PHOTOGRAPHY AND FILMING FOR COUNCIL COMMUNICATIONS POLICY

1. Purpose and scope

1.1 This policy sets out Diss Town Council's approach to photographs, video and audio-visual recordings created for Council communications. It is intended to protect people's privacy, dignity and safety while enabling the Council to communicate its work and activities.

1.2 It applies to identifiable subjects, including employees, councillors, volunteers, contractors, event participants and members of the public. Additional safeguards apply where children or adults at risk may be photographed or filmed.

1.3 It covers material created for the Council's website, social-media accounts, newsletters, press releases, recruitment, campaigns, presentations, public displays and other communications, whether produced by Council staff or by someone acting on the Council's behalf.

1.4 It does not prevent recording required for operational, evidential, training, health and safety, democratic, legal or archival purposes. Such material must be managed according to its purpose and the Council's relevant policies and legal duties.

2. Core principles

2.1 The Council will:

- use photographs and recordings only for a clear and legitimate Council purpose;
- be open about how identifiable material is intended to be used;
- collect and publish no more personal information than is necessary;
- respect reasonable requests not to be deliberately featured;
- provide a practical alternative where someone does not wish to be identifiable;
- consider privacy, dignity, safeguarding, safety and security before publication;
- avoid unnecessarily revealing live locations, routines or working patterns; and
- respond promptly and proportionately to concerns about planned or published material.

2.2 Wherever practicable, communications should focus on the activity, service, equipment or outcome rather than unnecessarily identifying individuals.

3. Notification, agreement and participation

3.1 Where a person is to be deliberately and recognisably featured, they should normally be told:

- the purpose of the photograph or recording;

- where it is expected to be published;
- whether their name, role or other identifying information will be used; and
- whether the material may be retained or reused.

3.2 Employees, councillors, volunteers and contractors should not be required to take part in planned promotional content. Agreement should be informed and recorded where appropriate. Declining must not result in unfair treatment or disadvantage.
3.3 Suitable alternatives include photographing the activity without identifying the individual, using a wider or rear view, showing hands or equipment, or photographing the completed work.
3.4 Agreement to one use does not automatically authorise every future or materially different use. Before reuse, the Council must check that the purpose remains appropriate and that no restriction, objection or withdrawal has been recorded.
3.5 Withdrawal of agreement applies to future use. The Council will take reasonable steps in relation to material under its control but may be unable to recover copies already shared, downloaded or republished by others.

4. Public events, children and adults at risk
4.1 At public events, the Council may use clear advance information and on-site notices to explain that photography or filming will take place, its purpose and how concerns can be raised. Where practicable, people should be given a reasonable way to avoid being deliberately photographed or filmed.
4.2 A person appearing incidentally in a crowd or background should be treated proportionately. A closer or individually focused image requires greater care than a general scene.
4.3 Children must not be deliberately and recognisably featured without suitable consent from a person with parental responsibility and, where appropriate, the child's agreement. Names, locations and other identifying details must be limited and safeguarding risks considered.
4.4 Particular care must be taken where an adult may be at risk or may not be able to give informed agreement. Advice must be sought from the Town Clerk before publication if there is uncertainty.

5. Safety, privacy and content checks
5.1 Photography or filming must not distract anyone undertaking a safety-critical task or interfere with safe working. Required protective equipment and safe systems of work must remain in place; unsafe activities must never be staged for a photograph or recording.
5.2 Before publication, the authorised person must check that the content does not unnecessarily disclose:
- personal contact details, private information or personal social-media accounts;
- live locations, lone working, regular routes, routines or predictable working patterns;
- vehicle registrations, keys, access arrangements or security measures;
- documents, computer screens, personal data or confidential information; or
- the location of valuable equipment or non-public areas.

5.3 Names, job titles, tags and captions must be accurate, necessary and appropriate. Humorous or informal wording must not embarrass, undermine or place unwanted attention on the subject.
5.4 Where a risk is identified, the content must be amended, delayed, replaced or not published.

6. Approval, publication and management
6.1 Only persons authorised by the Town Clerk may publish material through official Council channels. Before publication, the short check in Appendix A, or an equivalent recorded check, must be completed.
6.2 Photographs, recordings and any associated permissions or restrictions must be stored in an approved Council location, with access limited to those who need it.

6.3 Material must not be kept indefinitely merely because it may be useful. Retention and deletion must follow the Council's approved retention arrangements. Reusable material must be reviewed periodically to confirm that continued use remains accurate and appropriate.
6.4 A subject may raise a concern with the Town Clerk or the person responsible for data protection. The Council will review the purpose, continuing need, lawful basis, safety and privacy implications, and whether the material should be removed, edited, restricted or retained.
6.5 Comments on Council-managed accounts must be moderated in accordance with the Council's arrangements. Abuse, threats, harassment or disclosure of personal information must be addressed promptly and escalated where necessary.

7. Responsibilities and incidents

7.1 The Town Clerk is responsible for implementing this policy, authorising publishers and deciding or approving action following significant concerns or incidents.
7.2 Anyone creating or publishing material on the Council's behalf must explain the intended use where required, complete the relevant checks, obtain approval, avoid unnecessary personal information and store material appropriately.
7.3 Subjects and other persons involved should raise concerns as soon as reasonably practicable. Staff and contractors must not publish material obtained through their work unless authorised.
7.4 Accidental or unauthorised publication must be reported immediately to the Town Clerk or the person responsible for data protection. The Council will take proportionate action, including removal or restriction, preservation of evidence, assessment of any personal-data breach and procedural review.

8. Related documents and review

8.1 This policy should be read with the Council's current Communications Policy, Data Protection Policy and privacy information, Data and Records Retention Policy, Health and Safety Policy, Lone Working Policy, safeguarding arrangements and social-media moderation arrangements.
8.2 The policy will be reviewed every four years, or earlier following a significant incident, material legal or regulatory change, substantial change in communication practice, or significant concern.

APPENDIX A: SHORT PRE-PUBLICATION CHECK

Complete this check, or record equivalent checks, before publishing identifiable material.

✓	Check	Question
☐	**Purpose**	Is there a clear Council purpose and an appropriate basis for using the material?
☐	**Awareness**	Have deliberately featured subjects been told the intended use and channel?
☐	**Agreement**	Has agreement been recorded where required, including suitable arrangements for children or adults at risk?
☐	**Objections**	Has anyone declined, withdrawn agreement or raised a concern?
☐	**Privacy**	Have unnecessary names, personal details, tags, screens and documents been removed?
☐	**Safety**	Does the material avoid unsafe practice and unnecessary disclosure of live locations, lone working, routines or security information?
☐	**Caption**	Is the caption accurate, necessary and unlikely to embarrass or place unwanted attention on a subject?
☐	**Approval**	Is publication through an approved Council channel and authorised by the appropriate person?

☐	**Storage**	Will the material and any associated permissions or restrictions be stored in an approved location?
☐	**Reuse**	Is any intended retention or reuse appropriate and understood?

Content / event
Proposed channel and date
Checked by and date
Approved by