

# Photographing Children Policy

## Introduction

The majority of occasions when people take photographs of children and young people are valid and do not provide any cause for concern.

Unfortunately, however, there are occasions when this is not the case, and these are some of the risks associated with photographing children:

- The collection and passing on of images which may be misused
- The identification of individual children to facilitate abuse
- The identification of children in vulnerable circumstances.

## Consent

Photographs and video images constitute 'personal data' and the processing of such data is subject to the requirements of the Data Protection Act 2018. Therefore, using images for SNAAP or other publicity purposes will require the consent of the individuals concerned and in the case of children, those with Parental Responsibility (with separate consent being required if photos are to be placed on a website or Social Media site).

The consent of parent/carers (and children/young people of appropriate age) should be sought and permission given before any photograph of a child or young person is taken, including explaining the context in which photographs will be used.

If photographs of children are taken for a specific event, campaign or project, which is outside of the terms of general consent, or if photographs are going to be published in different ways from those which consent has been given, then additional consent is required.

## Taking of Photographs

The following general principles should be kept in mind when anyone is taking photographs during SNAAP activities including events where the whole family attend.

Children and young people should be made aware of the dangers that can arise from people taking photos or filming them. It is key that children and young people feel happy with their achievements and have visual aids to reinforce their special moments.

## Reason and Purpose

Photographs should only be taken by an authorised person who has a suitable reason related to the child or organisation i.e. they are a parent, a relative or a member of staff.

Unless photographs are taken as part of a SNAAP activity, they should be used for an individual purpose not a public purpose e.g. not posted on the internet and not passed on to others unconnected with the child.

When photographs are being taken at events, parents/carers should be made aware that this is happening and that resulting photos may be used for publicity.

Parents must be aware of this policy and consent to it when they register with SNAAP. This permission will be re-requested annually.

There should be clear written expectations of professional photographers or the press who are invited to an event, making clear SNAAP's expectations of them in relation to safeguarding children and the use of any images. Such photographers will not be allowed unsupervised access to any child.

### **Appropriateness of Images**

No images should be taken of children that capture them in what are commonly understood as non-public activities like toileting or changing clothes, or which show body parts not usually visible in public settings or related to the particular activity e.g. swimming, athletics, gymnastics etc;

### **Identification of subjects**

No photograph should allow an unauthorised person to identify a child or their whereabouts. So, if using a full name there should be no photograph or, if using a photograph there should not be the full name. Particular care should be taken when photographing children in vulnerable circumstances, e.g. Looked After children or victims of parental violence. Risk in each individual case should be assessed and managed appropriately, with due regard to the child's wishes and feelings. Whoever is responsible for taking photos on the day should be made aware of any requirements or restrictions.

Personal details such as email addresses or home addresses, and telephone numbers should never be revealed.

### **Use of Mobile Phones**

Mobile phones are easily used as a camera without the subject being aware and their main function is often to transmit images to others not to be retained by an authorised person as a keepsake.

SNAAP discourages the use of personal mobile phones to take photos of children and provides a camera where photographs can be safely managed. Staff are told to ensure this camera is used at all times.

### **Looked After Children**

The photographing, video recording and filming of Looked After Children taking part in activities should be seen as a normal and essential part of their childhood.

Where the intention is for these photographs to be stored and/or published, parental consent is essential for all Looked After Children including those accommodated under Section 20. All requests for images to be taken or recorded of Looked After Children should be referred to the Social Worker responsible for the child in question.

Photographs should only be taken on cameras or mobile devices, and stored on devices, provided for this purpose by SNAAP, and not on staff members' personal devices such as mobile telephones, tablet or laptop computers, home computers, memory sticks, etc. They should not be uploaded to staff members' personal social networking accounts.

## Storage of Photographs

Images should never be stored on personal computers - they must be stored in a secure location to protect them from damage or being misused. This will ensure that no one can accidentally use them without being clear who they belong to and the context in which they may be used.

Cameras are to be kept in the locked storage unit in the office until the photos have been uploaded to a secure encrypted device, which is the stored in the safe.

Last Reviewed: 6<sup>th</sup> March 2020

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