



# Photography and Filming Policy

## 1 Purpose

The purpose of this Photography and Filming Policy (the Policy) is to ensure the appropriate collection and use of photographs, and audio and film recordings at Brisbane Girls Grammar School (the School) to protect the privacy of individuals and their right to control how, and for what purpose, their personal information is used.

## 2 Scope

This Policy applies to all members of the School community—students, parents and/or guardians, staff, alumnae, incoming students, and family and friends. It applies to all School-approved functions and events, including Outdoor Education Programs and School excursions, regardless of whether they are held within or beyond the School's premises. This policy relates only to photos/videos captured for use by the School—either by staff or an external supplier—and not to those captured for personal use, even if at a School event (i.e. photo booths at School events that allow parents to purchase photos for personal use, or photos taken by parents and/or external suppliers organised by the School on personal devices). The School cannot be held liable for photos taken by anyone outside of staff or external suppliers who have been organised by the School.

## 3 Policy

Brisbane Girls Grammar School is committed to protecting the rights and privacy of its School community. This Policy outlines how the School manages the collection and use of images and footage of those in the School community.

## 4 Role and responsibilities

### 4.1 Principal (or authorised delegate)

The Principal is responsible for:

- (a) ensuring that risks associated with the photographing and recording of students and staff are managed effectively by the School in accordance with this Policy and related procedures
- (b) ensuring the implementation of this Policy
- (c) ensuring all staff and others in the School community are aware of, and adhere to, this Policy.

### 4.2 Director of Communications and Engagement (C&E)

The Director of C&E is responsible for ensuring:

- (a) all images/recordings used in School publications, printed material, advertising, website, and social media are appropriate and that consent has been provided for their use (excepting staff, who are required to 'opt-out' of consent by contacting C&E)
- (b) C&E staff and external suppliers understand and adhere to the *Photography and Filming Policy*
- (c) procedures and practices outlined in *Appendix A—Photography, Filming, and Audio Procedures* are implemented and managed correctly
- (d) complaints from parents/guardians or the School community in relation to photography and recording of students are recorded, responded to, and reported to the Principal, or her authorised delegate.

### 4.3 Communications

The Communications Team is responsible for:

- (a) advising parents/guardians when photographs and/or film of their child are to be taken, as appropriate and required (see *Appendix A—Photography, Filming and Audio Procedures*)
- (b) providing parents/guardians with the choice to withhold or withdraw consent for their child to be photographed or filmed, initially via the *Enrolment Agreement*, and subsequently via written communication
- (c) managing how and when those external to the School community collect and publish photographs and/or recordings of students and staff if directly engaged by the School to capture photos/recordings for School use
- (d) where possible and required, seeking additional consent from parents/guardians should their daughter be nominated by the School to participate in external media interviews and or/photoshoots (see *Appendix A—Photography, Filming and Audio Procedures*)
- (e) providing guidance to parents/guardians/the School community about when it is appropriate to take images or recordings of minors, and legislation pertaining to distribution of images/recordings.

## 5 Reporting of breaches of this Policy

The following will be reported to the Principal, Deputy Principal, senior management, or relevant authorities as required:

- (a) complaints from parents or the School community regarding a breach of privacy in relation to the use of images and/or filmed content
- (b) indecent or inappropriate photography or filming of students.

## 6 Review and monitoring

This Policy will be reviewed every two years, or in the event of any information, incident, legislative changes or organisational practice that would demonstrate the need for a review.

<b>Document title</b>	Photography and Filming Policy	<b>Author</b>	Director of C&E
<b>Version</b>	804/2009v4	<b>Approval</b>	Principal
<b>Distribution</b>	Minerva	<b>Date</b>	February 2024

## 7 Definitions

**Photography** includes photographic prints, streaming media and transparencies, video, film, and digital imaging created using devices such as cameras, video cameras, phones, or tablets.

**Photographs** are defined as the taking of a still-shot picture with the use of a camera, phone or other device.

**Filming** is defined as when a person captures a moment/s with the use of a phone, camera, tablet or other device that records the movement of an event.

