



# Digital Media for External Use policy

## A – Teaching & Learning Policies & Procedures

|                     |   |
|---------------------|---|
| Key author          | Assistant Head Whole<br>School Digital Pedagogy, Innovation<br>& Safety<br>Data Protection Management Team  |
| Audience            | Employees; Parents; Contractors   |
| Approval body       | Data Management Team, SLT   |
| Approval frequency  | 3 years   |
| Last approved       | January 2025  |
| Date of next review | January 2028  |
| Published           | Classlink; Website; Portal  |
| Linked policies     | <ul style="list-style-type: none"><li>• Safeguarding Policy</li><li>• Data Protection Policy</li><li>• Privacy Notices</li><li>• Consent for Digital Media</li><li>• Subject Access Rights Policy</li><li>• Employee Privacy Policy</li><li>• CCTV Policy</li><li>• ADEK Policy - Digital 25/26</li></ul> |

## Digital Media for External Use Policy

### Policy statement

This Digital Media Policy ("Policy") sets out how The British School Al Khubairat ("we", "our", "us") use digital media containing images of individuals at our school. Through this policy, we aim to protect individuals' right to privacy and minimise the risks to which children can be exposed through the misuse of digital media

The use of digital media can make valuable contributions to the daily life of our school. We wish to responsibly use digital media in a manner consistent with applicable data protection laws, child protection laws, and be respectful of privacy concerns.

The Data Protection Management Team is responsible for approving this Policy. Our Assistant Head - Whole School Pedagogy, Innovation and Safety, as well as the Director of Finance & Operations are responsible for reviewing this Policy on a regular basis.

The British School Al Khubairat ('BSAK') is committed to safeguarding the welfare of all of our students; and this includes ensuring that no digital images of children are taken or stored or circulated in a manner which is inappropriate or unauthorised.

### Definitions

Contractor/Vendor means any individual other than an employee who is paid by the school to deliver services.

Digital Media shall mean all photographs, videos, images, animations, depictions or representations of an identifiable individual, including any associated sound of identifiable people whether recorded or created.

Employee shall mean any applicant, individual who is currently employed by The British School Al Khubairat.

Official school use shall mean the processing of personal data in the context of formal, approved or sanctioned school operations or activities.

Personal Data means any information relating to an individual who can be identified from that information or from any other information we may hold. Personal Data can include names, identification numbers, addresses (including IP addresses), dates of birth, financial or salary details, education background, job titles and images. It can also include an opinion about an individual, their actions or their behaviour. Personal Data may be held on paper, in a computer or any other media whether it is owned by the organisation or a personal device.

- upload Photograph (also referred to as "picture" or "image" in this Policy) shall mean a photograph of an identified or identifiable individual or group of individuals.

Photographs which do not capture the image or likeness of any identifiable individual are excluded from this policy.

Student shall mean a pupil enrolled at our school.

Video shall mean a video of an identified or identifiable individual or group of individuals. Videos which do not capture the image or likeness of any identifiable individual are excluded from this policy.

Volunteer shall mean any individual who has executed a volunteer agreement with the school.

## Context

This Policy is based on the following core principles:

Law:

- Law in the United Arab Emirates states that it is illegal to take a photograph of any person without their express permission.
- The law also states that even if consent has been granted, if requested by the owner of the image, it must be deleted, taken down or removed from circulation.

## Responsible Usage Policies

In line with the ADEK School Digital Policy The school implements and communicates Responsible Digital Usage Policies for students, parents, staff, and visitors. These policies set out what these groups are permitted/prohibited to do on the school's premises, network, and systems, and shall include: The definition of responsible usage of school software, network, services, and digital devices issued by the school, including shared devices. They include standards for the use of personal devices, social media accounts, and the sharing of school-related data.

## Safeguarding

- "Avoid where possible using any personal equipment to take photos and videos of children – use cameras or devices belonging to the organisation, where possible." If this is not possible images should be taken and downloaded to a school drive space within 24 hours and deleted from their personal device.

#### Data Protection:

- This is reinforced through the Data Protection requirements of the GDPR and PDPL. The school's Data Protection Plan has been updated to include specific procedures for handling images of students. These procedures cover the collection, storage, and sharing of images, ensuring compliance with ADEK's data protection guidelines.

#### Staff Training:

- Staff members have and will continue to receive training on an annual basis on the responsible use of digital technology and the updated policy on taking, storing, and using images of children. This training reinforces the importance of adhering to the policy and protecting students' privacy.

