



Taking, Storing and Using Student Images Policy

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Version	Date	Reason for most Recent Revision
v1.0	February 2024	New Policy
v1.1	June 2024	Minor changes and Inclusion of Footnotes



TAKING, STORING AND USING STUDENT IMAGES POLICY

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1 Introduction

St Christopher's School Bahrain (hereafter referred to as "the School") respects your right to data privacy. This Policy is intended to provide information to students and their parents, carers or guardians (hereafter referred to as "parents") about how images of students are normally used by St Christopher's School Bahrain (hereafter referred to as "the School").

This policy 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.

2 Overview

During the course of the year, photographs, video and/or audio recordings (hereafter referred to as 'images' or 'recordings') of your child(ren) will be taken.

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. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.

We hope parents will feel able to support the School in using student images to celebrate the achievements of students (eg. sporting, academic, extracurricular, etc); to promote the work of the School; and for important administrative purposes such as identification and security.

3 How images / recordings are obtained

3.1 School staff

Images or recordings of students may be taken by authorised / relevant members of staff (eg. Marketing Department, relevant teachers / admin staff, etc).

All staff are given guidance on the School's Policy on Taking, Storing and Using Images of Students, and on the importance of ensuring that images of students are made and used responsibly, only for school purposes, and in accordance with School policies and the law.

3.2 Professional photographers / media and press

Occasionally, the School may invite professional photographers or members of the media / press to the School to take photographs (eg. School-wide photos, School events, etc).

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 / media outlets 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.

3.3 Security

CCTV surveillance (or similar devices) are installed across the School's campuses to monitor School buildings in order to provide a safe and secure environment for students, staff and visitors, and to prevent loss or damage to



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School property. Images / recordings from such systems will be used in accordance with the School's [Privacy Policy](#).

4 Types of image / recording use

Unless a parent has requested otherwise, the School will use images / recordings of its students for the following purposes:

- **Identification:** An image of each student is kept in the School's Information Management System for identification purposes. The School also collects photographic / video recordings through recordings on our campus CCTV systems to allow us to create security passes and for security purposes;
- **Internal:** Student images may be displayed internally / on School networks (eg. School Yearbook, class / hallway wall displays, School calendars, class projects, exam board submissions, parent web platforms, staff / student presentations, etc);
- **Social media:** Student images may be shared on Facebook, Instagram, LinkedIn, YouTube and any other social media platforms used by St Christopher's School;
- **Press, public relations, public events:** Student images may be shared with newspapers / magazines, or in booklets / participation at public events (eg. festive fayre, music events, productions, etc);
- **Marketing:** Student images may be used on the School's website and in print media¹ (eg. Prospectus, brochures, flyers, announcements, advertising, billboards, press releases, etc)².
 - Where possible, the School's Marketing Department informs parents of upcoming photo shoots for marketing / advertising purposes and offers parents a chance to opt out from the photo opportunity.
 - Additionally, the Marketing Department obtains consent from parents for students image / recording use for any external mass media publication (eg. billboards, radio, TV, third party advertising, etc).

The School will only use suitable images of students and the images will be stored securely and centrally. Children's full names will not appear in any social media or news posts (unless parents have provided their consent).

5 How we store images and security of access

The School takes appropriate technical and organisational security measures to ensure that images of students held by the School are kept securely and protected from loss or misuse.

Images and recordings may be stored either on our secure School networks or on our secure cloud-based photo management system. Access to both the School networks and the photo management system is restricted to only authorised members of staff.

¹ The published material may include editing to fit St Christopher's School branding guidelines and combination with other materials, if necessary or desired.

² In case of a publication online, the material will be accessible worldwide. The reuse by a third person (especially through the sharing on social networks) cannot be ruled out. Digital photos and videos can be copied, changed or used further, without St Christopher's knowing or having any influence over this.



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The School will only keep images and recordings of students for as long as is necessary for their intended purposes.

Cloud based photo management system:

The photo management system currently being used in the School also includes an automated facial recognition feature which uses biometric data about your child's image to automatically tag photos that are uploaded to the system (assign a name to a student's image in a photo).

Any biometric data stored in the photo management system is obfuscated from the image and secured within the system making it difficult to reassemble and associate with an image. No biometric data is downloaded with an image.

This system helps the Marketing Department filter through many images to select relevant images for use as described in section 4 above. This system also helps the Marketing Department record any objections to image use that parents may have (since opt-outs can be assigned to student names in the system).

If a parent does not want their child's images to be included in the photo management system's use of the automated facial recognition feature, please contact the Marketing Department (marketing@school.st-chris.net). Instead, manual name tags will be applied to the child's images on the Vidigami system (by the Marketing Department staff).

Data protection:

The cloud based photo management system we use is a GDPR (General Data Protection Regulations) compliant system. The data centres for this system are located in Canada, a country approved by the European Union, United Kingdom, and Bahrain to provide adequate levels of data protection as per GDPR / PDPL requirements.

6 Parents use of cameras and filming equipment (including mobile phones)

Parents are welcome to take photographs / recordings of (and where appropriate, film) their own children taking part in school events, subject to the [Parent Code of Conduct](#) and the following guidelines, which the School expects all parents to follow:

- When an event is held indoors, such as a play or a concert, parents should be mindful of the need 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.
- Parents are asked not to take photographs of other students, except incidentally as part of a group shot.
- 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 platforms), or published in any other way.
- 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.



- Parents may not film or take photographs in areas which may be deemed to be sensitive, for example changing rooms, the swimming pool where children are likely to be in a state of undress or backstage during school productions or events, nor in any other circumstances in which photography or filming may embarrass or upset students.

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 Students use of cameras and filming equipment (including mobile phones)

Please refer to the [Mobile Device Acceptable Use Policy](#) for details on students' use of mobile phones or filming equipment.

Students are reminded that photographs, video, and audio recordings must never take place without the consent of their relevant teacher and the students who are the subject of such recordings. Consent must be explicit, not implied.

The use of cameras or filming equipment (including on mobile phones) is prohibited in areas which may be deemed to be sensitive, for example toilets, washing or changing areas, the swimming pool or backstage during School productions or events.

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 School staff.

The misuse of images, cameras or filming equipment in a way that breaches this Policy or any of the other relevant School's policies (Mobile Device Acceptable Policy, Behaviour Policy, Anti-Bullying Policy) will always be taken seriously, and may be the subject of disciplinary procedures.

8 Objections to image use

St Christopher's School Bahrain respects the right of parents to object to their child's images being used in publicity material.

Any parent who wishes to limit the use of images of their child should contact the School's Marketing Department (marketing@school.st-chris.net)³. The School will respect the wishes of parents wherever reasonably possible, and in accordance with this policy.

Please contact the School's Data Compliance Officer (privacy@school.st-chris.net) if you have any data protection concerns or queries.

³ In cases where consent is withdrawn for images which have been included in published materials (eg. School prospectus, brochures, etc), we are not obligated to remove already published material by us from the website or social media platforms or prints in circulation (until existing stock is exhausted). A complete removal from the internet cannot be guaranteed.



9 Limitation of liability

As stated in this policy, the School may share images of students on its official social media platforms or other marketing channels. St Christopher's School shall not be held liable for any misuse or misappropriation of these images by third parties.

10 Related policies and documents

- [Privacy Policy](#)
- [Parents Code of Conduct](#)
- [Mobile Device Acceptable Use Policy](#)
- [Behaviour Policy - Infant and Junior](#)
- [Behaviour Policy - Senior](#)
- [Anti-Bullying Policy](#)