

# Taking, Storing, and Using Images of Children Policy

Level: Public

**Approval:** Executive Board

Writer: Bursar Review Frequency: 3-yearly
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**Linked Policies:** Child Protection and

Safeguarding Policy, Data Protection Policy, Privacy Notice, Record Keeping Policy, e-Safety (Acceptable Use) Policy, Parent Agreement

### I. This Policy

- 1.1. This Policy is intended to provide information to students and their parents, carers or guardians (referred to collectively in this Policy as "parents") about how images of students are normally used by Wellington College International School Bangkok ("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 parents and students themselves, and by the media.
- 1.2. It applies in addition to the Terms and Conditions in the WCIB Parent Agreement, and any other information the School may provide about a particular use of student images, including inter alia signage about the use of CCTV; and more general information about use of students' personal data as detailed in the School's Data Protection Policy and Privacy Notice. Images of students in a safeguarding context are dealt with under the School's Safeguarding and Child Protection Policy.

#### 2. General Matters

- 2.1. Certain uses of images are necessary for the daily operation 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.
- 2.2. We hope parents will feel able to support the School in using student images to celebrate the achievements of students, including sporting, in performing arts, and academic; to promote the work of the School; and for important administrative purposes such as identification and security.
- 2.3. Any parent who wishes to limit the use of images of a student for whom they are responsible should make the request in writing to the Master. The School will respect



- the wishes of parents/carers (and indeed students themselves) wherever reasonably possible, and in accordance with this Policy.
- 2.4. Parents should be aware that, from around the age of 12 and upwards, the law recognises students' own rights to have a say in how their personal information is used including images.

### 3. Use of Student Images in School Publications

- 3.1. Unless the relevant student or his/her parent has requested otherwise, the School will use images of its students to keep the School community updated on the activities of the School and to celebrate achievements, and for marketing and promotional purposes, including:
  - 3.1.1. on internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;
  - 3.1.2. in communications with the School community (including parents, students, staff, governors and alumni) including by email, on the staff intranet and by post;
  - 3.1.3. on the School's website and, where appropriate, via the School's social media channels, e.g., Twitter, Instagram, Line and Facebook. Such images would not normally be accompanied by the student's full name without permission obtained in advance; and
  - 3.1.4. in the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising would not normally include student's names and in some circumstances the School will seek the parent or student's specific consent, depending on the nature of the image or the use.
- 3.2. The source of these images will predominantly be the School's staff, who are subject to policies and rules regarding how and when to take such images on School owned devices only, or a professional photographer used for marketing and promotional purposes, or occasionally students or parents. The School will only use images of students in suitable dress and the images will be stored securely and centrally.

## 4. Use of Student Images for Identification and Security

- 4.1. All students are photographed on enrolment with the School and, thereafter, at regular intervals, for the purposes of internal identification. These photographs identify the student by name, year group, house, and class.
- 4.2. These images are securely stored in the password-protected area of the School database, where access is restricted to academic, pastoral, and office staff.
- 4.3. CCTV is in use on the School's premises and will sometimes capture images of



students. Images captured on the School's CCTV system are used in accordance with the Privacy Notice.

### 5. Use of Student Images in the Media

- 5.1. Where practicably possible, the School will always notify parents in advance when the media is expected to attend an event or activity in which students are participating; and will make every reasonable effort to ensure that any student whose parent or carer has refused permission for images of that student, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.
- 5.2. The media often asks for the names of the relevant students to go alongside the images, and these will be provided where parents have been informed about the media's visit and either parent or student has consented as appropriate.

### 6. Security of Student Images

- 6.1. Professional photographers and the media are accompanied at all times by a member of staff when on School premises. The School uses only reputable professional photographers and makes every effort to ensure that any images of students are held by them securely, responsibly, and in accordance with the School's instructions.
- 6.2. The School takes appropriate technical and organisational security measures to ensure that images of students 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 students held by the School where it is necessary for them to do so and on School owned devices only.
- 6.3. All staff are given guidance on the School's Policy on Taking, Storing, and Using Images of Children, E-safety (Acceptable Use) Policy and on the importance of ensuring that images of students are made and used responsibly, only for School's purposes, and in accordance with School policies and Thai law.

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

- 7.1. On a normal School day, parents are not permitted to take photos or video on School campus. However, they are welcome to take photos and, where appropriate, film their own children taking part in special School events. Special permission from the school will be provided in advance of these events, subject to the following guidelines which the School expects all parents to follow:
  - 7.1.1. When an event is held indoors, such as a play or a concert, parents should be mindful of theneed to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and



the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the School therefore asks that it is not used at indoor events.

- 7.1.2. Parents are asked not to take photographs of other students, except incidentally as part of a group shot, without the prior agreement of that student's parents.
- 7.1.3. Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other students should not be made accessible to others via the internet (for example on social media), or published in any other way.
- 7.1.4. Parents are reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts. The School will always print a reminder in the programme of events where issues of copyright apply.
- 7.1.5. 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 students.
- 7.2. 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.
- 7.3. 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. Parents of students taking part in plays and concerts will be consulted if it is intended to make such recordings available more widely.

### 8. Use of Cameras and Filming Equipment by Students

- 8.1. All students 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 the pastoral staff.
- 8.2. The use of cameras or filming equipment, including on mobile phones and tablets, is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by students in a manner that may offend or cause upset.
- 8.3. The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the School's Anti-Bullying Policy, Behaviour Policy, Data Protection Policy, e-Safety (Acceptable Use) Policy or Child Protection and Safeguarding Policy is always taken seriously and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.