

Photography and Filming of Students Policy

DOCUMENT CONTROL			
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1. Purpose

Christian Schools Tasmania is a child-safe organisation and upholds a commitment to ensure the collection and use of participant photographs and/or film in the School;

- protects the personal information of individuals;
- respects the individual's right to control how and for what purpose their personal information is used; and
- complies with the relevant legislative requirements.

Photographs and filming may include the following:

- individual and class photographs to be taken each year;
- the collection, use and disclosure of other school-related photos, video, film and digital images that may be taken by the School from time to time;
- media used to take photographs and film the students;
- parents and students recording performances, activities and other activities endorsed by the School.

2. Scope

2.1. This Policy applies to the general collection, use and disclosure of photographs, video and recordings ('images') of students by the School. It does not cover the use of Closed-Circuit Television (CCTV). The use of CCTV is covered in our Video Surveillance Policy.

2.2. Photographs, videos or digital images of a student are considered 'personal information'; therefore, their use and disclosure are governed by the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles contained within it. Photographs, videos and digital images of students may also include copyright content and be governed by the Copyright Act 1968 (Cth) (Copyright Act).

2.3. This Policy statement applies to all staff, students, parents, carers, alums, volunteers, contractors, and any other school community members.

2.4. This Policy is aligned with the Australian Human Rights Commission National Principles for Child Safe Organisations.

3. Policy

3.1. Definition of terms for the purpose of this Policy:

- **The School:** refers to Christian Schools Tasmania (CST); an association of Christians who, through their Board of Directors, are legally responsible for Calvin Christian School, Channel Christian School, Emmanuel Christian School and Northern Christian School.
- **Photographs/Photography:** includes, but is not limited to, still cameras, mobile phones, mobile devices such as laptops, notebooks, iPads, GoPros, drones etc. or any form of device that captures still images.
- **Film/Filming:** includes, but is not limited to, video cameras, mobile phones, mobile devices such as laptops, notebooks, iPads, GoPros, drones etc. or any form of device that captures moving images.

3.2. Safeguarding Children and Young People:

CST has zero-tolerance for the abuse and neglect of children and young people. We are committed to the rights of all children and young people to feel safe and be safe when participating in our organisation's activities, services and programs. We will seek to keep children and young people safe by:

- only using images of children in appropriate clothing;
- avoiding full-face and body shots of children taking part in activities such as swimming, where there may be a heightened risk of images being misused;
- using images that positively reflect young people's involvement in the activity;
- reminding children, parents and carers who they can talk to if they have any concerns about images being shared; and
- when hiring an external photographer, we will:
 - provide them with a clear brief about appropriate content and behaviour;
 - not allow the photographer to have unsupervised access to children;
 - not allow the photographer to carry out sessions outside the event or at a child's home; and
 - reporting concerns regarding inappropriate or intrusive photography following our child protection procedures.

3.3. General:

- Images and filming used by the School and third parties will be monitored to ensure adherence to the School's Privacy Policy.
- All externally published media will be approved and published by authorised delegated staff.
- Images collected by the School are the property of the School, and individuals contained in the images have no ownership rights of such images.
- The School does not own or control any images of students taken by others (i.e. parents, students, guests, public, etc.) during school activities.
- The School retains the right to publish images of consenting individuals, as outlined in the Privacy Statement and Privacy Policy.
- The School's collection, use and disclosure of photographs, film and recordings will be in alignment with the Privacy Policy.
- If consent is not given to take photographs or video footage, we will respect the wishes of the parents and carers. We will agree in advance on how they will be identified, so the photographer knows not to take pictures of them, and ensure this is done in a way that does not single out the child or make them feel isolated.
- We will never exclude a child from an activity because we do not have consent to take their photograph.

3.4. School performances, sporting events and other school-approved activities:

- The School permits parents, students and guests to photograph, film or record School performances, sporting events and other school-approved activities.
- All photography and filming is to be undertaken from spectator areas only.
- Parents, students and guests who photograph, film or record school activities are requested to only do so for their personal use and not to publish the images in any form, including on social media, without the prior consent of persons whose children appear in the images.
- Note: the publishing of photos of students without their parental written consent on personal social media sites is a reportable offence. If parents wish to publish images of students other than their own children on their personal social media, they must have written consent prior to publishing the images.

- The School may impose restrictions on photography and filming at its discretion, which may include removing the rights to photograph or film. All restrictions must be adhered to at all times.

3.5. Images for use and disclosure within the school community and ordinary school communications:

The School may photograph, film or record students to use within the school community, including:

- to support assessment of students and provide feedback (i.e. filming student class presentations)
- in the School's communication, learning and teaching tools (for example, emails, online classroom forums that can only be accessed by students, parents or school staff with passwords);
- for display in school classrooms, on noticeboards etc.
- in the School's newsletters; and
- to support student's health and wellbeing (e.g. photographs of pencil grip to assist in OT assessments). Photography and Filming consent is collected on the Enrolment Application Form and parents and carers can update permission this at any time via Consent2Go.

3.5.1 Official school photographs: each year, the School will arrange for a professional photographer to take official school photographs of students. This will generally involve both class photos and individual photos being taken. Official school photographs may be:

- purchased by parents/carers;
- used for school identification cards; and
- stored electronically for educational and administrative purposes.

