

STUDENT PHOTOGRAPHS – GUIDANCE

1. Registration photographs supplied for the University identity card

The student photograph collected during the student registration process forms part of the student record. The photograph may be supplied by the student prior to student card collection using the upload facility in My Manchester. A visual check that the photograph matches the person is made before the card is printed. Alternatively a photograph is taken at the University when the student collects their card. The card is used for identification and security purposes and for access to services while the student is at the University.

2. Staff access and use of student record photographs

Staff are able to view student photographs in the CRM system, Campus Solutions or eProg dependent on their access to the system. Individual photographs are considered to be sensitive personal information, therefore care should be taken in accessing and using these photographs and they must only be used for the purposes for which consent has been obtained. See the general student collection notice (<http://documents.manchester.ac.uk/display.aspx?DocID=19049>) which students have consented to as part of the registration process.

NB Only photographs provided through the registration process are covered in the general collection notice.

Photographs of individual students e.g. class lists or lists of personal tutees may be printed from Campus Solutions for use by staff, only for reasons of identification. These photographs must be stored securely, have limited access and not be displayed in any way. Once the photographs are no longer needed, they must be disposed of securely – either permanently deleted, or shredded.

Photographs of students should not be taken during the admissions process – notes taken during the interview should be a sufficient prompt/reminder. There is no justification to request a photograph at this stage.

3. Photographs of groups

Verbal consent should be gained from those in attendance, giving anyone who does not wish to be included in the photograph the opportunity to exclude themselves whilst the photograph is taken. Individuals attending an event at which group photographs will be taken should be advised of this in advance where possible and given the opportunity to decline or absent themselves from a group photograph.

4. Scans of Passports which include photographs

International applicants who require a visa to enter the UK will provide an electronic scan of their passport including the photograph page, as verification of their identity. During the registration process, all international students are required to present their original passport and visa to confirm their immigration status. These are scanned and then stored on the document management system of the University. These documents are provided by individuals to verify their identity to enable the University to fulfil its obligations to UK Visas and Immigration.

5. Individual student photographs (other than those collected at registration)

Before taking or obtaining individual photographs for a specific activity, students must be provided with a specific collection notice which includes the following information:

- What is the reason for collecting the image, the purpose of processing?
- Will the image will be released to third parties and if so name them?
- Where the image will be used – on the website/ in a prospectus/on a notice board?

- How long will the photograph be kept for? Where/how will it be stored securely?
- Do the students have a method of opting out of the use of their photographs if they change their mind at a later date? i.e. do they know who to contact to ask for their photograph to be removed.

The student must consent in writing (a template for which can be found in section 6) and guidance on writing a collection notice can be found [here](#).

6. Publishing photographs on the University website and other publicity uses

Explicit consent from students must be gained before using their photographs in any form of publicity campaigns or promotion work, whether online or in hard copy. The following form should be used to obtain consent:

<http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=15671>

7. Storage

Students' photographs are sensitive personal data. Therefore, they must be stored securely, whether electronically or in hard copy. Access to them must be managed systematically, and you must ensure that they are not displayed without the consent of the individual concerned.

8. Retention and disposal

Photographs should be kept in line with [University Records Retention Schedule](#).

Where photographs have been taken in addition to the registration photograph, they must be retained and disposed of in accordance with the terms of the specific collection notice.

When you dispose of photographs either electronically or in hard copy, you must do so securely.

NB The responsibility for the use, security and disposal of the photographs lies with the local school/team or area who gained the consent to use the image. Responsibility for the photographs taken at registration lies with the Student Admissions and Administration Division.

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Date approved:	<i>April 2015</i>
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Supersedes:	
Previous review dates:	
Next review date:	
Related Statutes, Ordinances, General Regulations:	
Related policies:	
Related procedures:	
Related guidance and or University Records Retention Schedule codes of practice: Guidance on the Use of Images http://documents.manchester.ac.uk/display.aspx?DocID=23476 also covers CCTV	
Related information:	
Policy owner:	<i>Division of Student Admissions and Administration</i>
Lead contact:	<i>Director of Student Admissions and Administration</i>