

THE BRITISH SCHOOL OF BAHRAIN



School Image Policy

DOCUMENT CONTROL	
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1. Introduction

1.1 This policy is created under Law No. 30 of 2018 with respect to Personal Data Protection ("PDPL") and applies to the use of images in school publicity printed materials including yearbook, newsletters and flyers, on digital media including school website, school social media feeds, teachers' blogs , school YouTube channel, and in the press. In addition, images can also be shared with Inspired Education Group media following the Global Marketing consent procedure. For the purposes of this Policy, the word "image" includes any kind of still or moving image with or without sound and whether stored/transmitted electronically or as hard copy.

1.2 Schools need and welcome positive publicity. Children's images add color, life and interest to images of the school activities and initiatives. Making use of images in school publicity materials can increase student motivation and staff morale and help parents and the local community identify and celebrate the school's achievements.

1.3 British School of Bahrain (also referred herein as "the School" or "BSB") adopts the following guidelines when using images of children in school publicity materials, including use of images / names on the school website, newsletters, displays:

2. Guidelines For Taking Images

- 2.1. Staff are permitted to take images to support educational aims e.g. for classroom displays or projects.
- 2.2. Images should be stored securely and used only by those authorized to do so.
- 2.3. Staff should ensure that image files are appropriately named and will not use students' names in image file names.
- 2.4. When taking images teachers should ensure that the students are appropriately dressed and are not participating in activities that might bring the individual or the school into disrepute.
- 2.5. Digital images should not be manipulated or amended, for example, using a "cut & paste" facility. However, it is acceptable to crop an image.
- 2.6. Students must not take, use, share or publish images of others without consent.
- 2.7. Staff will not take share images in public media and out of educational purposes without previous parental consent.

3. Guidelines For Taking Images At School Events

- 3.1. It is up to school management to decide if they are to allow videos or images to be taken by parents during school events such as Graduation or Award Ceremonies.
- 3.2. Parents are not required to comply with the PDPL when taking images of their children, for their own private use, at an organized event.
- 3.3. The British School of Bahrain will advise parents through appropriate indications or posts (for example, assembly hall or other school facilities) where events or celebrations take place, that they should be cautious in taking and publishing photographs. Parents must be informed that our School will not be responsible in any case for the distribution of images on parents' social networks.
- 3.4. In the event that the British School of Bahrain needs to contract the services of an external photographer as well as any graphic design and image editing services, it will ensure that the corresponding services agreement is signed by both parties and that the supplier adheres and is compliant to the confidentiality and data protection requirements indicated in the PDPL.

4. Guidelines For Publishing Images

- 4.1 Parents will be provided with the Audiovisual Consent Form which will contain information about the uses and contact details of the Data Protection Officer as well as all the non-pre marked boxes to make it possible to choose the options for the use of images, not only in the BSB media but also for Inspired Education Group. Their consent will be the lawful basis for processing the images.
- 4.2 Parents may at any time withdraw their consent/non-consent for the use of student images and digital recordings in school publicity printed materials, on the digital media and in the press. Any such request must be made in writing to the school Principal and the Data Protection Officer. They can also contact with the regional editor at: pereraged@thebsbh.com.
- 4.3 Images of students or staff should not be published on the school website after they leave the school, without their consent. British School of Bahrain shall guarantee, through the corresponding procedure, that parents can easily withdraw their consent at any time and shall attend their query without undue delay.
- 4.4 Except for the yearbook, no other publication will use personal details (including the name) of any child or adult in an image in association with the image (including in the

accompanying text or the image caption) without explicit written permission from the parent / guardian. Student's name and grade will be stated in the school yearbook.

4.5 Where images are taken at an event attended by a large crowd e.g. during Iqra/International Day, this is regarded as a public area, so it is not necessary to get the permission of everyone in a crowd shot before publishing the image on the school website.

