

FOUNDED 1900

THE ENGLISH SCHOOL

A SECOND CENTURY OF EXCELLENCE

Photography Policy

The English School

The person responsible for the Policy	GDPR Consultant
Ratified by	The English School Board of Management
Version Number, the last date updated	October 2026
Date Approved	2nd November 2026
Review Period	Two years
Next Review date	October 2028

Contents

1. General 2
2. Instructions for photographing and video-recording made by the School 3
2.1 Taking crowd photos or videos 3
2.2 Photographing small groups of individuals 3
2.3 General instructions for people taking pictures and / or videos 4
2.4 photos and video recordings for administration purposes 4
3. Guidance on Publishing Photos / Videos 5
3.1 Small-scale Publicity 5
3.2 Large-scale publicity 5
3.3 Duration of consent 5
3.4 Publication of data together with photographs 5
3.5 Photography relating to official School roles 5
4. Sharing photos with the Press and TV media 6
5. Guidelines for photography/video-recording by parents and guardians or third parties 6
Guidelines on the safeguarding of minors 7
Security and retention period for audio-visual material 7
Data subjects exercising their rights 7
Appendix 1 - Model Consent Form 8

1. General

Photographs and video recordings in which individuals are identifiable constitute Personal Data and must be processed in accordance with applicable data protection legislation, including Regulation (EU) 2016/679 (the "GDPR") and the Cyprus Data Protection Law 125(I)/2018. Particular care is required where photographs or video recordings depict children, taking into consideration both data protection and safeguarding requirements, particularly where such material is published online or through social media..

The English School ("the School") in the context of the promotion of students' curricular, extracurricular and School-related activities as well as achievements, collects audio-visual material in the form of photographs and videos. This audio-visual material is mainly published for:

- information purposes through the School's website, prospectus and other School publications;
- communication and promotional purposes relating to the School and students' activities and achievements; and
- publication through the School's official social media channels and other authorised online platforms.

There are instances that the photos of staff and students are captured but are not published globally on the internet. These cases are:

- Staff photos for ID Cards and CCTV images for security purposes
- Photos of students posted on classrooms notice boards, Plasma TVs for internal communication
- History photos in frames in teacher's or admin staff offices, conference rooms as part of School's rich heritage

The School in compliance with the General Data Protection Regulation has established this policy to protect the personal data of individuals appearing in the photographs and video materials and to ensure that the creation, processing and publication of the audio-visual material is in compliance with the Regulation and therefore the rights and freedoms of the persons depicted are protected. This Policy forms part of the School's wider data protection and safeguarding framework and should be read in conjunction with the School's relevant data protection, safeguarding, information security and other applicable policies and procedures.

2. Instructions for photographing and video-recording made by the School

This policy does not cover instances where students, parents and staff take pictures at School's events for their private use, although specific guidelines are provided in this policy and in associated policies of the School (e.g. mobile phone policy).
In other instances that photos are taken for specific School purposes, as described in the "General" section of this policy, then the following principles apply:

2.1 Taking crowd photos or videos

This photography / video-recording is usually done from a distance, including a large number of people who have a similar body posture (for example, sitting on stands of a stadium, running together, etc.). Where individuals cannot reasonably be identified from the photograph or video recording, the material will not constitute Personal Data. Where individuals remain identifiable, the School may process such crowd photographs or recordings on the basis of its legitimate interests, where appropriate, taking into account the nature of the event, the reasonable expectations of attendees and the rights and freedoms of the individuals concerned.

In any case, where the School is organizing large events, it will announce/advertise that the event is video-recorded and covered by a photographer or the media, and the material will be published online or on television. In such a case where there is no disproportionate effort by the School or by the organizers involved, a "photography free-zone" and / or a "red carpet" space will be created so that only those who freely agree will be photographed..

2.2 Photographing small groups of individuals

Images of small groups of children are likely to identify the students depicted and fall into the definition of personal data. Therefore, such video and photographic material must be dealt with in accordance with the Regulation.

Photos or videos where individuals are not identified.

Example: a photo that 2-3 children run with the ball, but you do not distinguish their faces, the photo shows their back, hands cover the face, it is a little blurred or with indistinct facial features.





Photos where individuals are clearly identifiable
Photos that identify children will be processed and published in accordance with the guidance in section 3 below.

Face identification from a photo can be made from the face of the person being primarily depicted as well as from the following identifying information:
Name on a t-shirt
School logo, team logo at the chest or elsewhere in the outfit
Other identifiers (Form,

Snapshots or close shots with one or two students clearly identifying their faces or the above identifying information fall into the category of clearly identifiable individuals.



2.3 General instructions for people taking pictures and / or videos

As explained above, photos and videos are considered to be personal data and fall into the Regulation. For this reason, the means used to process such data must be appropriate to assure the safeguard of the photographic or video data. Cameras, smart mobile phones, tablets or other media used for capturing must have the approval of the School.

