



# BSA Group Services LTD

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## Photography policy



**bsa** | GROUP  
baisis bsa hieda sacpa tiob



**bsa** | BOARDING  
SCHOOLS'  
ASSOCIATION  
Part of the BSA Group

**sacpa** | SAFEGUARDING AND  
CHILD PROTECTION  
ASSOCIATION  
Part of the BSA Group

**baisis** | BRITISH ASSOCIATION OF  
INDEPENDENT SCHOOLS  
WITH INTERNATIONAL STUDENTS  
Part of the BSA Group

**hieda** | HEALTH IN  
EDUCATION  
ASSOCIATION  
Part of the BSA Group

**bsa** | GROUP LEGAL  
SERVICES LTD

**tiob** | THE  
INSTITUTE  
OF BOARDING  
Part of the BSA Group



# Photography

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## policy

### 1. Introduction

The BSA Group comprises entities owned all or in part by The BSA Group Services Limited, a company registered in England and Wales with registration number 4676107 and whose registered office is at 167-169 Great Portland Street, 5th Floor, London, W1W 5PF.

As of November 2022, the entities in the BSA Group Services Limited are the Boarding Schools' Association (BSA), the British Association of Independent Schools with International Students (BAISIS), the Safeguarding and Child Protection Agency (SACPA), Health in Education Association (HIEDA) and The Institute of Boarding (TIOB) (company number 13042473).

The BSA represents over 600 independent and state boarding schools in the UK and internationally. BSA services include professional development, government relations, communications, media, publications, conferences and events.

## 2. This policy

The BSA Group takes the safeguarding, privacy, and data protection of individuals seriously. As a person may be identified or identifiable by their image, the collection and use of photographs where this may be the case is governed by data protection law.

To commit to the highest standards of safeguarding and data protection, the BSA Group complies with a strict photography policy. This policy is intended to provide information to staff, pupils and parents, carers or guardians (referred to in this policy as “parents”) at BSA Group member schools about how their images are normally used by the BSA Group. It also covers the BSA Group’s approach to the use of images of attendees at BSA Group events (including those held virtually).

It should be read together with: (a) any other information the BSA Group may provide about a particular use of images, and (b) more general information about our use of personal data, e.g., in the BSA Group’s privacy notice.

## 3. Permission

The BSA Group will seek permission, or have a member school seek permission on the BSA Group’s behalf (see Appendix 1), from the individual (if over 12 years) or their parent (if under 12 years) before a photo of the individual can be taken or used.

Under ordinary circumstances, full names of individuals will not be linked with an image. This is strictly applied in relation to images of children for safeguarding reasons, unless consent is given otherwise. Where an individual’s name is integral to the story (for example award presentations), BSA places the onus on the member school/organisation to gain consent from the individual before publication.

For images taken by a BSA Group representative at an event, all attendees will be asked before the event if they consent to having their photos taken, and a photo consent form will be provided. The BSA Group will collect completed consent forms and check them before any photographs are taken.

This consent remains “live” unless revoked by the individual or their parent as appropriate. Consent can easily be withdrawn by emailing:

**BSA:** [BSA@boarding.org.uk](mailto:BSA@boarding.org.uk)

**BAISIS:** [baisis@boarding.org.uk](mailto:baisis@boarding.org.uk)

**SACPA:** [info@sacpa.org.uk](mailto:info@sacpa.org.uk)

**HIEDA:** [info@hieda.org.uk](mailto:info@hieda.org.uk)

In cases where consent is withdrawn, online photos and stories will be removed as far as possible. Photos and stories that have been used in print publications cannot be removed once printed but will not be included in any reprint of the publication.

For images where individuals are not easily distinguished (such as photos taken from a distance or at the back of a room, where no faces/identifiable features are visible), no permission will be sought. These images do not amount to personal data and consent is not needed.

The BSA Photography Consent form [can be obtained here](#), or by emailing [BSA@boarding.org.uk](mailto:BSA@boarding.org.uk).



#### 4. Online and social media use

The BSA Group publishes photos online from three sources:

- Images provided as part of a press release from a member school for promotion via the BSA Group websites
- Images provided to or taken by the BSA Group when attending member school events, and
- Reposts of member school/organisation images as part of our commitment to promote the benefits of boarding education.

For images taken by the BSA Group, all individuals (including parents and pupils) will be made aware that photos will be taken on the day, and member schools will be provided with the BSA Group photo consent form to distribute to parents and pupils. Images may be posted on the internet including, but not limited to, the BSA Group's Twitter, Facebook, Instagram, LinkedIn, YouTube and other social media and online accounts.

For images shared with the BSA Group by our members, the BSA Group will repost those from schools that have provided pupils at the start of the academic year with a photo consent form which includes consent for third party use, or have provided students with a consent form for that particular image.



#### 5. Video recordings

The BSA Group makes recordings of webinars and virtual training sessions in order to distribute these to attendees and other member schools for training and learning purposes. Attendees are informed of this prior to the session.

#### 6. Photo security

The BSA Group takes appropriate technical and organisational security measures to ensure that images held by the BSA Group are kept securely on its systems, and protected from loss or misuse. The BSA Group will take reasonable steps to ensure that members of staff only have access to images of pupils of member schools where it is necessary for them to do so.

All BSA Group staff are given guidance on the importance of ensuring that images of individuals (particularly pupils) are made and used responsibly, only for BSA Group purposes, and in accordance with the law and this policy (and related policies and notices).

## 7. Photo retention

Photos provided to the BSA Group by member schools for use in printed publications (such as the Boarding School Magazine or BSA Group marketing material), will be kept in BSA Group records for a period of three years. The BSA Group will not share photos with any third party. If a photo is to be used in another publication, and reuse permission had not been previously granted, the BSA Group will contact the school for reuse permission. If an individual wishes for the BSA Group to remove a photo from our records, they should email their request to [BSA@boarding.org.uk](mailto:BSA@boarding.org.uk).

Photos on the BSA Group websites (generally accompanying press releases) will normally be kept live on the website for a period of ten years as part of our commitment to promote the ongoing excellence of member schools. If an individual, parent, or school wishes for a photo or press release to be removed, they should email their request to [BSA@boarding.org.uk](mailto:BSA@boarding.org.uk).

Images reposted on social media will remain as part of the BSA profile indefinitely. If an individual wishes for their images to be removed, they should email their request to [BSA@boarding.org.uk](mailto:BSA@boarding.org.uk).

We hope you will feel able to support the BSA Group in using images to celebrate and promote the work and achievements of the BSA Group and its member schools.

### Appendix 1

For schools:

Please include the below within photography consent forms

I consent for my/my child's photo to be used by third party organisations (including the Boarding Schools' Association Group), which support and promote the School, through the re-publication of media releases provided by the School in printed and online publications and social media platforms. I am aware that I can ask the School what third party organisations have republished the photo and can withdraw my consent at any time in the future (circle appropriate):

**Yes / No**

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VAT Registration no: GB 809 7054 18