**Audio recording** is defined as capturing sound, but not visual footage, using a device or application that records sound.

**Media library** is the School's online photograph repository, where images are stored digitally for use by the School.

## 8 Related documents

*Child Protection Policy*

*Child Risk Management Strategy*

*Privacy Policy*

*Staff Code of Conduct*



## Appendix A: Photography, filming and audio strategy

### 1 Collecting and holding images, recordings and video by the School

The School's *Privacy Policy* deals with the manner and circumstances in which the School collects, holds, uses and discloses the personal information of students, staff and other people who have contact with the School.

In addition to the parameters set out in the *Privacy Policy*, the School collects photographs/films/images/recordings through recording photographs and films of academic, musical, theatrical, sporting and other activities where students and staff are participating in a school capacity.

The School holds such photographs and films in hard copy and/or electronic formats. In addition:

- (a) photos taken by an external provider may be held by the supplier for future use by the School, but cannot be used in any other capacity without written approval by the School (C&E)
- (b) external suppliers may take photos at School events, for purchase by parents. While the School coordinates this service, the use of photos/recordings captured by such suppliers is not covered by this Policy
- (c) staff members may, from time to time, take images of School events and students on their phone or other device, in situations where the School's photographers are not present. In this situation, staff are to email photos to C&E and then delete them from their device (including from any cloud-based storage).

The School collects images/recordings/video to maintain historical records of the School's past and present students and staff. Images/recordings that feature individuals are to be stored on designated School servers as follows:

- (a) if captured by C&E (or an external photographer engaged by C&E) in C&E folders, accessible by C&E and senior School staff
- (b) if captured by the School's Media Team (historical process) stored in Media folders, accessible to all staff
- (c) Photos captured by C&E, authorised suppliers, Media or staff may also be stored on the School's online media library.

### 2 Publishing, using, and sharing

The School publishes and discloses such photographs and films in School newsletters, publications, advertising, the School's website, and other media, on the School's social media platforms, other media formats and at events (via onscreen presentations or other collateral). The School may also publish or disclose images for educational purposes (e.g. in-class presentations or displays around the School).

Use by the School of such photographs and films will be governed by the following principles:

- (a) images will not be used in a way or for a purpose that will be prejudicial to a student's interests
- (b) images will be used where students are dressed in the official School uniform or sports uniform (or casual clothes at a School or School-related event such as camps or excursions, or other instances as appropriate) and care will be taken to ensure the modesty of all students is protected
- (c) only limited personal information of a student will accompany an image (generally their full name, and potentially Year level/House Group)—contact details, middle names and addresses will not be used except on material intended to be kept confidential to the School and staff
- (d) under no circumstances are images of students to be posted by staff on any personal accounts (e.g. social media) or stored on the personal devices of staff (e.g. phones, tablets, PC).

The School, in consultation with students, and parents/guardians, may provide students with commercial media opportunities and acknowledges that:

- (a) the School will only participate in media opportunities where, in the opinion of the Principal, involvement by students and/or the School is considered to align with the ethos and values of the School
- (b) media access will be managed at all times by a representative of the School's C&E Department
- (c) parents/guardians will be contacted by the School before media interviews or photography occurs, where possible, though the last-minute nature of some requests will prevent this (only students with media consent will be considered for external media)

- (d) parents/guardians may be required to complete an external consent form, as supplied by the media organisation, to authorise use of images/recordings captured by the media outlet
- (e) students nominated to participate in interviews with media will be briefed by C&E prior to meeting journalists, and a representative of the School will be present at all times during media interviews.

C&E will endeavour to inform parents/guardians of a planned photography or film shoot in which their daughter is scheduled to participate, even if the School holds media consent for the student, noting details of the event and how images will be used. There may be times when this is not possible.

There may be instances where a photo/footage of a student who does not hold media consent is captured (e.g. at an event such as Open Day, Mother/Father Daughter Dinners). The School will verify the identity of students prior to using any such images, and those featuring students without consent will not be used, unless parents provide written permission to do so.

The School does not share captured photos or footage with parents. Parents have the opportunity to purchase photos at signature events (e.g. Valedictory Dinner) captured by photographers external to the School.