All photos must be removed from the capturing/processing media and stored in the School's Servers. Any person appointed by the School to take photographs should be aware of and comply with this policy.

Where an agency or freelance photographer is engaged by the School to take professional photographs or recordings on its behalf, the School will ensure that the appropriate lawful basis applies and that the photographer acts in accordance with the School's instructions and applicable data protection and safeguarding requirements.

Any photographer appointed to capture images on behalf of the school should notify the data subjects (photograph subjects) in the most appropriate way his/her identity and for who he/she is acting on behalf, his/her intention to photograph and the purposes served by the photography. He/she should also indicate the means by which the photograph may be published (School's website, social networks, newsletter, prospectus, etc.).

2.4 photos and video recordings for administration purposes

There are other occasions that individuals namely staff, students, parents and visitors, may be captured in images/videos by the CCTV system of the School when on the campus. These images are subject under a different policy (CCTV policy) and processing is performed under the legitimated interests of the School to safeguard the people and assets. The same exists for photos of Staff printed on plastic ID cards.

3. Guidance on Publishing Photos / Videos

3.1 Small-scale Publicity

If the photos will not be published on the internet and will only be used inside the school or in a printed media of the School (prospectus, announcements, internal communications) addressed to the student and staff community (clubs, societies, forms), then the School uses as a legal basis its legitimate interests.

In such a case, the subject displayed on the video or photo has the right to object. Such objection request must be submitted in writing. The School may not be able to satisfy this right when it requires disproportionate effort and costs (e.g. printed and distributed prospectuses, which are particularly difficult to recall).

3.2 Large-scale publicity

If the photos are published on the internet (website, social networks) and depict individuals (students, parents, school staff) who are clearly identified, then their consent is required. For students under the age of 14, consent will be obtained from the parent or guardian. For students aged 14 and above, the School will obtain the appropriate consent in accordance with its established consent arrangements, taking into account the student's age and maturity and applicable data protection and safeguarding requirements. This consent is obtained by the Admin Office during Registration of students and upon recruitment for teaching and admin staff before any images are published. A template of the consent form is given in Appendix 1.

3.3 Duration of consent

As most children will the School for seven years, it is sensible to get consent for the whole seven-year period. Although this usually means that consent renewal is not required, the administration of consent is important to capture any changed circumstances, i.e. consent withdrawal either by students or parents/ guardians. For this reason, consent forms are kept centrally.

Following staff and students leaving the school, the school will have a right to use already printed material, for example, prospectus etc. for two years following the students and staff's departure. Following that they will never be used again for publication purposes.

3.4 Publication of data together with photographs

When the achievement of a student or group of students (academic, athletic or other) is to be promoted online, captions may be used when posting an image. The consent form signed by the parents and students covers this. Except in the cases mentioned in 3.5. below. No other personal information (email, phone) will accompany the photo. If for any reason student details are published, the photo will not be published. Online profiles of students or teachers will be only published for specific purposes and with explicit consent describing specifically the reasons, duration, personal data to be published, etc.

3.5 Photography relating to official School roles

It is understood that the Board of Management members, the Headmaster and the Senior Management Team of the School enjoy wider publicity among the academic society and for this reason, it is expected that they are likely to appear in images published by the School more frequently (e.g. graduation ceremonies, students parents' events, biography or interviews). For this reason, the School may rely on its legitimate interests, where appropriate, to publish photographs and videos relating to their official roles and School activities, including the following personal details according to the occasion: profile photo, name, surname, short academic biography. Upon departure from the School, current profile photographs and personal

information relating to the individual's official role will be removed from active publication, where appropriate. However, photographs and other audio-visual material relating to past School events, graduation ceremonies and other activities may remain within the School's historical archives in accordance with the School's legitimate interests and applicable retention requirements.

4. Sharing photos with the Press and TV media

The School, in the context of promotion and information, may share photos with the local media in order to provide more information to the public. In such a case, the School will only share material for people who have so consented. If the consent is withdrawn, the photographic material containing the subject that consent was withdrawn may not be withdrawn immediately. But the School will, in any case, take all measures to inform the recipients of the material.
Media in the context of their journalist role can use photographic material to inform the public. The School will not share with any media material for which consent has not been obtained from those depicted, except in case of a crowd or non-identifiable individuals.

For award-winning students of outstanding performance or other similar achievements who are photographed during the award of a prize, the School will ensure that the appropriate lawful basis and applicable consent arrangements have been established. Due to the fact that at the award ceremony, there may be other media covering the event, the School will inform the participants in advance and especially the parents or guardians.

The School will also require the professionalism and compliance of journalists and professional photographers with their codes of conduct and the Regulation.