#### Communication with Parents:

- Parents will be informed about the updated policy and how it aligns with ADEK's guidelines. This communication ensures transparency and promotes understanding of the school's commitment to digital safeguarding and data protection (Sitting on the school website)The promotion of BSAK and sharing student experiences through School applications, platforms and social media is an intrinsic aspect of a community school, however must adhere to the regulatory guidance set by ADEK, as well as UAE Law, Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data Protection ("PDPL"), which was issued on 26 September 2021.

## General Provisions

This Policy shall only apply whenever employees, contractors, or volunteers process digital media for official school use. Digital media used/processed purely for personal use by parents and children are usually exempt from data protection laws and thus do not fall under this Policy.

Any evidence of the use of any digital media not permitted by this policy by any employee, contractor or volunteer of our school will be reported to the line manager and, as necessary, to appropriate authorities.

Violations of this Policy by employees will be subject to disciplinary action in accordance with our new Employee Privacy Policy. Violations of this policy by contractors are subject to consequences up to and including termination of the school's contract with the contractor, in accordance with our contract with each contractor which stipulates that contractors have to comply with school policies and procedures. Violations of this policy by volunteers are subject to consequences up to and including termination of the volunteer agreement and prohibition from entering school.

Upon enrolment in our school, students will be provided with a Digital Media Consent Form. A parent who provides consent by returning the completed form (either physically or electronically) can have their likeness processed in digital media in accordance with this Policy. Students whose parents refuse to provide consent will not be captured by any digital media covered by this Policy. Prior to the beginning of each school year, parents will be provided with a new consent form to provide consent. At any time, the parents of students are able to withdraw previously-provided consent through communication with the school's dedicated email address [dataprotection@britishschool.sch.ae](mailto:dataprotection@britishschool.sch.ae).

## (i) Taking images

Use of Cameras and Filming Equipment by Staff (Teaching & Support) and or contractors.

Photos and videos:

- If personal devices are used, photos must be transferred to secure school storage and deleted from the personal device within 24 hours.
- Photos should only be used for educational purposes or for approved school-related activities.

When taking photographs in School, staff and or contractors must:

- be clear about the purpose of the activity and what will happen to the photographs when the lesson/activity is concluded;
- ensure that photographs are taken for valid educational purposes and, if in doubt, consult with their line manager;
- ensure that all images are available for scrutiny in order to screen for acceptability;
- be able to justify images of children in their possession;
- avoid making images in one to one situations;
- images of children undertaking activities such as swimming, gymnastics and athletics should focus on the activity they are undertaking, rather than the individual, and avoid showing the full face and body of the child.
- not have images of students stored on personal cameras, devices or home computers beyond 24 hours of being captured;
- not make images of students available on the internet, other than through the official School network/cloud storage/website/social media channels with permission from parents and senior leaders. - This includes Not sharing images or any data of children through WhatsApp or any other channel other than an official BSAK social media channel, or Google Chat Groups where login details have been set up and held by the School.
- Bear in mind, *Article 21 – of the cybercrime Law – ‘prohibits any invasion of privacy of an individual by use of technology without an individual’s consent’*, staff members should be clear about who is and who is not allowed on social media by referring to the most up to date student ‘no photo’ list before posting any content.

- Manipulating digital media which could cause personal or culture offence (e.g., creating "deep fakes") is prohibited without prior written authorisation for employees, contractors, and volunteers.

Any material breach of the above conditions may be considered as a disciplinary matter under the School's Disciplinary Policy and Procedures for staff and in extreme cases may lead to dismissal without notice. Furthermore, staff are advised that such actions may also constitute an offence under the UAE legal system which could lead to severe sanctions including fines, imprisonment and/or deportation.

All breaches will be recorded in an official logbook, decisions, actions and training recorded by the data protection team and recorded via the [dataprotection@britishschool.sch.ae](mailto:dataprotection@britishschool.sch.ae) email address. These will be kept in a school Google drive space Who keeps and where

### Use of Cameras and Filming Equipment by Students

The school has an age-appropriate awareness program for all students, covering the benefits of technology, awareness of online risks, self-assessment of online risks when using technology, online safety measures, and the impact of digital habits on wellbeing (e.g., the impact of duration of usage of digital devices).

Students can utilise their personal device or the School's devices (School issued iPads, Chromebooks, iPod Touch or Camera) to take photographs of work or record videos or even verbal recounts of activities. This can be uploaded onto their School based Seesaw or Google Drive accounts for evidence, but may not be taken from there and used in any other forum.

All students are encouraged to look after each other's welfare, and to report any concerns about the misuse of technology, or any worrying issues to a member of staff.

