

## 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 Acceptance Form 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 Policies**, 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 Junior School place for their child 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 footage or a photograph.

We hope parents will feel able to support the School in using pupil images to celebrate the achievements of pupils, for example 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, by email ([dataprotection@gwc.org.uk](mailto: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 a pupil's own rights to have a say in how their personal information is used – including images.

Where images are shared by the school on external-facing platforms e.g. the school website or social media channels, the naming of pupils will only be done with the use of their first name and year group e.g. Kate (S3).

## 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
- In some circumstances images may be shared on relevant partner websites, e.g. the Swire Chinese Language Centre Edinburgh and the Watson's Malawi Partnership.

The source of these images will predominantly be the School's staff (who are subject to policies and rules on 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 only on School devices**. Occasionally a professional photographer or videographer 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, in advance, when these photos will be taken.

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 taken 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 and on the basis of consent from the pupil (over 12), or parent (under 12), in line with this policy. This will not be done for Junior School pupils and will only be done for Senior School pupils if the pupil themselves gives 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 transfer all images for storage to a department Google Drive, or pass them to the Marketing and Communications, where no department Drive exists, and then delete the images from their device immediately
- All Video content should be stored on either a department Google Drive, or with AV or Marketing and Communications. All video content should be deleted from personal devices immediately
- Staff are not permitted to share images of pupils in the public domain, without the approval of the Head of Marketing. 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 concerts, 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 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 videos 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 Marketing, and the person filming or taking photographs will usually be accompanied by a member of the Marketing 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**

The owner of this policy is the Director of Development, Admissions and Marketing. The Policy is reviewed every two years and is approved by the Principal's Leadership Team. **Next review date November 2025.**

This policy will be published on the School website and staff portal 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  
Safeguarding and Child Protection Policy  
Code of Conduct for Pupils (Junior School)  
Code of Conduct for Pupils (Senior School)  
Code of Conduct (Staff and Volunteers)  
Information Security: Acceptable Use Policies  
Data Storage and Retention Policy  
Information Security: CCTV Policy  
Management of Visitors  
Privacy Policies (Various)  
Social Media Policy

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## **Appendix 1**

### **Photography and Filming Guidelines**

The points raised in the Policy regarding taking, storing and using images hold true for its use in a professional capacity. The School believes that photography and film provides a useful way to communicate with our pupils, parents, prospective parents, former pupils and the wider community.

Staff who take, store or use images must be aware, at all times, that they are representing the School, and must adhere to the following rules and must not cause harm, embarrassment or loss of reputation to the School through the taking, posting, or reposting, of communications (or links to such), regarded by the School as inappropriate in any way.

The following guidelines should always be adhered to:

- **Understand GDPR and data protection legislation and never post content unless relevant, and explicit consent has been given.** All pupils must have given consent prior to the use of their image being used. Pupils over the age of 12 can give verbal consent at the time of photographs/ video being taken. A record of consent for Junior School pupils is held by the Junior School. If you are sending photographs/ videos to any staff with access to post on School Social Media channels, it is your responsibility to gain consent ahead of sending.
- **Inappropriate images.** Images of pupils in swimwear or revealing clothing should not be taken. If in the context of sport additional guidance should be sought from the Marketing and Communications Team before any images are used or shared.
- **Remember once published it stays published.** Comments, posts and images are public and permanent, even with online privacy settings in place and sometimes even if you delete the content.
- **Treat people with respect and ensure images reflect this.**
- **A picture is worth a 1,000 words.** Images and videos are an excellent way of engaging your community but when you publish pictures of other people, or mention them in any publications, or on social media, think about how they will feel and don't forget to check that relevant approval has been given by parents, pupils and staff.
- **Never identify a pupil by using their full name, social media tag** or other information which makes them identifiable.
- **Beware of taking images where pupils may be wearing branded or sponsored items of clothing.** This is especially important with commercial suppliers as it could amount to advertising.
- **If in doubt** – contact a member of the Marketing and Communications Team.