The School cannot control the distribution of images/recordings once shared on official School electronic or print platforms (e.g. social media, publications). The School can also not control the use of any images/recordings captured by external parties (including journalists and media organisations).

In the event that any parent and/or guardian, staff member or student does not want images of them or their daughter to be used as set out in this Policy, a written request to opt-out of such activity should be sent to C&E. In this instance, if the School holds media consent for a student, this will be altered on TASS to reflect the revocation of consent. Parents/guardians of students without media consent can, in consultation with C&E, provide one-off consent for particular images/recordings.

If the School wishes to use an image/recording of a student or staff member who has not provided consent, C&E can elect to contact the parents/staff member to seek their consent. This must be undertaken by, and at the discretion of, C&E. C&E maintains a list of those staff who do not provide consent for their image and/or name to be shared publicly (opt-out process).

Any images/recordings that feature incoming students and parents, current or former parents, alumnae, the Board of Trustees, or any other individual external to the School

community can only be used with consent (in some cases, this is opt-out). In seeking consent, how the images/recordings will be used must be detailed. This consent is either detailed on booking platforms for School events, or an announcement made at the start of an event to advise attendees to speak to C&E if they do not wish for their photo to be taken.

Any use of an image external to the School's channels requires the written approval of C&E. The sharing of these images will only occur if it is the opinion of the School that the use of this material is considered to align with the ethos and values of the School.

If staff do not wish a photo or recording of them to appear in any School-branded material, they must contact C&E to revoke consent.

C&E are the only representatives of the School who can provide official consent for images/recordings to be used outside the School's channels or by an external party.

### 3 Photography and filming of School events by parents and members of the community

- (a) The School understands that students, parents and/or guardians, alumnae, family and friends may wish to take photographs or films of students and their friends during School events or activities.
- (b) The School permits the taking of photographs and video images (provided that such activity is not in breach of copyright or some other legal right) and does not generally prohibit the taking of photographs or films at School events or activities, although it has the right to do so.
- (c) Parents/guardians intending to take images or recordings of their daughter/s at School events should be aware of the privacy and child protection laws relating to the appropriate use of images involving students. Any images taken by parents must be for private use only.
- (d) Girls Grammar encourages the School community to refer to '[Photos, Videos and Social Media](#)' guidance published by the Office of the Children's eSafety Commissioner, Australian Government (<https://www.esafety.gov.au/education-resources/iparent/staying-safe/photos-videos-and-social-media>) and '[Images of Children and Young People Online](#)' published by the Australian Institute of Family Studies, Australian Government

- (e) If staff take photos at an official School activity for the purposes of sharing via the School's newsletter or other channels (e.g. social media), once images are shared with C&E, they must be removed from any personal device on which they have been captured. Where possible, staff should use School cameras to capture imagery or recordings.

### 3.1 When photography and filming will not be allowed

- (a) There may be events or functions where the School decides to prohibit or restrict the taking of photographs or films, or to restrict the times or opportunities at which photographs or filming may take place. There may be situations where private venues require the School to prohibit or restrict the taking of photographs and films. There may also be copyright and other legal considerations, for example at musical or theatrical performances, which prohibit the taking of photographs or films.
- (b) If any prohibitions or restrictions on photography or filming are imposed, the School community will be informed in advance of the event taking place (where possible) and also at the time of the event. All persons attending such functions will be requested to respect and abide by any restrictions the School imposes.

## 4 Public Places

There is currently no one specific piece of legislation preventing people from taking photos of children and young people in public places unless the person photographing, or filming creates a 'public nuisance'. This only applies to the photographer or videographer if their conduct is 'offensive' or 'threatening' and likely to interfere with public enjoyment of a public place (under 's6' of the *Queensland Summary Offences Act 2005*).

## 5 Private Property

There is a common law understanding when a person enters private land that they consent to any requirements that the property owner may impose upon them. This means the property owner, for example a school or sports club, may not permit photographs or videos of events held on their land to be taken. However, there is nothing to prevent a person from taking photos from outside the borders of private land, regardless of the property owner's preferences.