5. Guidelines for photography/video-recording by parents and guardians or third parties

In all the above cases, especially during the graduation ceremony and / or other events at which parents and friends of students attend, it is expected that these parties will photograph or video-record their own children/friends or other children. This is permissible, and the School has no objection. However, the disclosure of material captured by parents and third parties beyond private /home use is prohibited and would appropriately be communicated to the public. For example, video-recording and selling video of the event by third parties is forbidden.



For this purpose, everyone will be notified/alerted before the start of the or event (e.g. by invitation) that any photograph or video taken by third parties will be strictly for private use otherwise, it falls under the Regulation.

Guidelines on the safeguarding of minors

The direct or indirect risks associated with web images depicting minors are known. To prevent such risks and to ensure the protection of minors' data and subsequently their rights and freedoms, the School implements the following rules:

- All children who appear in School's photographs or videos that are posted online or shared with other media will be suitably dressed, with School uniform, or at least with a t-shirt, short pants and high socks for sports photos
- The video or photos will focus on the activity, and portrait photography or video recording of an individual child will be avoided.
- Photographs should not exclude or discern children about their ethnic origin, gender or some features (e.g. glasses)
- Avoid photos showing jewellery or tattoos identifying subjects

In events organised by the School, participants and parents should be informed that if they have concerns about inappropriate or intrusive photography/filming, these should be reported to the School officials and recorded in the same manner as any other safeguarding concern. Furthermore, where third parties are taking photos (parents or other spectators), School Officials could approach and challenge any person taking photographs and ask for their identity and registration (if appropriate). They might need to refer it to the police if this person continues to record images unauthorised or inappropriately.

Security and retention period for audio-visual material

Regarding any material that the School has obtained consent for, it shall process it and make it public for a period due to interest from parents and graduates in their after school life this will be kept online for a maximum of 4 years from the date of its initial acquisition, and then delete it.

If it intends to continue to portray the material on the Internet, then it shall receive new consent from the persons or parents/guardians. Consent forms and the material will be stored in the same file as the date to make it easy to delete or renew the consent.

Through its long history, the School has created a rich and valuable historical record of photographs mainly and wishes to continue to enrich it with photographs of its modern history. Thus, for audio-visual material which will be kept for historical purposes and exclusively for the record of the School, consent will not be obtained, but the subjects will have the right to object to this legitimate interest of the School.

For all material, and in particular, for material intended for historical purposes, all technical and organizational measures will be taken to ensure that the printed material remains unchanged from deterioration, but also protected from threats of loss or unauthorized access as per Data Protection and Information Security policies of the School.

Data subjects exercising their rights

The rights of individuals depicted in photos processed by the School vary depending on the legal basis the School adopts to process such personal data. All subject data rights and legal bases for personal processing data including photos and videos are described in the Data Protection Policy of The English School.

Appendix 1 - Model Consent Form

Parent or guardian name _____

Child name: _____

Through each academic year, The English School ("School") is organising a large number of activities, events, ceremonies as part of the unique educational experience and opportunities available to our students. These events most of the times are covered by photography and / or video recording for the purpose of promoting these events, informing the public and keeping records of the historical record of the School.

Occasionally, the School staff or an appointed professional photographer undertake to capture photographs or video recordings of students on campus and at extracurricular events. This audio-visual material can be used in School publications or online such as the School website, social networks, and prospectuses and also on some occasions forwarded to Cypriot and foreign media for television, newspapers publishing.

Under General Data Protection Regulation 2016/679 and Law No.125 (I) 2018, our obligations as Data controllers are to process such material lawfully, and we will put every effort to protect individuals' rights and freedoms. For this reason, the School requires your consent for processing photos and videos for the below purposes. Please read the following notice carefully and place your initials in the box next to your preferred statement.

I, the parent/guardian of the above-mentioned student, agree with the School to publish and use any photos or shots in videos that may portray my child:

☐ School's social media (Facebook, Instagram, etc.)
☐ School website
☐ Printed promotional material of the School (e.g. prospectus)
☐ Share the photos or video material with media from Cyprus and abroad to promote events

You have the right to withdraw your consent at any time by calling the School at tel 22799300 or by writing to info@englishschool.ac.cy. You are hereby informed that the withdrawal of consent will not affect the legality of any publication made before you withdraw your consent.

The School will take all technical and organisational measures to ensure that images/videos are used solely for the purposes intended. If, at any point, you realize that these images are being used in a way that is inconsistent with the above, please inform the School immediately.

It should be noted that the School is taking measures to ensure the rights and freedoms of individuals who are likely to be depicted in the images collected through the Photography Policy. According to this policy, School is not responsible for any photos and videos were taken for "personal use", as it cannot control the capture and use of such images by relatives, friends or other viewers who will possibly post them on social networks. However, the School retains the right to restrict such activity where it considers that safeguarding issues arise.

I have read the above and agree

Signature:

Parent / Parent's Name: Date: