adult at risk is identifiable.
- Implicit permission is not sufficient for children or adults at risk.
- These requirements apply equally to newsletters, websites, social media and any other form of publication.

6. Audio Recording

An audio recording that captures voices or conversations should only take place with the knowledge of those present.

Any audio intended for publication or sharing requires permission from all identifiable individuals.

7. Use in KCACR, District and Tower Communications

This section applies to *all* KCACR, District or Tower communications, including (where applicable) newsletters.

- Written reports, results and articles naming adult ringers are normal editorial content and do not require consent.
- Contributors submitting photographs or other media for publication confirm that permission has been obtained from those shown.
- Images or recordings of children or adults at risk will only be published where explicit consent has been obtained and recorded.

Districts without newsletters are equally bound by this policy when using websites, social media or other communications.

8. Opt-out and Objections

- KCACR recognises the right of any member to opt out of being recorded or featured.
- Any objection raised before or after recording must be respected promptly.
- Where appropriate, published material will be removed or not reused.

9. Responsibility

- Individuals making recordings are responsible for ensuring that any publication complies with this policy.
- Event organisers and tower captains should help communicate this policy and support members who wish to opt out.
- The KCACR Safeguarding Officer remains the point of contact for advice where there is uncertainty.

10. Review

This policy will be reviewed periodically by the General Committee to ensure it remains aligned with safeguarding guidance, data protection law and good practice.

Adoption date: 28th February 2026

References

1. UK General Data Protection Regulation (UK GDPR), UK legislation
<https://www.legislation.gov.uk/eur/2016/679/contents>
2. Data Protection Act 2018, UK legislation
<https://www.legislation.gov.uk/ukpga/2018/12/contents>
3. Information Commissioner's Office (ICO), UK GDPR guidance and definition of personal data
<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>
<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/personal-information-what-is-it/what-is-personal-data/>
4. Information Commissioner's Office (ICO), Guidance on photographs and data protection
<https://ico.org.uk/for-organisations/advice-for-small-organisations/news-blogs-and-events/blogs/taking-photographs-data-protection-advice-for-schools/>
5. Church of England, Safeguarding guidance and e-manual
<https://www.churchofengland.org/safeguarding>
6. Central Council of Church Bell Ringers, Safeguarding resources and Code for Ringing
<https://cccbr.org.uk/safeguarding/resources/>
<https://cccbr.org.uk/bellringing/code-for-ringing/>
7. Kent County Association of Change Ringers, Adopted Code for Ringing (PDF)
<https://kcacr.org.uk/wp-content/uploads/2024/03/CCBR-Code-for-Ringing-Edition-1-v1-285-adopted-2024.pdf>

References

1. UK General Data Protection Regulation (UK GDPR), UK legislation
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4. Information Commissioner's Office (ICO), Guidance on photographs and data protection
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5. Church of England, Safeguarding guidance and e-manual
<https://www.churchofengland.org/safeguarding>
6. Central Council of Church Bell Ringers, Safeguarding resources and Code for Ringing
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<https://cccbr.org.uk/bellringing/code-for-ringing/>
7. Kent County Association of Change Ringers, Adopted Code for Ringing (PDF)
<https://kcacr.org.uk/wp-content/uploads/2024/03/CCBR-Code-for-Ringing-Edition-1-v1-285-adopted-2024.pdf>