5. Closed Circuit Television (CCTV)

5.1 The British School of Bahrain is fully committed to operating a safe environment and has in place the CCTV Policy which stipulates the legal requirements to install and use the video surveillance system; it, therefore, has in place a closed-circuit television ("CCTV") system to assist in providing a safe and secure environment for students, staff and visitors, as well as protect BSB property. The CCTV system comprises a number of fixed cameras located both internally and externally around the BSB Campus. All cameras may be monitored and are only available for use by approved members of staff. Our CCTV is located in a number of locations, but it is NOT installed in classrooms, changing rooms or toilets. Parents are assured that The British School of Bahrain does not stream images collected via CCTV to any third parties or outside agencies. Please note, however, that the school may be legally required to provide CCTV footage to the Police or other law enforcement agencies if requested.

5.2 The British School of Bahrain has installed a CCTV system to:

5.2.1 To increase the personal safety of staff and students and reduce the fear of physical abuse, intimidation and crime.

5.2.2 Protect BSB buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.

5.2.3 To support the Bahrain Police in a bid to deter and detect crime.

5.2.4 Assist in the prevention and detection of crime, misbehavior.

5.2.5 Assist with the identification, apprehension, and prosecution of offenders.

5.2.6 Assist with the identification of actions/activities that might result in disciplinary proceedings against staff and students.

5.2.7 Monitor the security of campus buildings. The system will be provided and operated in a way that is consistent with an individual's right to privacy.

5.3 Image Viewing and Download Procedure

5.3.1 Viewing Recordings may be viewed in the presence of a member of the Senior Leadership Team following a formal request. Otherwise, permission to view CCTV data will depend on the subject of the potential investigation.

5.3.2 SLT members are authorized to review CCTV recordings to ascertain the circumstances relating to potential incidents involving students, staff, contractors, and visitors/public incidents. Should a download be required as evidence, an electronic copy may only be made by the Head of Operations or deputy. Where this is to be released to the Police, this will only be released to the Police on receipt of a written request and on the sight of their warrant card/proof of identity. Where this is requested by an SLT member relating to a student incident, the request must be put in writing (e.g. via e-mail). CCTV footage may be released for civil proceedings at the written request of a solicitor or insurance company.

5.3.3 All requests for access to view/copy CCTV footage by individuals should be made in writing following the same procedure for the exercise of right request implemented in our School. Requests for access to CCTV images must include:

5.3.3.1 The reason for the request

5.3.3.2 The date and time the images were recorded

5.3.3.3 Information to identify the individual, if necessary

5.3.3.4 The location of the CCTV camera

5.3.4 Third parties who wish to have a copy of CCTV images (i.e. images not of the person making the request) do not have a right of access to images under the PDPL, and care must be taken when complying with such requests. CCTV Downloads or viewings of CCTV requested by other parties, including parents, and for purposes outside the scope of this policy are not permitted.

5.3.5 Recorded images will be retained for 120 days from the date of recording as per Bahraini law, unless required for evidential purposes or the investigation of crime or otherwise required and retained as a download. All images on electronic storage will be

erased by automated system overwriting. All downloads, still photographs and hard copy prints will be securely disposed of as confidential waste.

5.3.6 Complaints regarding the CCTV system and its operation should be made under the BSB complaints procedure.

6. Concerns

6.1 If parents have any concerns about inappropriate or intrusive imagery at a school event, they should report their concerns to the School Data Protection Officer (dataprivacy@thebsbh.com) or Executive Headmaster.

6.2 If a parent or child wishes to have an image removed from the school website, prospectus etc. at any time, they should contact the respective Heads of Schools and involve the Data Protection Officer as previously indicated.

6.3 When a press image has been captured the data controller for that image is the media concerned and not the School. Therefore, parents will need to make any objections to that organisation and not the School.

6.4 BSB will provide to parents information about the Data Protection Authority at all times, just in case they want to file a claim before the Authority, which can be contacted at: <http://www.pdp.gov.bh/en/index.html>, but the School will try to solve the claim in order to avoid any action before the Authority.