



Image Use Policy

Trainees

Official use of Images/Videos of Trainees

Scope and aims of the policy

- This policy seeks to ensure that images and videos taken within and by *The Sand Project* are taken and held legally and the required thought is given to safeguarding all members of the community.
- This policy applies to ALL staff and other individuals who work for or provide services on behalf of the college (collectively referred to as 'staff' in this policy) as well as trainees and parents/carers.
- This policy must be read in conjunction with other relevant college policies including, but not limited to; safeguarding and child protection, anti-bullying, behaviour, GDPR, Online Safety, Code of Conduct policy.
- This policy applies to all images, including still and video content taken by *The Sand Project*.
- All images taken by *The Sand Project* will be used in a manner respectful of the Data Protection Principles. This means that images will be processed:
 - fairly, lawfully and in a transparent manner
 - for specified, explicit and legitimate purposes
 - in a way that is adequate, relevant limited to what is necessary
 - to ensure it is accurate and up to date
 - for no longer than is necessary
 - in a manner that ensures appropriate security
- The management team are responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the setting. This includes the management, implementation, monitoring and review of the Image Use Policy.

Parental consent

- Written permission from parents or carers will always be obtained using our consent form which is signed in accordance with this policy.
- A record of all consent details will be kept securely on file. Should permission be withdrawn by parents/carers at any time, then all relevant images will be removed and disposed of and the record will be updated accordingly.

Safety of images and videos

- All images taken and processed by or on behalf of The Sand Project will take place using allocated equipment and devices.
- Staff will receive information regarding the safe and appropriate use of images as part of their data protection and safeguarding training.
- All members of staff, including volunteers, will ensure that all images are available for scrutiny and will be able to justify any images in their possession.
- Images will not be kept for longer than is to be considered necessary. A designated member of staff (MD) will ensure that all photographs are permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use.

- All images will remain on storage devices that are suitably protected and will be logged in and out by authorised staff; this will be monitored to ensure that it is returned within the expected time scale.
- Management reserve the right to view any images taken and can withdraw or modify a member of staffs' authorisation to take or make images at any time.
- The Sand Project will ensure that images are always held in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act, and suitable child protection requirements, if necessary, are in place.
- Photographs will be disposed of should they no longer be required.

Publication and sharing of images and videos

- Images or videos that include trainees will be selected carefully for use, to ensure safe and positive work-related promotion of that person.
- The Sand Project will not include any personal addresses, emails, telephone numbers on video, on the website, in a prospectus or in other printed publications.

Safe Practice when taking images and videos

- Careful consideration is given before involving very young or vulnerable trainees when taking photos or recordings, who may be unable to question why or how activities are taking place.
- The Sand Project will discuss the use of images with trainees and young people in an age-appropriate way.
- A child or young person's right not to be photographed is to be respected. Images will not be taken of any child or young person against their wishes.
- Photography is not permitted in sensitive areas such as changing rooms, toilets, etc

Use of Closed-Circuit Television (CCTV)

- All areas which are covered by CCTV will be well signposted, and notifications are displayed so that individuals are advised before entering such vicinity.
- Recordings will be retained for a limited time only and for no longer than their intended purpose; this will be a for a maximum of 30 days. All recordings are to be erased before disposal.
- Regular auditing of any stored images will be undertaken by the MD.
- If cameras record activities taking place on the premises which are of a criminal nature or give any cause for concern, then information will be referred to the appropriate agency.
- CCTV cameras will be appropriately placed within the setting.

Use of photos and videos of trainees by others

Use of photos/videos by trainees

- The Sand Project will discuss and agree age-appropriate acceptable use rules with trainees regarding the appropriate use of cameras, such as places trainees cannot take the camera, for example unsupervised areas, toilets etc.
- The use of personal devices e.g., mobile phones, tablets, trainees' own digital cameras, is covered within the college online safety policy.
- All staff will be made aware of the acceptable use rules regarding trainees' use of cameras and will ensure that trainees are appropriately supervised when taking images for official or curriculum use.
- Members of staff will role model positive behaviour to the trainees by encouraging them to ask permission before they take any photos.
- Photos taken by trainees for official use will only be taken with consent and will be processed in accordance with GDPR and the Data Protection Act.
- Trainees will be made aware that photos/videos taken of other trainees must be used appropriately and safely.
- Photos taken by trainees for official use will be carefully controlled by The Sand Project and will be checked carefully before sharing online or via digital screens.
- Still and video cameras provided for use by trainees and the images themselves will not be removed from the setting.

Use of images of trainees by the media

- Where a press photographer is to be invited to celebrate an event, every effort will be made to ensure that the newspaper's, or other relevant media, requirements can be met.
- A written agreement will be sought with the press which will request that a pre-agreed and accepted amount of personal information (such as first names only) will be published along with images and videos.
- The identity of any press representative will be verified, and access will only be permitted where the event is planned, and where press is to be specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances.
- Every effort will be made to ensure the press abide by any specific guidelines should they be requested. No responsibility or liability however can be claimed for situations beyond reasonable control, and where the setting is to be considered to have acted in good faith.

Use of external photographers

- External photographers who are engaged to record any events will be prepared to work according to the terms of the college's online safety policy.
- Photographers will sign an agreement which ensures compliance with GDPR and the Data Protection Act.
- Images taken by external photographers will only be used for a specific purpose, subject to given consent.
- Photographers will not have unsupervised access to trainees and young people.

