



Process document covering GDPR, consent and protocols for imagery (videography and photos)

Purpose: The purpose of this process document is to ensure that all individuals involved in a **School of Medicine** videography or photography project are aware of [GDPR protocols](#) and compliance, and that they adhere to these practices **with the use of the below checklists**.

Pre-production/Production considerations

Location and Consent forms

When organising your videography or photography project, ask yourself these questions:

- Where will we be filming (what locations)?
- Do I need to request access and/or fill in any forms and submit them for location filming approval?
- Who do I need to notify regarding the filming (key staff, security, University Relations, Facilities)?
- Who will be featured in the imagery (the subjects)?
- Have you given careful thought to the following issues, as these will need to be made known to potential participants before they decide to sign the consent form:
 - where and how will the material be used?
 - for how long will the material be used?
 - what audiences will have access to the material?
 - will the material be available unrestricted on the internet globally, which means international data transfers that cannot be secured through safeguards?
 - have any intentions of international data transfers and resulting privacy risk been made known to potential participants before they agreed?
 - do you have clearly signposted measures in place, for the entire duration the material exists, to allow participants exercising their rights to eg withdraw consent, or to request erasure of their data?
- Is this a suitable time of the academic year? Does it coincide with exams (which can restrict access) or student holidays (if the project involves students)?
- Have the subjects signed consent forms (a compliance and accountability document that evidences that the UCD School of Medicine has data subjects' permission to use their image)?
- Have you printed additional consent forms to take to production in case other subjects need to sign a form on the day?
- Location - time of the year impacts natural light levels. Do you require any outdoor imagery?
- Has the photographer or videographer also been briefed regarding the above?



GDPR considerations

When organising your videography or photography project, ask yourself these questions:

- Could my location show private or sensitive information? Eg personal details on a computer screen, a person's name on a sample tube, a person's name on a name badge, results on open paperwork etc.
- What measure can I take to ensure that personal information is NOT included in the imagery? Eg 'Dummy' patient information on a screen, blurred background, removal of name badges, replacement props etc.
- Has the photographer or videographer also been briefed regarding the above?
- If the photographer or videographer is external to UCD, is there a data processing contract (DPA) in place with them?

Protocols

When organising your videography or photography project, ask yourself these questions:

- Are the subjects adhering to protocol apparel and safety measures? Eg wearing a lab coat, safety glasses and gloves in a lab environment, no jewellery, hair tied back, appropriate footwear etc. to ensure they are compliant.
- Are the subjects following protocol and best practice when it comes to how they are using/demonstrating equipment?
- Does a supervisor need to be present to ensure all protocols are being adhered to?
- Have the appropriate staff been consulted to ensure that the information being covered in the imagery is factually accurate?
- Has the photographer or videographer also been briefed regarding the above?

Post-production considerations

In post-production, ask yourself these questions:

- Have all consent forms been signed and put on file?
- On receipt of the imagery from the videographer/photographer, have I reviewed the imagery carefully to ensure that there is no consent, protocol or GDPR issue?
- If there are issues, have I ensured that those issues/impacted images are addressed promptly and, in some cases, removed entirely so that they are never circulated?
- Have the appropriate staff been shown the video/images before publication to ensure all GDPR protocols are being adhered to and that the information presented is factually accurate? Eg supervisors, key academic staff etc.
- Has the videographer/photographer been made aware of the above?
- Have you made sure the material is kept safe, secure and for only as long as permitted? Have you processes in place to deal with data subjects' requests, should they wish to exercise their rights under the GDPR?