



Photography and Images Policy

Document History			
Author	Elizabeth Brocklehurst	Ref and Document Version	Photography and Images Policy V4
Reviewed by	Lisa Green	Reviewed Date	01/08/2025
Approval	Board of Trustees	Approval Date	08/09/2025
Review Date	01/08/2026	Policy Number	STU-08
Publication	College website; College reception R:/Policies/PhotographyandImagesPolicy.pdf		

Policy Statement

The purpose of this policy is to provide guidance about the capture and distribution of images and photographs of individuals who use The Greenbank Project's (referred to as Greenbank) services including students, participants and customers. It applies to the capture of images on Greenbank premises or as part of official off-site events or visits.

Image capture includes photography and videoing (still or moving), obtained by any photographic device including still image cameras, video cameras, webcams, mobile phones and any other type of image capture device not specified here, whether digital or not, using technology existent now or in the future.

This policy is part of Greenbank's strategy for safeguarding the children, young people and vulnerable adults who use the services and to protect individuals' personal data.

It should be read in conjunction with our other policies, notably:

- Adult Protection and Safeguarding Policy and Procedures – PRJ-01
- Student Behaviour and Discipline Policy – STU-01
- Child Protection and Safeguarding Children Policy and Procedure – PRJ-02
- Electronic Mail, Internet & Intranet Policy – PRJ-03
- Information and Data Security Policy – STA-17
- Social Media Policy – PRJ-12

General principles

Every reasonable effort must be made to minimise the risk of inappropriate capture and distribution of photos and images.

This includes:

- securing consent from the subject for the use of their images (or their parent / guardian if under sixteen) for publicity purposes
- not using photographs of individuals, for publicity purposes, who no longer use Greenbank's services, without their consent
- ensuring that individuals are appropriately dressed
- ensuring that full names are not used alongside images in material which is publicly available
- not using an image of any child / young person who is subject to a court order
- storing images securely and accessible only by those authorised to do so
- storing images securely (whether physical or digital) with appropriate access controls
- ensuring staff are appropriately informed about this policy

Safeguarding

There may be a risk to the welfare of children / young people / vulnerable adults when they can be identified in photographs. This policy has been developed to make every effort to minimise this risk.

Where the capture or distribution of images raises a safeguarding concern, a designated safeguarding officer must be contacted immediately. Further details on safeguarding procedures are available in our Adult Protection and Safeguarding Policy and Procedures and Child Protection and Safeguarding Children Policy and Procedure.

Data protection

Photographs and video images of individuals are classed as personal data under the terms of the Data Protection Act 1998 and General Data Protection Regulation (GDPR) 2018.

Therefore, using such images for publicity purposes requires the consent of either the individual concerned or in the case of those under sixteen, their legal guardians. In line with the legislation, everyone responsible for using data must follow strict rules.

Under GDPR, data subjects have the right to access and amend any of their personal data that Greenbank holds.

Under GDPR legislation individuals have the following rights:

- The **right to be informed** about our processing of personal data;
- The right to have personal data **corrected if it inaccurate** and to have **incomplete personal data completed**;
- The right to **object** to processing of personal data;
- The right to **restrict processing** of personal data;
- The right to **have personal data erased** (the 'right to be forgotten').
- The right to **request access** to personal data and information about how we process it;
- The right to **move, copy or transfer your personal data ('data portability')**; and
- Rights in relation to **automated decision making** including profiling

Also, the right to complain to the information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: ico.org.uk.

Photography and image capture authorised by Greenbank

Images of individuals may be captured as part of the delivery of Greenbank services. Recordings of individuals will only ever be taken using official Greenbank equipment or by a designated external professional.

Staff must not take or transmit any images of students, participants or customers on any personal device.

Staff should also be aware that taking photographs of colleagues using personal devices should only happen with the permission of that member of staff.

Images of individuals must not be displayed on websites, social media, in publications or in a public place without specific consent from those featured in the image. The definition of a public place includes areas on Greenbank's premises where visitors have access.

Where photographs are taken at an event attended by large crowds, this is regarded as a public area, so it is not necessary to get permission of everyone in a crowd shot.

Photography and image capture by parents / visitors

Parents or visitors are not permitted to use a camera (including a mobile phone's camera facility) whilst on Greenbank premises.

However, legislation does not apply to photographs or films taken for personal use by family and friends and it is usual for parents to want to take photographs and videos of family members at celebratory events.

Exceptions to this rule are therefore made at such events, but parents / visitors must be advised that material is for personal use and should not include others if publishing images on the internet, including social media.

Photography and image capture by students

Staff will supervise and maintain control over any photographing or recording that students undertake during college related activities.

Publicity

Greenbank needs and welcomes publicity. Photographs can add interest to articles promoting our services. However, photographs must be used in a responsible way. Greenbank needs to respect individual's rights of privacy and be aware of potential safeguarding and data protection issues.

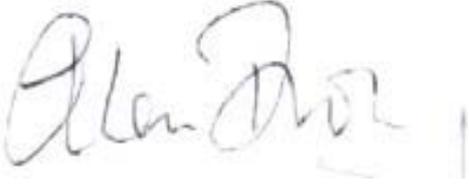
Monitoring

It is the responsibility of all Greenbank's staff to support and monitor this policy. Any concerns should be brought to the attention of a designated safeguarding officer.

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Document version: V4

Agreed by Greenbank Board of Trustees

A handwritten signature in black ink, appearing to read "Alan Irving", with a vertical line at the end.

Dr Alan Irving, Chairman