

SIS POLICY MANUAL

450-2: DATA PRACTICES: PHOTOGRAPHS & VIDEO USAGE

CREATED	EFFECTIVE ON	REVIEWED	NEXT REVIEW
March 18 th 2024	August 1 st 2024		

Purpose: Student Photographs should be taken for school-related purposes only and uploaded to the school-managed, password-protected SmugMug account.

Consent: As part of enrolment, families consent to school staff taking and sharing photos through official school channels. This process should include information on how the photographs will be used and where they will be stored. This consent will be renewed each year as part of the re-enrolment process.

Open Apply Enrolment Consent

Consent to Use of Student Image in External Communications

Yes, I give my consent.

No, I do not give my consent.

Throughout the school year, we take photos at various events and in classrooms to document our community's activities. We use these images in our yearbook, school newsletters, and on our website. Additionally, we share photos on our social media platforms and in promotional materials to highlight our school's vibrant environment and educational activities. These photos are stored in our password-protected school registered Smugmug account.

Should you decide to withdraw this consent, please get in touch with our admissions office immediately.

Data Minimization: The photographs should be deleted from personal devices once uploaded to SmugMug.

Access: Photographs stored on SmugMug are limited to authorised staff only. When it is necessary to share photos outside of SIS staff, only individual folders will be shared and then directly to the parents who want to view the photographs. Examples include G12 Graduation, PYPX, Grade 5 Moving Up Ceremony, Student Performances, etc.

Occasionally, students will request photos either from the same or another division. An example of this is the annual calendar that is created as a student initiative. For requests like this, the Comms team will pull photos from SmugMug and share them directly with the student group through a SmugMug folder or Sharepoint.

Data Sharing and Transfers: Photographs and videos are shared with third parties, including external partners, for SIS promotion. External partners include business chambers, Summer Programme providers, third-party PD providers, etc.

Data Subject Rights: Under the GDPR, families have the right to request access to photographs of their child, request corrections, object to specific images being used, and delete images.

Retention Policy: Photographs are kept in secure folders indefinitely and will generally follow the exact timelines for student enrolment and transcript files.

Incident Response: Incidents related to a breach of access or use of photographs/video will be reported to the DPO, IT Helpdesk, and Comms.

Policy Review and Update: This usage policy should be reviewed regularly to ensure ongoing compliance with the GDPR and to reflect any changes in SIS's practices or legal requirements.

Training and Awareness: Training will be provided during the annual orientation and when new employees are onboarded throughout the year to ensure an understanding of the usage policy, the importance of GDPR compliance, and each person's respective roles in protecting individuals' privacy.