



Taking, Storing and Using Images Policy

18/07/2018

1. Policy

This policy is intended to provide information to our social care customers (their advocates, parents or carers), staff, trustees and volunteers about how images are used by the Apuldram Centre. It also covers the organisation's approach to the use of cameras and filming equipment at events and on site premises. In addition to this policy our privacy notices and CCTV policy provide further information on how we capture, use and store images.

2. General Information

The Apuldram Centre is keen to promote positive images of staff, trustees, volunteers and vulnerable adults participating within our service and considers images as a necessary and ordinary function of running our social care services and promoting the work of the charity.

The Apuldram Centre takes steps to ensure that there are effective procedures in place to protect vulnerable adults in our care from the unacceptable use of smartphones and cameras within our services and protect the right for privacy for social care customers, staff, trustees and volunteers.

It is not the intention of the Apuldram Centre to prohibit those with a genuine interest in filming or photographing vulnerable adults participating in our activities, however, appropriate consent is required to be gained before images are taken and used.

Social care customers (their advocates, parents or carers), staff, trustees and volunteers who do not wish to have their images used are able to stipulate their preference on individual media consent forms. The Apuldram Centre will take reasonable steps to respect these preferences.

Our aim is to have clear guidance on the acceptable use of mobile phones, camera and filming devices that is understood and adhered to by all parties concerned without exception.

3. Use of Images in Organisational Publications and Media

Unless the relevant person has requested otherwise, the Apuldram Centre will use images to keep the Apuldram community updated on activities of the organisation and to celebrate achievements and for marketing and promotional purposes including:-

- On internal displays (including video clips) on digital and conventional notice boards across our premises;
- In communications with the Apuldram community including by email, Mailchimp and by post;
- On the Apuldram Centre's website, and where appropriate by the organisation's social media channels, e.g. Twitter and Facebook, BT Donate

- In the Apuldram Centre's information literature, in print and online, press and other external advertisements, grant funders online platforms or press releases

The source of these images will predominantly be the Apuldram Centre's staff or designated media volunteers who are subject to policies and rules on how and when to take such images, or a professional photographer engaged for marketing and promotional purposes. The Apuldram Centre will only use images of personnel in suitable dress and the images will be stored securely and centrally.

4. Use of Images for Identification and Security

All staff are photographed at the start of their employment and periodically thereafter. These photographs identify the member of staff by full name, job role and picture for the purpose of staff identity cards (internal and external identification) and staff lists (internal identification).

Images and biographical data of key organisational staff and trustees are published on the organisation's website.

All social care customers are photographed when they join or access a service from us following a trial placement and periodically thereafter. These photographs are used internally to identify the person by name and are used on individual support plans, rota boards, internal customer lists and to identify products individuals have made.

Images are stored on a designated media drive, where access is restricted to designated staff or media volunteers.

CCTV are in use across the daycare site, images captured on CCTV are used in accordance with our Privacy Notice and CCTV policy.

Further information can be obtained in our privacy notices.

5. Press

If the press are invited to an event, the Apuldram Centre will ensure that they understand our expectations of them in relation to adult protection.

The Apuldram Centre will:

- Provide a clear brief about what is considered appropriate in terms of the content of the photography;
- Issue press with identification which they must display at all times;
- Inform participants that a photographer will be present at the event.
- Not allow photographers unsupervised access to one-to-one photo sessions during the event;
- Not approve photo sessions outside the events or at a participant's home.

6. Guidelines for Cameras and Film by Staff, Trustees and Volunteers

- Staff, trustees and volunteers are only permitted to take photographs and films of customers within our service for valid reasons: for the recording of activities in action, recording of the learning and development of customers for observation records and profiles and for evidence for inspections, accident or safeguarding records and for marketing purposes.
- All images taken by staff, trustees and volunteers must be deemed suitable without putting the person in any compromising positions that could cause embarrassment or distress.
- Under no circumstances are staff, trustees or volunteers permitted to take photos or film in toilets, wash rooms, changing rooms or in tenant's bathrooms or bedrooms without prior consultation from the General Manager. If photographs need to be taken in a bathroom, i.e. photographs of customers we support washing their hands, then the General Manager must be asked first and staff will be supervised while carrying out this kind of activity. At all times the camera must be placed in a prominent place where it can be seen.
- Usage of personal smartphone, tablet devices or other camera and filming devices are to be kept to a minimum.
- The Apuldram Centre provides cameras, camera enabled smart phones and tablets that can be used by staff and volunteers to take photographs and films.
- Images taken must be downloaded directly to the Apuldram Centre's designated digital media store, IT user photo libraries or emailed to a staff email account as soon as possible, ideally daily or at least once a week.
- Images taken on the Apuldram Centre camera enabled devices and on personal devices, including smart phones must be deleted immediately after download.