## 6 Indecent/inappropriate filming or photography

- (a) It is against the law to take indecent photographs of a child under the age of 16 or to involve a child in any material which exploits them. Under 's210 (1) (f)' of the *Criminal Code Act 1899*, it is an offence if a person takes an indecent photograph of a child under the age of 16 years.
- (b) Under 's43' of the *Classification of Films Act 1991*, a person must not procure, or attempt to procure, a minor to be in any way concerned in the making or production of an objectionable film.
- (c) If any member of the School community has concerns about any person taking photographs or films of students in breach of this Policy or for inappropriate, unlawful, or indecent purposes, please notify the Principal or her authorised delegate as soon as possible so the School may take appropriate action, including reporting such activity to Queensland Police Service.

## 7 Parental Consent

- (a) Parent consent is obtained via the *Enrolment Agreement (EA)*. Should parents/guardians wish to change their consent preference after signing the EA, a request must be provided to the School's Communication and Engagement (C&E) Department (either directly, or via a staff member, such as a Head of House) in writing. C&E will contact the parent/guardian to confirm that consent has been revoked.
- (b) If a student does not have parental consent, C&E may seek consent on a case-by-case basis prior to photography and/or recording taking place.
- (c) Images or recordings of students for whom the School does not hold consent will not be published.

## 8 Third Party Use

Companies external to the School engaged to perform work on behalf of the School, e.g. suppliers, coaches, etc., are not permitted to share photos of students on company accounts without the written consent of C&E (see *Appendix B: Collection, use and disclosure*).



## Appendix B: Collection, use and disclosure

The following table outlines the consent required for collection, use and disclosure of images/recordings for staff reference.

Collection Type	School use	Disclosure to third parties	Documentation required
Official School photographs	<ul style="list-style-type: none"> <li>- Stored on School servers</li> <li>- Used in <i>School Magazine</i></li> </ul>	<ul style="list-style-type: none"> <li>- Parents/guardians (purchased)</li> </ul>	<ul style="list-style-type: none"> <li>- Consent provided in <i>Enrolment Agreement</i>, and recorded on TASS</li> </ul>
All other School photos, video, audio recordings	<ul style="list-style-type: none"> <li>- School publications (newsletter, magazines, website)</li> <li>- School social media channels (Facebook, X, LinkedIn, and Instagram)</li> <li>- School collateral (posters, banners, presentations)</li> <li>- Events (e.g. Parent Information evenings, Speech Day)</li> <li>- External recruitment platforms (staff photos only) such as SEEK or LinkedIn, or in recruitment advertising</li> </ul>	<ul style="list-style-type: none"> <li>- Parents/guardians, in alignment with Section 2 of this Policy</li> <li>- Media, in alignment with Section 2 of this Policy</li> <li>- External agencies, in alignment with Section 2 of this Policy</li> </ul>	<ul style="list-style-type: none"> <li>- Consent provided in <i>Enrolment Agreement</i>, and recorded on TASS</li> <li>- Specific consent by C&amp;E (if shared with media or other external agencies), parents advised as appropriate</li> <li>- External consent forms, if required by external agencies/media</li> </ul>
Photos, video, and audio recordings captured by external suppliers (including media)	<ul style="list-style-type: none"> <li>- School publications (newsletter, magazines)</li> <li>- School social media channels (Facebook, X, LinkedIn)</li> <li>- School collateral (posters, banners, adverts, podcasts)</li> </ul>	<ul style="list-style-type: none"> <li>- Parents/guardians, in alignment with Section 2 of this Policy</li> <li>- Media, in alignment with Section 2 of this Policy</li> <li>- External agencies, in alignment with Section 2 of this Policy</li> </ul>	<ul style="list-style-type: none"> <li>- Consent provided in <i>Enrolment Agreement</i>, and recorded on TASS</li> <li>- Specific consent by C&amp;E (if shared with media or other external agencies), parents advised as appropriate</li> <li>- External consent forms, if required by external agencies/media</li> <li>- Copyright release form, if required by external supplier (please note, this may incur a cost to the School, and will be undertaken at the discretion of C&amp;E)</li> </ul>