- The use of cameras or filming equipment (including mobile phones) 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.
- Students are reminded of their obligation to follow the 'Digital Responsible Use' guidelines that they agreed upon and signed on entering their Year Group. The misuse of images, cameras or filming equipment in a way that breaches these guidelines is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

## Use of Cameras and Filming Equipment by Parents

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:

- 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.
- Parents are asked not to take photographs of other students, without the prior agreement of that student's parents. This is clearly stated when all visitors sign in to school and parents will be reminded by security upon entry to the school and sign-posted as such.
- Parents are reminded that such images are for personal use only. Images which may identify other students should not be made accessible to others via the internet on all social media channels (for example on Facebook or Instagram ), 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 changing rooms or backstage during School productions, nor in any other circumstances in which photography or filming may embarrass or upset students.

### (ii) Storing images

- Our school shall retain all digital media in accordance with our Record Management Policy and Record Retention Schedule. If digital media contains images of individuals less than 13 and stored electronically, the file name shall not include the name(s) of the individual(s). Digital media may have different retention requirements depending upon their use (i.e. schools may have to retain photographs used for identity management, such as student ID cards, for a different amount of time from other photographs).
- All digital media are subject to applicable data subject rights.
- Digital media uploaded as social media content in school social media accounts, or any other external capacity (e.g. publicity, advancement) shall only be used after the data subjects (or their parents, if applicable) have provided consent. All "auto-tagging" and facial recognition settings within social media sites shall be disabled when processing any digital media.



- At no point shall any digital media of former students of our school will be used unless we have obtained prior written consent for this specific use.
- In the case of uploads onto platforms such as Seesaw and Google Classroom, images can be added directly. Images should then be deleted from the device memory. Teachers are encouraged to consider the need to upload images preferably for teaching and learning purposes
- Photos taken for use on social media, school promotion or as an archive of special events for use later should be placed into our School Google Cloud Drive. This can be done either via desktop upload, or directly from School issued iPads/iPods/ChromeBooks. Images can then be removed/deleted from the device that took them in a timely manner.
- Google Drive will have different levels of access depending on each individual's need and responsibility.
- Images or video recordings of children must be kept securely. Hard copies of images with personal data alongside should be kept in a locked drawer and any electronic images should be in a protected folder with restricted access. Images should not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.
- External vendors will be subject to a third party vendor agreement to ensure that images are stored in a compliant manner, which will incorporate group image permissions.

### (iii) Using images

All students are photographed in September each year, and annually thereafter, for the purposes of internal identification. These photographs identify the student by name, year group, house and form/tutor group and are held on iSams with password protected access by staff.

A No Photograph Register has been produced each year with up to date likenesses, outlining the students who are not allowed to be photographed/put on social media. This is sent, via a link accessible only to those in a @britishschool.sch.ae domain, to each Year Group and Specialist Department including the Head of Communications.

## How Our School Uses Digital Media

Although the following is not an exhaustive list, some of the main purposes for which our school may use digital media include:

- Educational Displays around School
- Features in local media
- School prospectus
- School website
- Display screens within school
- Official school social media channels
- School magazine

## Use of Student Images in School Publications

Unless the relevant student or his or 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 for marketing and promotional purposes, including:

- on internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;
- in communications with the School community (parents, students, staff, Governors and alumni) including by email, and by post;
- on the School's website and, where appropriate, via the School's social media channels, e.g. X (formerly known as Twitter) Facebook and Instagram. Such images would not normally be accompanied by the students full name;
- in the School's prospectus, and in online, press and other external advertisements for the School. Such external advertising would not normally include students' names.

All digital media by closed circuit televisions shall be processed in accordance with our school's CCTV Policy.

## Use of Student Images in portfolios of work (Seesaw, Google Classroom)

- Teachers, support staff and students should utilise School iPads/iPod Touch/ChromeBooks in order to update students' portfolios with examples of work and special events that celebrate achievement, with teachers, parents and students

following the guidelines set out in the Seesaw sign up letter (Appendix 1 – Seesaw Sign up letter) and through Google Classroom.

- Although students are able to upload photos to their accounts, they should be approved by a teacher before their work goes live.

#### (iv) Consent

If consent is withdrawn, the school shall take the following actions:

- For a School prospectus, consent can be withdrawn at any time and the images replaced at the next annual publication of the prospectus.
- For the School website, consent can be withdrawn at any time and the digital media replaced at the next annual review of the website.
- For the School managed social media accounts, consent can be withdrawn at any time and the digital media removed within [30] days.