7. Guidelines for Cameras and Film by Social Care Customers

- All social care customers are encouraged to look after each other and to report concerns about the misuse of cameras and other devices to a member of staff.
- When on our site, the use of cameras or filming equipment, including mobile phone and tablets, is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by customers in a manner that may offend or cause upset.
- All social care customers must ask the office or department manager for permission to take photographs or film staff.

8. Consent

The Apuldram Centre requires all vulnerable adults who access their services, staff, trustees and volunteers to complete a media consent form to allow themselves to be photographed and/or videoed. Where a vulnerable adult is unable to consent due to mental capacity, then their advocate, parent or carer will need to consent or a best interest decision will be taken. Refer to the consent form further in this policy.

9. How long we keep your information

We keep your images during and after your relationship with us ends and for no longer than is necessary for the purposes for which the image has been used. Further details on this are available in our Document Retention policy.

10. Misuse

In the event of the misuse of images, cameras or filming equipment in a way that breaches this policy, or other related policies, (Data Protection, Bullying and Harassment, Acceptable Use or Safeguarding), the Apuldram Centre reserves the right to refuse or withdraw permission to film or take photographs if these guidelines are not followed, including witnessing that images have been deleted or destroyed.

11. Compliance

The Apuldram Centre reserves the right to take appropriate action for noncompliance with this policy. For employees, disciplinary action up to and including termination of employment, or appropriate action in regards to volunteer and trustee roles.

12. Photographic Concerns

Concerns regarding inappropriate or intrusive photography or filming should be reported to the General Manager.



Appendix 1 - Media Consent Form

The Apuldram Centre offers a range of adult social care activities that enable us to support adults with learning disabilities. We will use images to keep the Apuldram community updated on activities of the organisation, to celebrate achievements, for marketing and promotional purposes, and as evidence for inspections, accident or safeguarding records and security and safety purposes, including:-

1. On internal displays (including video clips) on digital and conventional notice boards across our premises;
2. In communications with the Apuldram community including by email, newsletters and by post;
3. On the Apuldram Centre's website, and where appropriate by the organisation's social media channels, e.g. Twitter, Facebook, BT Donate
4. In the Apuldram Centre's information literature, in print and online, press and other external advertisements, grant funder's online platforms or press releases

We ask all of our social care customers, staff, trustees and volunteers to provide consent.

By giving the Apuldram Centre consent you are agreeing to your images being used, you agree to assign any copyright or any other right of ownership of these images to the Apuldram Centre.

Name of Individual	
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Please tick one of the options below in response to your consent

I give consent for my images to be used by Apuldram

I do not consent to my images being used by Apuldram

Name:

Signature:

Date:

Declaration:

I am giving consent for myself / I am giving consent for someone in my care.
(Please delete as applicable)

***Images used for staff security and identification do not form part of this consent as it is contractual that items such as Photo IDs are worn when working for the Apuldram Centre.**



Appendix 2 - Photo and Video Information Form



Can Apuldram take a photo or video of you?



Can Apuldram put your photo in a leaflet or newsletter?



Can Apuldram put your photo or video on social media or our website?



Can Apuldram put your photo in the paper?




Can Apuldram display your photo at Apuldram for others to see or on a poster?



The Apuldram Centre will always need to use your photo to help keep you safe and so staff know who you are, we explain this in our privacy notice.

Appendix 3 - Taking Photos or Videos of Others Our Rules

<p>You must follow these rules when taking photos or videos at Apuldram</p>	
<p>You must ask your friends if they want to be photographed or filmed. If they say no you must not take their photo or film them</p>	
<p>You must not take photos of Apuldram staff unless you have their permission to do so</p>	
<p>You must not take photos in these places or of private parts of other people's bodies at the Apuldram Centre or Hub Club</p>	
<p>If you break these rules you might not be able to bring your phone, camera or Ipad to Apuldram Centre or the Hub Club</p>	