

# Parish of Holy Trinity and Christ Church, Richmond

## Policy **Taking and publishing of photographs and videos**

Document agreed by PCC, in November 2019

Document prepared by Keith Nurse

Date of this document November 2019

### Introduction

The taking and publishing of photographs and videos is an activity usually enjoyed by children and parents, and by adults who may be vulnerable, and can bring good publicity, but steps need to be taken to ensure that privacy is respected and no embarrassment is caused.

The issues are the same for still photographs and films, and regardless of the particular technology used. They herein apply to audio clips from individuals. For convenience these are all referred to as images.

Images constitute personal data under the Data Protection Act 2018 and the General Data Protection Regulation 2018. It is therefore a legal requirement that the consent of the adult who may be vulnerable, or child and his/her parent or guardian is obtained for the taking and using of images.

In our General Privacy Notice, we state that we use data "...To deliver the Church's mission to our community." This involves communication through publicity, which will on occasions include images of church members, events and activities.

We believe that photographs of events and people play an important part in capturing the history of our church. While continuing to take them, we want to ensure we keep within the law, and do not cause offence or embarrassment to people or go against their wishes.

### Who the policy is for

- Leaders of groups and activities that include children and vulnerable adults
- Staff Team members
- People who take photographs during Church Services and events
- Church members generally.

### Aims of the policy

The aims of this policy are

- To ensure we are legally compliant in the way we take and use images to further the ministry of our church
- To help to promote an environment where people feel safe, secure and comfortable.

This document includes a range of practical advice and guidance designed to help people in fulfilling the aims of the policy. Some are common-sense measures that people will already often adopt in the course of everyday life, but are included here as useful prompts about things that might be overlooked.

The advice and guidance draws on material from *A Safe Church*, a manual containing the Diocese of Southwark's policies, procedures and guidelines for safeguarding children and vulnerable adults, and responding to domestic abuse.

### General guidance

- We will not take pictures of children or adults who may be vulnerable without another adult present
- When an image is taken for possible publication or distribution, we will make those being photographed aware that it is being done. We will assume awareness if people are attending a photo-call, or the intention of taking images is included in the invitation to the event and people have been given the option of opting out
- We will ensure that any use of images reflects the diversity of age, ethnicity and gender of the activity

- We will ensure that professional or amateur photographers commissioned to photograph events are given a copy of this policy and agree to abide by it.

#### Consent

- We will display a notice on our premises, and print it occasionally in our Weekly Church Bulletin, to inform and remind people that we occasionally take photographs during Services, events and activities that we will retain for possible publication or distribution in a church magazine, on a website or via social media. We will give them the option of asking us to destroy any images in which they can be clearly identified. We will not routinely seek consent in writing
- However, for church groups and activities specifically involving children or vulnerable adults, we will use a consent form. A template consent form for using photographs of children and young people, and a template consent form for using photographs of vulnerable adults are attached
- The consent form for children and young people will be used for Fledglings, Scramblers, Climbers, Explorers, Quest, Refresh, Glow, The Bridge, Youth Alpha, Boy's Group, Girl's Group, Who Let the Dad's Out? and any similar groups and activities that replace them or are added to them
- If we wish to use a photograph of a child or vulnerable adult and discover we do not have written consent to do so, we will seek permission from, respectively, a parent or guardian of the child or the vulnerable adult
- We will not seek permission to display images of people on noticeboards or other displays in church (excluding in the foyer and other rooms before the entrance to the Trinity Room) where the photographs have been taken during Services, events and activities
- We will only use images for the specific purposes that we have stated. Written consent forms will specify what purposes the image will be used for, and how it will be stored if not destroyed. If we intend to use an image on the internet, this will be clearly stated at the time that consent is sought. We will seek further written consent if we plan to use images in ways other than originally specified
- For children (up to School Year 6), we will obtain written consent from parents or guardians
- For young people (from School Year 7), we will obtain written consent from parents or guardians and the young people themselves
- For vulnerable adults, we will only use images for a purpose which is explained to them, and to which they give their recorded and preferably signed informed consent; in other words, they understand and agree. They should see the photograph before being asked to give consent. The person who obtains the consent will sign and give their relationship to the person photographed, and the group or activity for which they work or volunteer
- If the vulnerable adult cannot give informed consent the images will not be used, unless the individual cannot be identified from the photograph
- For any photographs to be submitted to the Diocesan or Deanery for use in their communication (for instance in *The Bridge* Diocesan newspaper or on the Diocesan or Deanery website), we will obtain the consent of the parents or guardians or the vulnerable adults before such submissions are made
- In the case of a general photograph of a public event, such as a Church Service or barbecue, where no individual or group of people is the focus, we will still consider carefully where and how such photographs are displayed.

