

Document Title	Code of Practice 10: Protection of certain categories of personal data – images and sound
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Relevant to	All academic and professional services staff and students

1. Introduction

- This Code of Practice covers the collection and processing of personal data in the form of digital or hard copy images (photographs, pictures or video or other types of image recordings, of people), and of sound (voice recordings such as speech, or conversation). It also covers podcasts (media files of moving images and / or sound).
- The University’s use of CCTV (closed circuit television) is specifically covered in a separate policy. Please refer to that for further information.

2. Photography

- When the University takes photographs of people, and those people are clearly visible and recognisable, permission will be sought for agreement to use the photograph, as far as possible. Where children are under the age of 18, parental consent will be sought.
- The University will have a clear purpose for taking the photograph, and will be clear as to who is likely to view it. The photograph may be for use in a paper publication, or on the website, for instance. Websites will be accessible to anybody throughout the world, and therefore photographs will not be placed on the internet without explicit (written) consent.
- Individuals whose photographs are being taken:
 - will be informed as to the purpose of the photograph,
 - told where or to whom it will be made available (in general terms),
 - will be asked for consent to use it in these ways (this may if necessary be via a consent form).
- If the photograph is of a large number of people, for instance it may be a public event, the photographer does not need to get permission from all parties, although he or she can still address those people within earshot.
- If photographs are taken for security reasons, for instance to be used on I.D. cards, this is a legitimate purpose for which consent does not need to be sought. If the photograph is then subsequently used for another purpose, consent should be sought (subject to the principles of Data Protection legislation). Images may

on occasion be supplied to the police for the purposes of their preventing or detecting a crime.

3. Other Types of Image Recording

- The same principles as are applied to our use of photography, will be applied to any other type of image recording, such as video, DVD, film, podcast.

4. Recording of Lectures

- Refer to the University's Lecture Capture Policy for information.

5. Sound Recordings

- Sound recordings may include those which accompany video recordings (in which case see all paragraphs above), or sound alone, such as the recording of conversation either in person or over the telephone or other electronic means.
- The University will not make any sound alone recording without informing all those involved that it is doing so, and the purpose will be specified. Permission may on occasion be sought if necessary. In some instances individuals will be assumed to have automatic knowledge of recording, in the case for instance of messages left on voicemail or answer-machine.
- Individuals, either in their private capacity or in their capacity as members of staff or students, or members of the public (including potential applicants to be staff or students), will not be allowed to offer recordings which they have made covertly, to support any instance of grievance, complaint, incident, disciplinary, appeal, application or suchlike. They should seek permission from the University to make any recording for any such purpose, prior to the event, and all participants in any such meeting, discussion or talk should be informed and will be allowed to refuse consent.