

Name Taking, Storing and Using Images of

Students Policy

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1. Introduction

Any identifiable image of a person is considered to be personal data under Thailand's PDPA. This policy highlights the processes expected to be followed in taking and handling images of BISP students, other members of the school community and visitors to the campus.

The use of student images and videos can be required as part of internal and external assessment processes. They are also used more generally in teaching, learning, coaching and marketing.

For this policy a "device" refers to mobile phone, laptop, computer, tablet, camera, or any equipment capable of taking images or recording audio/visual content.

2. Notes:

- Parents who accept a place for their child at BISP should note the relevant clause in the school's terms and conditions relating to the use of students' images.
- Parents should be aware that certain uses of their child's images may be necessary or unavoidable for example if they are included incidentally in CCTV, a photograph, live streaming or a video.
- Parents who wish to limit the use of images of a student for whom they are responsible should contact the relevant Principal. The school will respect the wishes of parents/guardians (and students themselves) wherever reasonably possible and in accordance with this policy.
- Parents who are concerned about the use of their child's images should discuss those concerns with the relevant Principal.
- Students and staff on school trips should follow the directions of the trip leader with regards to device use.
- Link to Privacy Policy

3. Responsibilities

If you are photographing or videoing then you are responsible for ensuring relevant processes relating to consent, storage and deletion are adhered to. All members of the community should comply with the privacy policy, policies which relate to images of students and specific guidance or directions for individual events.

BISP also provides codes of conduct and graphics to provide guidance for community members. See appendix 1.

4. Students Taking Images or Filming Videos, during the School Day

Students should only take photos or make videos in school when directed to do so by a teacher. Where images of other students are included then the video should be used only as agreed by all the participants and as directed by the teacher.

If a student is concerned about how a video or image may be used then the teacher should make arrangements for increased supervision and control. This is likely to include using school-owned



rather than personal devices to take and edit the images. All students are encouraged to report any concerns about the misuse of technology to a member of staff.

The school rule regarding mobile devices is "Not seen, heard or used without permission". A desire to take a photograph is not sufficient reason by itself to justify getting a mobile device out. They should only be used if a teacher gives specific permission to use mobile devices.

The use of cameras or filming equipment (including mobile phones) is not allowed in restrooms, changing rooms, or any settings that are deemed inappropriate or where the images or manner may offend or cause upset.

The use of images, mobile phones or filming equipment must also comply with the school's policies including Anti-Bullying Policy, Data Protection Policy, IT Acceptable Use Policy, Child Protection Policy and general school rules and behaviour expectations. Any breach of these expectations, particularly if it results in inappropriate images could have serious consequences both internally and externally.

During school events students should follow the directions given for school community members with regards to photography and videos, unless informed otherwise.

BISP reserves the right to create temporary or permanent "no device zones" on the school campus.

5. Parents or other Adults Taking Images or Filming Videos

Community members are welcome to take photographs of (and where appropriate, film) their own children taking part in school events subject to the following guidelines:

- Community members are asked not to take photographs of other students without the prior agreement of that student's parents, except incidentally as part of a group shot
- Only use the images for personal use and avoid sharing or publishing them on the internet, social media or in any public way
- Refrain from filming or taking photographs in restrooms, changing rooms, or any settings that are deemed inappropriate
- Use cameras and filming devices thoughtfully and respectfully towards others
- The school reserves the right to refuse or withdraw permission to film or take photographs

(Extract from Code of Conduct for Parents and Community)



6. Consent

Any image or filming should only be taken with the consent of the student and/or their parents.

On admission to school, all parents will be asked to give consent for taking images of their children.

Additionally:

The school will ask the parents of a student for specific consent to publish (writing, images or videos) in the following situations:

- The student is identified by full name
- The student is featured prominently and is readily identifiable
- The student is identifiable and the material will be widely published

In the following situations consent to photography is assumed:

- Annual School Photos (students/parents may opt-out)
- Images of High-Performance Athletes participating in their chosen sport
- Large-scale or public events on the school campus

7. Right to Delete

Any time an image is taken that may be of concern to a student, that student or their parents should contact the school and we will endeavour to ensure that the image is deleted.

This may not be possible including where it is an image required as part of an external assessment or that has already been published.

8. Device Use for BISP Staff

Staff are advised to use school devices whenever possible. The following precautions should be implemented:

- Images should be moved to the relevant Google Shared Drive
- Images should be deleted from the device at the earliest possible time and definitely before others use the device
- Devices should be stored in a secure location

However, the use of personal devices is permitted, provided:

- Prior approval has been obtained from the relevant Principal or the Principal is informed at the earliest opportunity.
- The image is transferred at the earliest opportunity to the relevant Google Shared Drive.
- The original image is deleted from the personal device and any backup media or online storage within one week.
- The personal device uses encrypted storage.



9. Storage and Deletion

Any storage of images must be included in the school's Data Protection (PDPA) records. This specifies why and for how long images can be stored before deletion. The Data Protection Officer will advise staff accordingly.

All images of students should be stored in Google Shared Drives with appropriately restricted access (generally limited to BISP staff)

Images may be downloaded to a teacher's computer for processing, but once that processing is complete they should be deleted from the computer.

Images should not be stored indefinitely or with the intent of using them for a purpose other than originally intended.

Any copies made of images whether hard-copy or digital need to be treated with the same care as the original.

BISP takes technical and organisational security measures to ensure that images and videos stored by the school are kept securely and protected from misuse.

10. Usage

Anytime photographs or videos are taken, any students involved should be informed of the purpose of the images and they should only be used for that purpose. Further consent may be required if the images are to be used in other contexts,

For Academic Purposes including assessment, basic consent from parents is requested when the student joins the school. Students should still be informed that images are being taken and for what they will be used.

The source of images and videos will predominantly be school staff and trusted third party providers who are subject to the policies and rules of BISP.

10.1. School Publications

BISP will use images of its students to keep the school community updated on the activities of the school and for marketing and promotional purposes, including:

- Internal displays including digital signage and notice boards on the school premises
- The school's Websites and where appropriate social media channels e.g. Instagram, Facebook, Youtube, X. Such images and videos would not normally be accompanied by the students full name without permission.
- Communications with the school community e.g. emails, updates, blog posts, Yearbook, curriculum booklets.



Print and digital materials including online and external press advertisements. External
advertising would not normally include the students name and in such circumstances the
school will seek the parents and students specific consent.

10.2. Identification and Security

- Students, staff, parents and visitors may be photographed on entering the school premises for security purposes.
- CCTV is in use on the school premises and will capture images of students. CCTV is used in accordance with the CCTV policy.

10.3. Media

- At certain events the media may attend and take photographs or videos of those on the campus.
- Student images may be used in media releases for marketing purposes which may include full names and in such circumstances the school will seek the parents and students specific consent.
- Where possible professional photographers and media are accompanied on campus by a
 member of staff. Every effort is made to ensure that any images of students are held by them
 securely, responsibly and in accordance with the schools policies.



Appendices

Appendix 1: Snap, Share And File Poster

For use on screens during events and routinely in the foyer



Link to Poster as image

Link to poster as pdf

Link to Code of Conduct for Parents and community

Link to Code of Conduct for Visitors and Guests