

Somerville College

Photography Policy and Procedure

The college carries out photography and filming for a number of purposes, such as:

- to promote Somerville's research and teaching to prospective students and employees
- to strengthen our bonds with current students and alumni
- to advertise our commercial activities
- to create a permanent record of college activities for our archives

1. Data Protection Legislation

Any filming or photography that we do as a college is data processing and if it includes identifiable individuals (data subjects) then it is regulated by data protection legislation. Our legal basis for such processing (which includes storage) is our public task of educating students and our legitimate interest in running a self-funding college.

We do not rely on consent for processing images and therefore we would not normally ask for specific consent from individuals to take or use their image. Nonetheless, data subjects do have a **right to be informed** that we may use their image (see below section 4) and have a **right to object to our use of their image**.

The right to object does not mean that we have to remove their image in all circumstances. Should a data subject object to us holding their image and using it for our legitimate purposes, please notify the data protection team immediately (dpo@some.ox.ac.uk).

2. Commissioning Photography

Any photographer commissioned by the college or its employees to photograph the college, its members or guests, should sign a contract with the college. The contract should include clauses on data protection, confidentiality and copyright and compliance with Somerville's Photography Policy and Procedure. If the photographer does not have their own contract, the standard Somerville Confidentiality Agreement for Photographers should be used. Any new contract issued should be sent to the DPO to ensure it is compliant before it is signed.

3. Non-commissioned photography

Any requests from outside college, to film or take photographs within Somerville, should be referred to the communications team and must be approved by the Treasurer. There may be a charge for this permission.

4. Informing subjects

In order to ensure data subjects are properly informed of our data processing (ie the retention and use of their image), the following procedures should be observed:

- Email attendees of our events in advance referring to the relevant privacy notices
- Display prominent notices at events regarding photography and filming activities
- Offer opportunities for individuals to avoid being in photographs or films (through the wearing of badges etc)
- Ensure students and employees have read their respective privacy notices
- Keep our privacy notices under review to ensure they cover the processing of images

5. Photography of Children

We rely on the same legal bases to photograph children as well as adults but additional safeguards should be in place:

- Information (see section 4) should be shared with the parents/ guardians as well as the child data subjects
- Children must be offered the opportunity to opt out of being photographed
- Photographs should not be taken unless the child is supervised by a responsible adult
- Photographs should not be used without the agreement of their parent or guardian/ carer (this is not consent as a legal basis but extends an additional courtesy to our visitors)

6. Storing photographs

Once a set of photographs or footage has been taken, it should be transferred to our secure drives and any files left on the recording equipment should be erased. The images should be reviewed and ones that will not be used should be deleted. Any images saved must have the metadata retained with them (to include date taken, event, named persons, photographer, what they have been used for and copyright restrictions). Details of how to do this are available separately.

7. Retention of photographs

Normally photographs should be reviewed after four years and those that are no longer in use should be passed to the archivist for further review before destruction or retention in the archives

8. Use of photographs and copyright

Photographs should only be used for Somerville's purposes, subject to copyright restrictions, and should not be shared with third parties directly or indirectly. In particular they should not be used by individuals in a private capacity on social media etc. If a third party requests a copy of a photograph this will be dealt with by the archives department and a fee may be charged. If there is any doubt about questions of copyright or sharing of images, the archives team should be consulted.