



Responsible Trustee	Date policy produced	Name of Policy Writer	Frequency of Review	Date reviewed on / by whom	
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## Cambray Data Protection Policy (Photographs and Videos etc.)

This document extends the **Cambray Document Protection Policy** to cover use of photographs, images, videography and exposure on recorded services and Live Streaming relating to Cambray Baptist Church (CBC). It should be read in conjunction with the following Cambray policies **Data Protection, Safeguarding and Document Storage**.

Where there appears to be a conflict between these documents regarding retention periods of specific document types, the legal requirements of the Acts noted in the Cambray Document Storage Policy will always apply.

For the purpose of this document the use of the term “image” includes but it is not limited to photography and videography.

The Data Protection Legislation is concerned with the protection of human rights in relation to personal data. The aim of the Legislation is to ensure that personal data is used fairly and lawfully and that where necessary the privacy of individuals is respected. During the course of the activities of CBC, the Church Trustees (**we**) will collect, store and process personal data about our members, people who attend our services and activities, suppliers and other third parties and we recognise that the correct and lawful treatment of this data will maintain confidence in the Church. This policy sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.

The Data Protection Officer is responsible for ensuring compliance with the Legislation and with this policy.

Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Officer.

### **Photographs, images, videography, recorded services and Live Streaming**

Someone’s image is part of their personal information and should be treated in the same way as other personal information. There are some instances where it is in the church’s legitimate interest to publish photos of easily identifiable individuals. There are cases when this is helpful. e.g.

<https://www.cambray.org/new-here/who-is-who/> or someone introducing themselves on a video.

Use of an image should not be doing so in a way that could cause upset or offence to those whose image we would like to use.

However, there are some people who have very good reasons for not wanting their image taken, stored or published and we need to respect that.

We should:

- Always gain specific consent when publishing images of named individuals (or of any children under 16 – but also refer to Safeguarding rules)
- Always seek to gain consent when publishing images of clearly identifiable unnamed individuals. Where this is not possible the decision on whether to publish the image should be referred to the data protection officer
- Provide as much information as possible when capturing images at services or events. Such information should explain what the images are likely to be used for and give clear instructions as to what people should do if they do not wish their image to be captured and stored for publication by the church.
- Provide a 'photo/video' free area of the church where people can sit if they do not wish to be photographed, video'd or live-streamed and take all reasonable steps to make sure this area is clearly identified to all attending prior to the start of image capturing.

### **Use of 'stock' images**

There are often situations where the use of stock images would enhance such things as presentations or videos. Extreme care must be taken that any chosen image is not subject to copyright. There are many images available on the internet which imply they are copyright free but it must be emphasised that care should always be taken before using any image. Misuse can give rise to prosecution.

### **Processing personal data**

Please refer to the Cambray Data Protection Policy.

### **Sending images abroad**

Please note that publishing of images abroad could be subject to restrictions in the receiving country and would need to be addressed. However the rules here are outside the scope of this document but should be borne in mind if the situation arises.