WTC's Use of Media Policy

Aug 2026

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Purpose	To give clear details about the principles, responsibilities, and processes established at WTC for the taking, use, storage, and withdrawal of photographic and video images of individuals.
Enquiries	Enquiries about this Policy should be directed to the Director of Operations at doo@wtctheology.org.uk.
UKPRN	10030973
Legal Address	16-17 Clarence Parade, Cheltenham, GL50 3PA
Author	Director of Operations
Approved by	Comms Team
Next Review	August 2027
The staff member responsible for updating the content of this document	Chief Technology Officer
Policy / procedure relevant to	External – WTC website; MyWTC; Residential and Hub consent forms

1. Introduction

WTC believes the best marketing for WTC is best presented through the people who make up its learning communities, and that photographic and video images are a legitimate and valuable means of describing that work to potential students, supporters, partner churches, and the wider public. WTC equally believes that a person's likeness belongs to that person, and that the dignity afforded to every individual as one created in the image of God (Gen 1:26-28) requires that images be taken and used only with freely given, informed, and revocable permission.

As a Higher Education Institution and a registered charity, WTC is committed to pursuing this priority in accordance with its legal responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Policy details the specific rights and responsibilities that constitute the proper taking, use, retention, and withdrawal of images, and outlines the processes in place at WTC to ensure these rights and responsibilities in accordance with WTC's values.

These rights and responsibilities apply to WTC as an institution as well as to its individual members, including:

- all duly enrolled students of the college
- all members of WTC staff, Faculty, and/or those working on behalf of WTC, including commissioned photographers and videographers;
- all persons attending, speaking at, or otherwise taking part in events organised by and/or on behalf of WTC, whether at Residentials, WTC Hubs, the central office, or online.

2. What WTC Is Asking For

WTC asks permission to take photographs and video of you at their Residentials, Hubs and Events, and to use them to promote WTC and to report on its work, both on WTC's own channels and through advertising and the press.

WTC will not use an image for any purpose outside those set out in this policy.

3. Changing Your Mind

You may withdraw your permission at any time and for any reason, without giving a reason, by emailing info@wtctheology.org.uk.

On receipt of a withdrawal, WTC will:

- cease using your image in anything new;
- remove your image from the WTC website and social media channels;
- delete your image from the WTC image library; and
- confirm in writing once this is done, normally within one month.

WTC cannot always undo material already printed and distributed, or already published by a newspaper or partner organisation. In all such cases WTC will remove the image from everything still under its control.

4. Retention and Storage

Images are held in the WTC image library, managed by the Comms Manager, and are retained in line with WTC's Data Retention Policy, available at https://wtctheology.org.uk/policies.

Access to the image library is limited to the Comms team and to photographers working on a specific WTC project.

5. Where Images and Video May Be Seen

WTC's website and social media channels can be viewed anywhere in the world, and an image or video published may therefore be seen outside the United Kingdom. WTC's handling of this is set out in its Privacy Notice, available at https://wtctheology.org.uk/policies.

6. Limitations on Use

WTC will not:

- sell your image, or license it to any other party for that party's own commercial use;
- caption your image with your name, or publish a quotation from you, unless WTC has asked you separately and you have agreed;
- present an image of you as an account of your personal circumstances, or use it to illustrate another person's story; or
- publish your contact details.

7. Your Rights

You may ask for a copy of the personal data WTC holds about you, ask WTC to correct it, ask WTC to delete it, ask WTC to restrict how it is used, object to its use, or ask for it in a portable format. Such requests should be directed to WTC's Data Protection Officer, Carl Palmer, at dataprotection@wtctheology.org.uk.

If you are unhappy with how WTC has handled your personal data, please tell us. You may also complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113.

8. Lawful Basis

WTC's lawful basis for processing images under this Policy is consent, under Article 6(1)(a) of the UK GDPR. It is for this reason that the consent form is opt-in and that permission may be withdrawn at any time.

9. Declining to Take Part

Some people have good reasons not to appear in public material, and you are under no obligation to share those reasons with the Comms team. Declining consent on the form is sufficient in itself, and no explanation will be sought.

If it would help to speak to someone in confidence, contact the Designated Safeguarding Officer, whose details are set out in the WTC Safeguarding Code of Conduct.

10. Authority

The ultimate authority for the interpretation and implementation of this Policy is the Data Protection Officer, in discussion with the Director of Operations. The day-to-day implementation of the Code shall be the responsibility of the Comms Manager.

Where there is any doubt as to whether a proposed use of an image falls within the purposes set out in section 2, the Comms Manager will refer the matter to the Director of Operations or Data Protection Officer before the image is used.