



Publicity Photography Policy

1. INTRODUCTION

1.1 Purpose

- This policy is to inform Norland College Limited ['Norland'] staff, students, and visitors of its approach to photography for publicity purposes.
- The use of photography for publicity purposes by Norland is governed by the Data Protection Act 2018.

1.2 Scope

- Publicity purposes can include print materials, digital platforms and websites, and third-party publications e.g. media pieces featuring Norland, where explicit use of imagery has been granted.
- This policy is relevant to staff, students, visitors, and any individual who is the subject of photography taken for publicity purposes.

2. POLICY

2.1 Requirements

- Measures must be taken to ensure that the rights of individuals are respected in the collection and use of photographs.
- Norland is required to inform individuals if an identifiable image of them has been captured and must secure their consent before it is used in publicity materials. This includes any photographs on show in a public area.

2.2 Photography

- In situations where any individual(s) can be easily identified in a photograph, consent must be sought in advance.
- The subjects should be told where and for what reason the photograph may be used and be given the opportunity to opt-out of the photograph.
- Photographs should only be used for the purposes for which they were collected.

2.3 Posed photography

- In the case of posed photographs, e.g. a Norland photoshoot, a consent form should be signed by each subject to ensure they have given appropriate consent.
- If children under the age of 18 are clearly recognisable in an image, consent from a parent or guardian should be obtained.



2.4 Event photography

- In the case of a group activity or event, individuals should be given advance notice of photography and the opportunity to opt-out.
- Where possible, a warning that photography may be taking place should be given in advance in writing, e.g. by email, through notices displayed at events or the inclusion of a sentence in printed programmes or publicity material.

2.5 Existing and older imagery

- In the case of old images where no-one shown in the image is still living, it does not fall under the provisions of the Data Protection Act.
- If there is doubt over whether individuals shown in the image are still alive, estimate their age at the time the image was taken and assume a lifespan of 100 years.
- In the case of existing images that still fall under the provisions of the Data Protection Act and for which no consent was sought at the time or there is uncertainty as to whether consent was sought, reasonable efforts must be made to gain consent.
- If it is impossible to trace the subject and gain consent, assess whether they were aware their photograph was being taken at the time and whether they could have reasonably expected it to be re-used by Norland.
- If use of the photograph could cause damage or distress to the subjects, either because of the way in which they have been photographed or the way in which the photograph is intended to be used, the photograph should not be used.

2.6 External photographers and third-party suppliers

- External photographers commissioned by Norland will own the copyright of the photography they create and will grant Norland full licence to use this photography in all formats and all channels in perpetuity.
- Where appropriate, Norland will reference this photography as copyright Norland / photographer's name.
- All external photographers will be accompanied throughout their visit by a member of staff who is fully briefed on Norland's responsibilities in relation to the Data Protection Act and the taking of photographs.
- For photographs supplied by third parties, whether an organisation, individual or an agency, the provider of the images must be able to confirm that any clearly identifiable individuals have consented to distribution and subsequent use of the photograph. It is Norland's responsibility, ultimately, to ensure that permission has been obtained.

3. CONTACT DETAILS

- If you have any questions relating to this policy, please contact: Marketing, Student Recruitment and Brand at Norland, York Place, London Road, BA1 6AE / marketing@norland.ac.uk



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