



**HERITAGE
COLLEGE**
KNOX

PHOTOGRAPHING, FILMING & RECORDING STUDENTS POLICY

PURPOSE

Heritage College Knox ("College") recognises that photographs, films, videos, audio recordings and other images or recordings of students are personal information and must be collected, used, stored and disclosed in accordance with applicable privacy laws and College policies.

The purpose of this policy is to ensure that students are photographed, filmed or recorded in a safe, respectful and appropriate manner, and that their personal information is handled responsibly.

It is intended to inform the College community:

- how the College collects, uses and discloses photographs, video and audio recordings of students
- when parent/carer consent is required before photographing, filming and recording students
- how and when consent can be provided and withdrawn.

SCOPE

This policy applies to the general collection, use and disclosure of photographs, video and audio recordings of students (including CCTV).

This policy applies to:

- all students
- College staff, contractors and volunteers who photograph, film or record students for College purposes
- photographers, media organisations and other external parties authorised by the College
- parents and carers attending College events where photography or filming may occur
- photographs, video, film, audio and digital recordings collected by or on behalf of the College.

The policy does not cover the:

- use and disclosure of photographs, video and audio recordings of adults.

POLICY

There are many occasions during the school year where the College staff photograph, film or record students participating in college activities or events.

In addition, with increasing concerns regarding the illegal and unauthorised use of images, deepfakes and Generative AI, the College also seeks to provide guidelines to protect students.

This policy outlines the practices that the College has in place for the collection, use and disclosure of photographs, video and audio recordings of students to ensure compliance with the Privacy and Data Protection Act 2014 (Vic).

It also explains the circumstances in which we will seek parent/carer consent and how consent can be provided and withdrawn.

CONSENT

The Photographing, Filming and Recording Students Consent Form is provided by the College at enrolment. This form applies to standard uses of images for the time your child attends the College. Consent, if given, applies until it is withdrawn or changed. If a parent/carer would like to withdraw or change their consent at any point in time, they must notify the College.

Use of photographs, video and audio recordings

The College uses photographs, video and audio recordings in the following ways:

A Administration and Management of the College community

This covers images used for administration purposes; to fulfil our College's legal obligations, including child safety; and to manage student behaviour.

1. Official College photographs

Each year, the College will arrange for a professional photographer to take official College photographs of students. This will generally involve both class photographs and individual photographs being taken. The College will notify parents/carers in advance of the official College photography date. It is expected that all students will have the individual portrait taken and participate in the class photo. There is no obligation on any parent or carer to purchase any photographs taken. The photographer will be required to comply with the College's privacy and information handling requirements.

Official College photographs will be for authorised purposes only including:

- used for college identification cards and student identity verification letters
- stored for educational and administrative purposes
- displayed on Compass
- used and archived as part of the College history

Parents/carers who choose to opt out of having their child participate in official college photographs (including having their child removed from the class photos) must contact the Principal before the date photographs are scheduled to be taken to advise that their child will not participate.

2. CCTV and other photographs, video or audio recordings

On occasion, it may be necessary for College staff to photograph, film or record students and/or use photographs, video or audio recordings to:

- fulfil the College's legal obligations, including to:
 - take reasonable steps to reduce the risk of reasonably foreseeable harm to students, staff and visitors (duty of care)
 - provide a safe and suitable workplace (occupational health and safety law)
 - supporting students' social and emotional wellbeing, and health (duty of care)
- for identification purposes, when necessary to implement discipline and/or behaviour management policies.



The College does not require or obtain consent from parents/carers or students to photograph, film or record students, or to use these photographs, video or audio recordings for administration, to manage student behaviour, or to fulfil the College's legal obligations. However, when the College photographs, films or records a student for any of these purposes, staff will only collect and use such photographs, video or audio recordings in a way that is necessary, reasonable and appropriate in the circumstances.

The College will use student photographs, video or audio recordings reasonably, appropriately and sensitively, consistent with our obligations under the Child Safe Standards. If at any time a parent/carer or student has a concern about the use of any images they should contact the Principal.

3. Curriculum-based activities

Photographs, video and audio recordings of students may be collected and used for curriculum-based activities (i.e. class work) as part of standard learning and teaching practices. The College does not require or obtain consent for this. Access is limited to students and relevant teaching staff. Use of the photographs, video or audio recordings is limited to the learning activity and may not be used in any other ways (see Student Code of Conduct). Parents/carers may have access to images of their own child in this context.

Staff must:

- use school-approved devices or systems wherever practicable
- follow school requirements for storing and transferring images
- not use student photographs or recordings for personal purposes
- not post student photographs or recordings on personal social media accounts
- not share photographs or recordings with unauthorised people
- immediately report any accidental disclosure, loss or inappropriate sharing of student images to the principal or appropriate school privacy contact.

Particular care will be taken where photographs or recordings may reveal:

- health or disability information
- sensitive personal circumstances
- culturally sensitive information
- a student's location or vulnerability
- behaviour that could cause embarrassment or harm
- other information that may place a student at risk.

4. Professional development

Occasionally, teachers and classes may be recorded for professional development purposes to improve the delivery of educational services. The College does not require or obtain consent for this, however the recordings will only be used internally and for the specific purpose of staff development.



B Within the College Community

The College may photograph, film or record students to use within the College community (staff, students and parents or carers). The College will appoint designated photographers at community events.

