

## **ASW Photography and Video Policy**

The below Policy establishes the framework in which the American School of Warsaw ("ASW") may take and use photographs or recordings of its students. It also describes the situations where parents and guardians are permitted to take photographs and record videos at designated school events.

Photographs and videos of ASW students may be taken by staff, students and third-party contractors, throughout the school year to record and share everyday life at ASW as well as, upon parents' consent, for marketing purposes and in external materials of ASW.

### **Legitimate interests**

These images of ASW Students may be used based on legitimate interests of ASW for educational, safety and information purposes, including:

- in school ID Cards;
- for ASW's online administration system (PowerSchool);
- in internal ASW materials, e.g. eNotes, classroom projects, classroom blogs and school displays

### **Consent**

Using images or recordings of students for marketing purposes or in external publications, such as official website, school managed social media, handbooks, school promotional publications either in digital or printed campaigns, requires the consent that parents grant at enrollment or re-enrollment.

While the school encourages all parents to provide consent, as this enables us to include all children in depictions of school life, we recognize and respect the right of parents to refuse consent. However, please note that lack of the above consent may result in the student being asked to step away from the group when a photograph is taken, so that their image is not included in the published materials.

Parents may withdraw consent at any time or grant consent if they had previously declined. Please note that in this situation, the processing of personal data carried out prior to such withdrawal will not be affected.

ASW may use photographs of students, without the prior consent of parents/legal guardians, in the school's legitimate interest, when photographs are necessary for identification purposes for making school ID cards and thus ensuring security on campus, or when such photographs are used for School's online administration system (PowerSchool).

### **The conditions of use of photos and videos**

The photos and videos of the students may be used under the following conditions:

- Any material published online or in school publications should be assessed by the Communications Office to ensure it does not feature any child whose parent has not given consent.
- No photos and recordings must offer any means of identifying a child by name.
- When photographing children, the school will ensure all children are appropriately dressed.
- Images of large crowds wherein faces cannot be easily distinguished and therefore identified will not require the consent of each child photographed.
- The school will ensure that electronic images are stored on a secure network that cannot be accessed by members of the public.

Given the fact that photos and recordings are considered personal data, all the rights provided under the Privacy Notice dedicated to parents shall apply accordingly. In this respect, please consult the Privacy Notice available on the school's website at [www.aswarsaw.org/privacynotice](http://www.aswarsaw.org/privacynotice). ASW shall store the images and recordings of students for as long as they serve the purposes for which they were initially taken.

### **Use of camera phones and other recording devices by others**

Visitors will be advised not to use their camera phones while at the school and where possible, will be accompanied by a staff member for the duration of their visit.

### **Rules for Parents and Guardians**

Parents and guardians are permitted to take photographs and record videos at designated school events, as long as they agree to the conditions described in this policy. These events include:

- Musical Events
- Sport Tournaments
- Drama Productions
- Class Assemblies
- Graduation activities
- PTO Events i.e. Color Run, Fall, and Spring BBQ
- Maker Faire
- New Family Orientation Day
- Traditional holiday-related events i.e. Carnival
- UN Day
- Studniówka

At these events, photos may only be taken at the location of the event that depicts the event itself. For most of these, this is the school theatre, gyms, sports fields. Parents and Guardians are not permitted to take photos in classrooms or elsewhere in the school unless explicitly authorized by the school principal. Outside designated events, it is not permitted to use a camera on school premises at any time outside these designated events unless explicitly authorized by the school principal.

### **Distribution and publication of photos and videos**

Where parents or students' families or students take photos or videos of other students on school premises or in the context of various school events or activities, for purely personal, household or recreational purposes, this policy shall not apply and the school shall not bear any responsibility with regard to the use of those photos or videos. The above pertains to photos and videos taken at ASW events off campus as well (such as the graduation ceremony).

The school hereby kindly requests parents to use all images and video taken as described above with maximum regard to the rights and liberties of other persons, especially children appearing in those photos or videos.

Where students or parents will take photos or videos for official use of the school, ASW shall take care that these photos will be handled and used according to this Policy.

The school shall update this Policy every 2 years, in order to ensure its compliance with evolving technology and changes with respect to the data protection regulatory framework.