



Photography & Videography Privacy Notice

Approved by:	Effective date:	Next review:
Marketing & Communications	04 November 2024	04 November 2027

Privacy Notice Statement

The photography and video privacy policy provides a framework to ensure the University meets its obligations under the UK General Data Protection Regulation and the Data Protection Act 2018.

Who needs to know about this Privacy Notice

This policy applies to all the processing of photography and videography data belonging to students, prospective students, staff, visitors and customers carried out by the University, including processing carried out by joint controllers, contractors and processors.

Purpose of this Privacy Notice

Canterbury Christ Church University captures photography and video of activities on and off campus for recruitment, retention and reputational purposes including to:

- Ensure current students know what services and support are available to them.
- Promote the University's courses, research and other activities to potential UK & International students.
- Share news, events, opportunities and successes with current students and staff to support community building and sense of belonging.
- Build reputation and raise awareness of the University's activities and impact with the public, policy makers, benefactors and other external stakeholders.

This Privacy Notice must be read in conjunction with the [Social Media Staff Policy](#).

Responsibilities

The University has overall responsibility for ensuring compliance with relevant legislation and effective adherence to this Privacy Notice.

Day-to-day management responsibility for deciding how photographs and videos will be taken and processed and keeping this Privacy Notice up to date sits with the Marketing and Communications department.

They can be contacted at: corporatecommunications@canterbury.ac.uk

Contact

If there is anything you are unclear about, you can contact our [Information Governance team](#). The Team is happy to answer any queries you may have about this Notice or how we process your data.

You can also contact the University's Data Protection officer:

Email: dp.officer@canterbury.ac.uk

Address:

Governance & Legal Services
Invicta House
North Holmes Road
Canterbury
CT1 1QU

If you feel that your data has not been managed correctly, or you are unhappy with our response to any requests you have made to us regarding using your data, you have the right to make a complaint to the Information Commissioner's Office. The contact details for the ICO are:

Website: www.ico.gov.uk

Address:

The Information Commissioners' Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Contents

Privacy Notice Statement	1
Purpose of this Privacy Notice	1
Responsibilities	1
Contact	2
1. Where may we take photographs and videos?	4
Events	4
Lectures, Seminars & Teaching Spaces.....	4
On campus.....	4
Photo shoots	4
2. Where do we publish the photographs and videos we take?	5
3. The lawful bases we use to process your data	5
Legitimate Interest	5
Consent.....	6
4. Who do we share your personal data with?	6
5. How we protect and store your personal data	7
6. How long do we keep your data for?	7
Version control	9
Appendix 1	10

1. Where may we take photographs and videos?

1.1. The University captures photographs and videos in various settings. In this section we outline the occasions we may do so.

Events

1.2. Photography or videography may be undertaken at an event organised by Canterbury Christ Church University. These include annual events such as Open Days and the Freshers Fayre. It also includes events listed on the [University](#) and [Student](#) Events Hub.

1.3. If you're attending an event at which photography or video recording may take place and you do not want to be included, please let the photographer/videographer and/or a member of the university staff know. . They will ensure that they do not capture or retain any images or footage of you.

1.4. For information on photography and videography at our graduation events, please read our [Graduation Privacy Notice](#).

Lectures, Seminars & Teaching Spaces

1.5. There is a separate [Digital Learning Capture Policy](#), which covers the digital capture of lectures and teaching content to ensure all students experience an inclusive curriculum.

1.6. Concerning photography or videoing to support recruitment, retention and reputation, permission from the teaching staff will always be sought, and prior notice to the class will be given via Blackboard and/or email. It will enable those who do not want to be included to let the photographer/videographer and/or a member of the University staff know so they can ensure that they do not capture or retain any images or footage.

On campus

1.7. Generic scenes of campus life may be photographed or filmed.

1.8. Photographs or images captured in these instances will be crowd or distance shots where an individual is not identifiable.

Photo shoots

- 1.9. The University may organise photoshoots in which models participate.
- 1.10. Photoshoots will be organised in advance, and any models involved will be required to complete the model consent form.
- 1.11. A copy of the model consent form can be found in [Appendix 1](#).

2. Where do we publish the photographs and videos we take?

- 2.1 The University published photographs and videos appear on a wide range of physical and digital mediums including:
- Print, for example: leaflets, prospectus and posters.
 - Digital, for example: on our [website](#), digital screens or shown in our video advertisements.
 - On our social media accounts: [Facebook](#), [Instagram](#), [X](#), [LinkedIn](#) and [YouTube](#).
- 2.2 Published materials with photo or video features are available to anyone with access to the web or printed materials.

3. The lawful bases we use to process your data

- 3.1 Data protection law sets out reasons for collecting and processing your personal data (this includes photographs and video). This section outlines the legal bases the University uses.

Legitimate Interest

- 3.2 In specific situations, we require your data to pursue our legitimate interests in a way that it is reasonable to expect as part of running the University. We do this in a way that does not materially affect your rights, freedom or interests.
- 3.3 We try to ensure that you are aware when photographing/filming is taking place and to minimise any impact on privacy. You can opt out of photography/filming at any time.
- 3.4 We may process your data under this legal basis when it is beneficial to the University.

- 3.5 The legislation relating to processing data under this lawful basis can be found in UK GDPR, Article 6(1)(f):

(f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”

Consent

- 3.6 We may include you in photos and videos where we have your consent to do so.