#### Publication and use of images

##### *For children*

- As a general guideline, if the image is to be published, we will avoid naming the child; and if a child is named, we will avoid using his or her image. However, there may be circumstances where, with the explicit, written consent of the child and his or her parent or guardian, we will use the child's first name and surname, for instance when promoting a specific performance or achievement
- If children are not fully dressed, for example, for sport, then we will
  - focus on the activity rather than a particular child
  - avoid full face and body shots
  - consider the age of the children involved.

##### *For adults who may be vulnerable*

- We will seek specific consent for images of adults where it is the intention to name the person in the image in an accompanying caption or article
- In all images we will respect the dignity of the person being photographed.

#### *Storage of images*

- We will be clear about whether images are to be retained for further use
- We will store images securely
- We will store consent forms securely.

#### *Images taken by participants*

- If, at a church-related event, children or adults who may be vulnerable use cameras or mobile phones to take photos of each other, or if parents or carers take photos of children or adults other than their own, we will advise them that these are for personal use only, and should not be displayed in any publicly accessible space, including on the internet or social networking sites. This will apply specifically, but not exclusively, to the annual Christingle and Nativity Carol Services, and to baptisms.

**Consent form for taking and publishing images of children**

At Holy Trinity Church we include images of children in our publicity with their consent and the consent of their parents or guardians. We have a duty of care to reduce safeguarding risks by ensuring that children remain unnamed in publications.

For completion by a named representative of the church

Name of church representative	
Role	

Specific purpose for which image is to be used

- Church noticeboard
- Church magazine
- Church website
- Church social media
- Other (please specify)

Where the image will be stored:

- Computer file (specify whose computer)
- Album
- Filing cabinet
- The cloud
- The image will be destroyed after use

For completion by parent or guardian and child

I consent to images of me/my child named below being used and stored, solely for the purposes specified above. I understand that the identity of my child will be protected in all publication of images.

Name of child	
Name of parent or guardian	
Address	
Signed (parent/guardian)	
Signed (child)	
Date	

Queries regarding this process should be addressed to

Michelle Rutter (Parish Safeguarding Officer)	michelle.rutter@htrichmond.org.uk	020 8404 1112
Graham Bamping (Parish Safeguarding Officer)	graham.bamping@htrichmond.org.uk	020 8404 1112
Dan Wells (Vicar)	dan.wells@htrichmond.org.uk	020 8404 1113

Your privacy is important to us and we are committed to keeping your personal information confidential and secure. For more information on how we process your data, please see our privacy notice which is available on our church website.

**Consent form for taking and publishing images of adults who may be vulnerable**

At Holy Trinity Church we include images all adults, including those who may be vulnerable in our publicity, but only with their consent.

For completion by a named representative of the church

Name of church representative	
Role	

Specific purpose for which image is to be used

- Church noticeboard
- Church magazine
- Church website
- Church social media
- Other (please specify)

Where the image will be stored:

- Computer file (specify whose computer)
- Album
- Filing cabinet
- The cloud
- The image will be destroyed after use

For completion by adult who may be vulnerable and the person taking their consent

I have seen the images that may be used for publication. I consent to these images being used and stored, solely for the purposes specified above.

I agree / do not agree (*delete as appropriate*) to my name being given in a caption or article accompanying the images.

Name of adult	
Address	
Signed	
Date	

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