



British School of Ulaanbaatar

5.9 – Use of Images

All images, including still photography and video created at the British School of Ulaanbaatar will be used in accordance with the Data Protection Policy (see [5.2 – Data Protection Policy](#)) and mindful of the need to safeguard the welfare of our students (see [3.5 – Safeguarding and Child Protection](#)). This means that images will be:

- fairly and lawfully processed;
- processed for limited, specifically stated purposes only;
- used in a way that is adequate, relevant and not excessive;
- accurate and up to date;
- kept on file for no longer than is necessary;
- processed in line with an individual's legal rights;
- kept securely;
- adequately protected if transferred to other countries.

As a body, the Senior Leadership Team is responsible for ensuring the acceptable, safe use and storage of images, cameras and related equipment within the School.

Permission Process

On entrance to BSU, the parents of all students sign a permission slip granting the School permission to take and use images of students taking part in the educational process and other activities at the School. However, use of such imagery must be monitored and controlled as they are deemed sensitive data in line with the School's Data Protection policy. Should the School wish to use images for publication beyond the School such as for marketing, training, publicity or use by the press, parents will be contacted and given the option to opt-out of such external usage. This is achieved by return of a completed 'Use of Images Opt-Out Release' included with this policy in Appendix A. Records of all consent details will be kept securely on file (see [5.3 – Retention of Records Policy](#)). Should permission be withdrawn by parents at any time, then all relevant images will be removed and disposed of, and the record will be updated accordingly. Images will not be kept for longer than is to be considered necessary and will be disposed of should they no longer be required. They will be deleted and wiped or shredded as appropriate. The Marketing Manager will ensure that all photographs are permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use.

Copies of images will always remain on site unless prior explicit consent has been given by both the Headmaster and the parents of any child or young person captured in any photograph. Should permission be given to take images off site, all relevant details of access and security are to be recorded, such as appropriate encryption. Any storage device, memory stick, CD or other piece of equipment containing images of children to be taken off-site for further work must be suitably encrypted, logged in and out by the Marketing Manager and monitored to ensure it is

returned within the expected time scale. Members of SLT and the Marketing Manager reserve the right to view any images taken and/or to withdraw or modify a member of staff's authorisation to use images off-site at any time.

Guidelines regarding creation and use of images by staff

Staff will receive information regarding the safe and appropriate use of images as part of their training and responsibilities. The following guidelines are provided to advise staff in the correct use of images.

- Images or videos that include children will be selected carefully when used online and will not provide material that could be reused.
- Children's full names will not be used on the website in association with photographs.
- The School will never include any personal details of students including but not limited to addresses, emails, telephone numbers, fax numbers on video, on the website, in a prospectus or in other printed publications.
- The School will only use images of children who are suitably dressed.
- Children's work will only be published with their permission or their parents' consent.
- All members of staff (including volunteers) will ensure that all images are available for scrutiny and will be able to justify any images in their possession.
- Only official School-owned equipment including but not limited to digital and video cameras, tablets and computers will be used by staff to capture images of children for official purposes. Use of personal cameras or mobile phones by staff is prohibited.
- Any apps, websites or third-party companies used to share, host or access children's images will be risk assessed prior to use. The School will ensure that images are held in accordance with the School's Data Protection Policy (see [5.2 – Data Protection Policy](#)) and that suitable child protection requirements (if necessary) are in place.
- The School will discuss the use of images with children and young people in an age-appropriate way. Careful consideration is given before involving young or vulnerable children when taking photos or recordings, who may be unable to question why or how activities are taking place.
- Images will not be taken of any child or young person against their wishes. A child or young person's right not to be photographed is to be respected.
- Photography is not permitted in sensitive locations such as changing rooms, toilets, swimming areas etc.

Use of Images by Parents

Parents are permitted to take photographs or DVD footage of events for private use only. Parents are only permitted to take or make recordings within designated areas of the School. Photography is not permitted in sensitive areas such as changing rooms, toilets, swimming areas etc. Parents who are using photographic equipment must be mindful of others when making and taking images. The opportunity for parents to take photographs and make videos can be reserved by the School on safety grounds. The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time. Parents

may contact the School Marketing Manager to discuss any concerns regarding the use of images.