- 3.7 There may be instances where you are the primary subject of the image/video or are being paid to feature. In these instances, we will seek your consent via the Model Consent Form (Appendix 1). For us to collect your consent, we will also need to collect and process the following information:

- Full name
- Address
- Contact telephone number
- Email address
- Your signature

- 3.8 We will only use your personal data collected under consent for the purposes in this Privacy Notice.

- 3.9 You can withdraw your consent at any time by contacting corporatecommunications@canterbury.ac.uk and do not need to give us a reason.

- 3.10 The legislation relating to processing data under this lawful basis can be found in UK GDPR, Article 6(1)(a):

(a)the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

4. Who do we share your personal data with?

- 4.1. We may disclose your information to our third-party service providers. It is to provide services to us or directly to you on our behalf. For example, this may

include:

- Freelance designers
- Printing providers
- Digital asset management suppliers

4.2. When we use third-party service providers, we provide them with the minimum amount of personal information necessary for them to provide their service.

4.3. Whenever we share information with a third-party, we ensure there is a data-sharing agreement in place to ensure that your information is secure and only used for the purposes for which it was collected.

4.4. For more information about our third-party providers, please read our [Data Protection Policy](#).

5. How we protect and store your personal data

5.1. We know data security matters, so we treat your data with the utmost care and take all appropriate steps to protect it.

5.2. We are committed to the data protection principles of good practice for handling information and holding all personal information securely. We will only transfer data within the University on a need-to-know basis.

5.3. We store the information you provide on our secure servers or our cloud-based systems within the European Economic Area (EEA).

5.4. However, there may be times when we need to store information outside the EEA. Should we transfer your information outside the EEA, we take appropriate security measures to protect your privacy rights. It would be by imposing contractual obligations on the recipient of your personal information or ensuring the recipients subscribe to 'international frameworks' that aim to provide adequate protection.

6. How long do we keep your data for?

6.1. The University will retain your image in line with our retention schedule and for no longer than necessary.

6.2. If your photography/video is processed under 'Consent' and you withdraw your consent, we will stop processing your personal data immediately and destroy copies of photography and videos that we hold of you. You can

withdraw your consent at anytime by contacting corporatecommunications@canterbury.ac.uk and do not need to give us a reason.

- 6.3. If your photography/video is processed under 'Legitimate Interests' and you submit a 'Request for Erasure' ('the right to be forgotten'), we will endeavour to remove published copies of photograph and videos from our platforms. You can submit a request for erasure at any time by contacting information.governance@canterbury.ac.uk . You do not need to give us a reason. We will assess your request and respond within a calendar month.
- 6.4. Kindly note that if your personal data (photograph) appears in printed publications, we cannot destroy material that has already been published. However, we will stop using your personal data in subsequent printed publications.
- 6.5. Should you consent to your personal data (including photograph or video) to be published on our social media platforms or website, we cannot retrieve and destroy copies if your personal data has been copied from the original publication and reused by a third-party.

Version control

Document Information	Description of Document Information	
Document Title	Photography and Videography Privacy Notice	
Department Owner	Marketing and Communications	
Document Category	Category: Governance	Description of category: Documents relating to the governance of the University
Document Owner(s)	Chief Marketing Officer	
Document Manager	Head of Student Communications Head of Data Protection	
Related University Policies	Data Protection Policy	
Related University Procedures	N/A	
Approved by	Chief Marketing Officer	
Date Approved	04 November 2024	
Date of Commencement	04 November 2024	
Review Date	November 2027	
Version	Version 1.0	
History of Revisions of the Document	Version 1.0 – Privacy Notice created	
Web Address	https://www.canterbury.ac.uk/services/governance-and-legal-services/data-protection/privacy-notices	

Appendix 1



Canterbury Christ Church University (CCCU) Model Release Form

I hereby consent to the use of still images (photographs), and / or moving images (video recordings), and / or audio recordings, and / or quotations, of/by me taken by CCCU employees, students or anyone else authorised by CCCU to do so.

I consent for such material to be used by CCCU or anyone else authorised by CCCU in publications, displays, exhibitions, or other publicity material including but not limited to:

prospectuses, annual reports, internal newsletters, advertisements, website and social media sites, external advertising

worldwide, in perpetuity, via electronic or printed means or any other means which may be developed in the future with any reasonable retouching or alteration.

I hereby release and discharge CCCU and anyone else authorised by CCCU, from any and all claims and demands arising out of or in connection with the use of the photographs, video or audio recordings, including without limitation any and all claims for invasion of privacy and defamation.

I understand that I have no interest in the copyright or any moral rights in the photographs, video or audio recordings.

I understand that my participation is entirely voluntary **and that I will not receive payment or benefits in kind from CCCU relating to my participation [Remove red text if the participant is receiving payment].**

I understand that this release shall be binding. No modification of this agreement shall be of any effect unless it is made in writing and signed by all of the parties to the agreement.

For the Model:	For CCCU (the commissioner of the work):
Signed:	Signed:
Name (printed):	Name (printed):
Address:	CCCU Address:
Contact Tel/Email:	Contact Tel/Email:

Date:	Date:
-------	-------

The photographs, video and audio recordings that CCCU hold will only be used for the purposes stated above and will be processed in compliance with the provisions of Data Protection Legislation and any subsequent legislation. Please see our Privacy Policies on our website for more details: www.canterbury.ac.uk/privacy. You may withdraw consent at any time by contacting the Department of Marketing and Communications Director Marco Keir: marco.keir@canterbury.ac.uk