

Introduction

This Policy provides information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by George Watson's College ("the School"). It also covers the School's approach to the use of cameras and filming equipment at School events and on School premises by our staff, parents and pupils themselves, and the media.

It acknowledges that our obligations under the General Data Protection Regulation (GDPR) have an impact on how everyone associated with George Watson's College takes, stores and uses photographs.

It applies in addition to the School's Enrolment Agreement and any other information the School may provide about a particular use of pupil images, including e.g. signage about the use of CCTV; and more general information about use of pupils' personal data, e.g. the School's **Privacy Policy**, **Data Storage and Retention Policy** and **Information Security Policy**, and issues surrounding images of children in our **Child Protection** policies (such as the **Social Media** policy).

General points

Certain uses of images are necessary for the ordinary running of the School; other uses are in the legitimate interests of the School and its community and unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

Parents who accept a place for their child at the School are invited to indicate agreement to the School using images of their child as set out in this policy, by completing the consent form issued before their child starts with us, and may from time to time be asked to give permission if a particular use of the pupil's image is requested. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable if, for example, they are included incidentally in CCTV or a photograph.

We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the School; as well as for important administrative purposes such as identification and security.

Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Bursar as Data Protection Officer for the School by email (dataprotection@gwc.org.uk), telephone (0131 446 6000) or via the Contact Us form available to parents once they log in to the website. The School will respect the wishes of parents (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

Parents should be aware that, from the age of 12 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

Use of Pupil Images in School Publications and Video

Unless the relevant pupil or their parent has requested otherwise, the School will use images of its pupils to keep the School community updated on the activities of the School, and for marketing and promotional purposes, including:

- in communications with the School community (parents, pupils, staff, Governors and former pupils) including by email, on the School intranet and by post;
- on the School's website and, where appropriate, via the School's social media channels, e.g. Twitter, Instagram and Facebook. Such images would not normally be accompanied by the pupil's full name

without permission, unless the pupil's name was already in the public domain, as can be the case, for example, if they are representing their country in sport;

- on internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;
- as part of our video celebrations of the academic year, used at Prizegivings, Assemblies and on Open Morning;
- in the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising would not include any pupil's name and in some circumstances, the School will seek the parent or pupil's specific consent, depending on the nature of the image or the use;
- if a Watson's pupil studies Mandarin, their images may also be used to promote the Swire Chinese Language Centre Edinburgh.

The source of these images will predominantly be the School's staff (who are subject to policies and rules in how and when to take such images), or occasionally pupils. The School will only use images of pupils suitably dressed and the images will be stored **securely and centrally**. Occasionally a professional photographer or video maker will be used for marketing and promotional purposes, or to take traditional formal School photographs (such as Tempest),

Use of Pupil Images for Identification and Security

All pupils are photographed on entering the School and, thereafter, at three-yearly intervals, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group. Parents are informed when these photos will be taken in advance.

CCTV is in use on School premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the **Privacy Policy** and **CCTV Policy** and any other information or policies concerning CCTV which may be published by the School from time to time.

Use of Pupil Images in the Media

Where practicably possible, the School will always notify parents in advance when the media is expected to attend an event or school activity in which their child is participating, and will make every reasonable effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

The media often asks for the names of the relevant pupils to go alongside the images, and these will be provided only if it is deemed appropriate from a Child Protection perspective. This will not be done for Junior School pupils and will only be done for Senior School pupils if the pupil themselves consent.

Security of Pupil Images

Professional photographers and the media are accompanied at all times by a member of staff when on School premises. Photos of pupils are usually taken by members of staff, and if external photographers or video companies are used the School makes every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the School's **Data Protection** and **Privacy Policies**.

The School takes appropriate technical and organisational security measures to ensure that images of pupils held by the School are kept securely on School systems, and protected from loss or misuse. The School will take reasonable steps to ensure that members of staff only have access to images of pupils held by the School where it is necessary for them to do so.

All staff are given guidance on this policy, and on the importance of ensuring that images of pupils are made and used responsibly, only for School purposes, and in accordance with School policies and the law.

Use of Cameras and Filming Equipment (including mobile phones) by Staff

- Staff should not take photographs on personal devices, such as mobile phones, unless there is no other option. If they do, for example to capture a moment for a news story or social media posting, they should pass the image on as soon as possible to the Communications Department, and then delete from their device.
- Photographs of pupils (including those taken for educational purposes) should be passed to the Photos server as soon as is reasonably practical and deleted from the individual staff member's devices, cloud backups and server space. This allows the best ones to be selected and filed into the School's secure photo archive. Staff are encouraged to only pass on those photos for the archive which are of a standard that mean they are likely to be used, or be of some historical importance. The photo archive is only accessible to Communications Department staff.
- Video recorded for a one-off use should be deleted after that use. Video recorded for historical record should be stored on either the AV or Comms Server.
- Staff are not permitted to share images of pupils in the public domain, without the approval of the Head of Communications. Images of pupils are not allowed to be used to advertise third parties.

Use of Cameras and Filming Equipment (including mobile phones) by Parents

Parents, carers or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in School events, subject to the following guidelines, which the School expects all parents to follow:

- We do not permit parents to take photos or to film shows, plays or concert, so the copyrights are not infringed, and performers and those also attending the performances are not disturbed. We may offer a photo opportunity for parents (especially in the Junior School). This will be advertised to parents ahead of the event.
- Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way.
- Parents may not film or take photographs in changing rooms or backstage during School productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.
- The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings.
- Parents must not take photos or video of members of staff or other parents without their express consent.

Use of Cameras and Filming Equipment by Pupils

- All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of our Guidance staff.
- The use of cameras or filming equipment (including on mobile phones) is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset.

Use of Cameras and Filming Equipment by Third Parties (other than those mentioned above)

- No filming or photography can happen on campus without the prior approval of the Head of Communications, and the person filming or taking photographs will usually be accompanied by a member of the Communications Team.

- They must adhere to the principles outlined in this policy, therefore it will only be in specialist situations when staff are unable to carry out the tasks involved that we would use external film crews or photographers.
- If third party film crews or photographers are used appropriate contracts and due diligence in relation to the taking and handling of images of the pupils on the School's behalf will be put in place, e.g. if school photos are taken by companies such as Tempest.

Sanctions

The misuse of images, cameras or filming equipment in a way that breaches this policy, or any of the School's related policies is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.

Publication and Review

This policy will be published on the School website and a link to it shared with staff, parents and any third party photographers and film crews should we use them. Pupils will be made aware of the points raised here in PSD lessons.

Related Policies and Other Documents

Anti-Bullying

Child Protection Policy

Code of Conduct for Pupils (Junior School)

Code of Conduct for Pupils (Senior School)

Code of Conduct for Staff and Volunteers

Computer System Acceptable Use Policy

Data Storage and Retention Policy

Information Security

Management of Visitors

Privacy Policy

Social Media Policy

Version 1/Issue 1/24 May 2018