The School will notify parents and carers in advance of the school photographs being taken to give them an opportunity to discuss any concerns around including their children in the class or whole-school photographs.

Parents and carers who choose to opt out of having their child participate in official school photographs must contact the School before the date photos are scheduled to be taken to advise that their child will not participate. No parent or carer is obligated to purchase any photographs taken.

3.5.2 Commercial usage of images: professional photographers commissioned by the School to sell images may place images with participant names on their website to enable participants to view and purchase photographs or videos. Such sites must not be accessible for the general public viewing.

3.6. Images to be used or disclosed outside the school community:

3.6.1. External use or disclosure by the School: photographs, film or audio recordings of students may also be used in publications that are accessible to the public, including:

- on the School's website [including in the school newsletter, which is publicly available on the website]; and
- on the School's social media accounts; and
- on radio for promotional purposes.

Photography and filming consent is collected on the Enrolment Application Form and parents and carers can update permission this at any time via Consent2Go.

Parents who indicate they do not give permission for photographs, filming or audio as obtained on Consent2Go will be contacted by the school and be provided clarification as to what this entails. i.e. consent can be given for photographs in the School Magazine and official annual school class group photos only but consent for other publishing can be withdrawn. Where possible, parents and carers will be notified if we wish to use individual images of their child for specific advertising or promotional purposes, for example on roadside signs.

3.6.2 Media: the media, or the School's Marketing Team, may seek to photograph, film or record students for a news story or school event. This may include broadcast media, online or social media or print media, including newspapers, magazine publications and public signage. When the School receives such requests, the School will:

- provide parents and carers with information about the organisation involved and when/for what purposes the photography, filming or recording will occur; and
- seek prior, express parent and carer consent in writing.

Students will only be photographed, filmed or recorded by the media at the School if express consent is provided for that specific media event. The School does not own or control any photographs, videos or recordings of students taken by the media.

3.7. **School Staff:** School staff are permitted to film or photograph children and young people to whom we provide a service only if:

- permission has been sought from the child/young person and their parent/carer prior to being photographed or filmed;
- the child is appropriately dressed and posed;
- the image is taken using approved school photography/filming equipment, i.e. school-supplied electronic devices. *NOTE: this does not include mobile phones supplied as a part of a staff members' remuneration package
- personal recording equipment is not to be used when photographing or filming children and young people in our service;
- Staff should avoid situations where they are alone in an enclosed space with a student. Where employees are required to photograph a single student, it should be in an open space in view of others. Where this is not possible or practical, it should be discussed with the Principal.

3.8. **Storage and Distribution:** images may be distributed (including as an attachment to an email) to approved external agencies outside our organisation with the approval of delegated and authorised staff.

- Images (digital or hard copy) are to be stored in a manner that prevents unauthorised access by others;
- Images (digital or hard copy) are to be destroyed or deleted as soon as they are no longer required;
- images that are publicly accessible must be presented in a manner that de-identifies the child or young person, unless expressly permitted by the parents or carers. Any caption or accompanying text may need to be checked so that it does not identify a child or young person if such identification is potentially detrimental.

3.9. **Monitoring and Review:** this Policy will be reviewed by the Executive at least every three years after consultation. Some circumstances may trigger an early review, including but not limited to legislative changes, organisational changes, incident outcomes and other matters deemed appropriate by the Chief Executive Officer.

When there are any updates or changes to this Policy, they will be communicated to all staff and stakeholders.

4. References and Additional Related Documents

The following CST policies must be considered in relation to this document:

- CST's Staff Code of Conduct
- CST's Privacy Policy
- CST's Responding to Child Abuse and Allegations Policy
- CST's Complaints, Grievances and Conflict Policy
- CST's Volunteer Policy
- [Australian Privacy Principal Guidelines](#)

5. **Record Keeping**

- 5.1 This Policy is to be kept for three (3) years until review, unless there is a significant legislative or organisational change requiring earlier review.

- 5.2 The master copy is kept in <https://www.cst.tas.edu.au/services> under Policy Documents, online in read-only in PDF form. Any printed or downloaded copies are deemed uncontrolled.

APPENDIX

GENERAL DEFINITION OF TERMS:

Where referred to in this document:

Christian Schools Tasmania (CST) means an association of Christians who, through their Board of Directors, are legally responsible for Calvin Christian School, Channel Christian School, Emmanuel Christian School and Northern Christian School.

The School refers to the CST school to whom the Policy applies.

The Board means the Board of Directors of Christian Schools Tasmania.

Executive is a forum including the Chief Executive Officer, Principals and the Business Manager.

Chief Executive Officer (CEO) is the person appointed to the position of Chief Executive Officer of the Association, or a person acting from time to time in that position.

Principal means the person charged with responsibility for the operation of an Association school, or a person acting from time to time in that position.

Compliance Manager is the person appointed to the position of Compliance Manager of the Association, or a person acting from time to time in that position.

Business Manager is the person appointed to the position of Business Manager of the Association, or a person acting from time to time in that position.

Manager means a person appointed to a managerial position within CST.

Staff is any person either employed by CST either on a casual, part-time or permanent basis as well as volunteers, contractors and sub-contractors engaged in working at a CST School.

Parent is a person who is the legal guardian of a child enrolled at a CST school.

Child means any student enrolled at a CST school.