Use of Images by Students

The School will discuss and agree age-appropriate acceptable use rules with children regarding the appropriate use of cameras, such as the locations students may not take cameras (e.g., unsupervised areas, toilets etc.). The use of personal devices e.g., mobile phones, children's own digital cameras, is covered in the school's rules (see [3.3 – School Rules for Students](#)). All staff will be made aware of the acceptable use rules regarding children's use of cameras and will ensure that children are appropriately supervised when taking images for official or curriculum use. Photos taken by children for official use will only be taken with parental consent and will be processed in accordance with the School Data Protection Policy. Parents will be made aware that children will be taking photos/videos of other children and will be informed how these images will be managed by the setting e.g., will be for internal use by the setting only (not shared online or via any website or social media tool). Photos taken by children for official use will be carefully controlled by the School and will be checked carefully before sharing online or via digital means. Still and video cameras provided for use by students and the images themselves will not be removed from the setting. Members of staff will role model positive behavior to the children by encouraging them to ask permission before they take any photos.

Use of Images of Children by the Media

Where a press photographer is to be invited to celebrate an event, every effort will be made to ensure that the newspaper's (or other relevant media) requirements can be met. A written agreement will be sought between parents and the press which will request that a pre-agreed and accepted amount of personal information (e.g., first names only) can be published along with images and videos. The identity of any press representative will be verified, and their access permitted only when specifically invited to attend planned events. No authorisation will be given to unscheduled visits by the press under any circumstances. Every effort will be made to ensure the press abides by any specific guidelines should they be requested. No responsibility or liability however can be claimed for situations beyond reasonable control, and where the setting is to be considered to have acted in good faith

Use of Professional Photographers

Professional photographers who are engaged to record any events will be prepared to work according to the terms of the School's policies. To this end, photographers will sign an agreement which ensures compliance with the Data Protection Policy and that images will only be used for a specific purpose, subject to parental agreement and consent. Photographers will not have unsupervised access to children and young people.

Use of Closed-Circuit Television (CCTV) and Webcams

CCTV cameras will be appropriately placed within the School and not cover toilets or changing areas, supporting the privacy and dignity of all members of the School community. All areas which are covered by CCTV or webcams will be well signposted, and notifications displayed so that individuals are advised before entering such vicinity. Recordings will be retained for a

limited period only and for no longer than their intended purpose. This will generally be a maximum of 30 days. All recordings are to be erased before disposal. Regular auditing of any stored images will be undertaken by the IT Technical support team and other members of staff as designated by the management team. If cameras record activities taking place on the premises which are of a criminal nature or give any cause for concern, then information will be referred to the appropriate agency.

Lead Author: Jonathan Warner	Date drafted: August 2020
Date for Review: August 2022	BoD authorisation: Confirmed



British School of Ulaanbaatar

Use of Images in School: Opt-out Release

I, the undersigned, **do not** authorize the British School of Ulaanbaatar (BSU), their officers, teachers, employees or agents to record photographs or other images or likenesses of the Student named below in the form of video, audio, film or stills, whether on digital media or any other medium.

I further do not authorize BSU to use, reproduce, modify, distribute or publicly exhibit such data recordings in whole or in part for any purpose.

I do not consent to the use of the name, voice or biographical material of the student named below in connection with any such recording or other media.

Name of Student

Names of Parents/Guardian

Postal Address

.....

Telephone

Email address

I have read this 'Photography in School: Opt-out Release' form and am familiar with its contents.

(Please cross out the option below which does not apply).

I confirm that I, the student named above, am legally of full age.

or

I confirm that I am the parent or guardian of the student named above.

Signed:

Student (if over 18)

Signed:

Parent/Guardian

Date:

PLEASE RETURN THE COMPLETED FORM TO THE BSU REGISTRAR

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