The College seeks permission for the use of photographs, video and audio recordings within the College community outlined below:

1. Celebration of Achievement

Identifiable photographs, video and audio recordings may be shared as follows:

Printed images

- Yearbook (printed)
- Notice boards and posters
- curriculum handbooks
- College newsletter

PowerPoint/Slides

- Assemblies and classes
- Presentation Night
- Information Nights

Apps (access by permission)

- Class Dojo
- Photo Circle

2. Images taken by the College community

The College permits parents/carers, students and invited guests to gain approval prior to an event to photograph, film or record College performances, sporting events and other College-approved activities.

The College requests that parents/carers, students and invited guests who photograph, film or record college activities only do so of their own children (as far as practicable) and for their own personal use. The College requests that parents/carers, students and invited guests respect student privacy and do not publish the photographs, video or audio recordings in any form, including on social media, without the prior consent of persons whose children also appear in them.

The College does not own or control any images of students taken by parents/carers, students or their invited guests at College activities.

For general crowd photographs that do not focus on particular individuals, the College may use an opt-out approach. This may include:

- notifying families through event invitations or newsletters
- displaying signs at entrances advising that photography or filming is occurring
- providing a reasonable opportunity for people who do not wish to be photographed to identify themselves.

C. Beyond the College community

Photographs, video or audio recordings of students may also be used in publications that are accessible to the public.



1. College information and marketing

- The College website (will predominantly use images that are not identifiable.)
- The College Prospectus
- Billboards

When identifiable photographs, video or audio recordings are to be used, the College will seek prior parent/carer consent in writing.

2. Social Media

Meta: Facebook, Snapchat and Instagram

The College is aware that Meta platforms regularly 'harvest' images and information posted on its platforms.

The College will continue to use Facebook to promote the College for the purpose of showcasing the College and its busy life and student work.

The College will not display any identifiable photographs, video or audio recordings of students, parents and staff.

Before publishing a photograph, video or audio recording of a student, the College will consider:

- whether appropriate consent has been obtained
- the purpose for which the material was collected
- whether the proposed publication is consistent with that purpose
- whether the student can be identified
- whether publication could create a safety, privacy or reputational risk.

The College will only use the first name of students when mentioning or congratulating individual students on achievements.

3. Media

The media may seek to photograph, film or record students for a news story or College event. This may include broadcast media, online or social media or print media, including newspapers and magazine publications. When the College receives such requests, we will:

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

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

The College will not provide student information to media organisations without appropriate authority and parent/carer consent.



4. Research

On occasion, the College may agree to research projects being conducted at the college. If this occurs, parent/carer consent will be sought for student participation, including any photography, video or audio recording of students.

5. External organisations and third parties

If there is a situation which will involve the collection, use or disclosure of photographs, video or audio recordings of students by or to third parties which is not otherwise covered by this policy, the College will:

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

D. Storage and handling

Photographs, video and recordings of students taken by the College will be stored in our secure document storage systems with restricted access for legitimate College purposes. Any photographs, videos or audio recordings made on personal devices, including non-college issued devices, will be transferred to secure college systems and removed from the personal devices as soon as reasonably practicable.

Staff and authorised users must not:

- store student images on unauthorised personal devices or accounts
- transfer student images using unauthorised applications or services
- share student images with unauthorised persons
- retain copies longer than necessary.

Where a privacy incident involving student photographs, films or recordings occurs, the matter must be reported and managed in accordance with the College's procedures.

E. Withdrawal of Consent

If at any time parents/carers wish to withdraw their consent, they can by contacting the College in writing. If consent is withdrawn verbally, the college will make a written record of this. The College will take reasonable steps to implement the changed preference for future collection and use. However:

- if the images have already been published and are in the public domain, the College will endeavour to take reasonable steps to remove them but it may not be possible to remove them (as in the case of physical publications)
- the College can still collect, use and disclose images in circumstances where consent is not required.
- the College photograph, film or record students to use within the physical College environment, including:
- for display on noticeboards (physical and electronic) to celebrate achievements
 - In staff areas to ensure health, safety and wellbeing needs are being supported
 - in assembly slides to celebrate achievements
 - used by staff for them to easily identify students with medical needs
 - used by staff for them to get to know students by their name



F. Copyright

Where photographs, video or audio recordings have been created by an external person or organisation, the College will consider copyright and licensing requirements before using, reproducing or publishing the material.

The College will comply with relevant copyright legislation.

G. Annual privacy reminder

The College will provide an annual privacy reminder to families.

The reminder will include a link to:

- the College's Privacy Policy;
- the College's Photographing, Filming and Recording Students Policy;
- the Photographing, Filming and Recording Students Consent Form.

H. Complaints and concerns

Parents, carers and students who have concerns about the collection, use or disclosure of a photograph, video or audio recording should contact:

Principal: Maureen

Theobald

Email: principal@heritage.vic.edu.au

Phone: 0402685409

The College will respond to privacy concerns in accordance with its complaints and privacy procedures.

I. Related policies and legislation

This policy should be read in conjunction with:

- The College's Privacy Policy
- the College's Student Code of Conduct;
- Privacy and Data Protection Act 2014 (Vic)
- Copyright Act 1968 (Cth)

J. Review

This policy will be reviewed every 3 years, or earlier where there are changes to legislation or the College's practices.

- Policy owner: Principal
- Last reviewed: September 2026
- Next review: September 2029

