**Introduction**

This policy provides information about how images of young people and families are normally used. It also covers JAMES approach to the use of cameras and filming equipment at sessions and on our premises by our staff, volunteers, service users, partner organisations and the media.

It acknowledges that our obligation under the General Data Protection Regulation (GDPR) have an impact on how everyone associated with JAMES takes, stores and uses photographs and videos.

It applies in addition to JAMES service consent agreement and any other information we may provide, about a particular use of service users’ images, including e.g. signage about the use of CCTV, JAMES privacy policy and data storage and retention.

**General Points**

Certain uses of images are necessary for the ordinary running of JAMES; other uses are in the legitimate interests of the organisation and the community and unlikely to cause any negative impact on service users. JAMES is entitled to process images and take decisions about how to use them, subject to any reasonable objections raised.

Service users or their guardians who consent to accept a service from JAMES are invited to indicate agreement to JAMES using their images as set out in this policy. However, service users/ their parents or guardians should be aware of the fact that certain uses of their images may be necessary or unavoidable if, for example, they are included incidentally in CCTV or a photograph.

We hope those who wish to limit their own or their young person’s images, should contact the JAMES Management Team via email ([enquiries@jamesuk.org](mailto:enquiries@jamesuk.org)) or telephone (01274 483075). JAMES will respect the wishes of service users and their parents or guardians wherever reasonably possible, and in accordance of this policy.

Parents/ guardians should be aware that, from the age of 12 and upwards, the law recognises young peoples’ own rights to have a say about how their personal information is used – including images.

**Use of service users images in publications and video**

Unless the relevant service user, or their parent/ guardian, has requested otherwise, JAMES may use images of its service users to keep all parties updated on our activities, and for marketing and promotional purposes, including:

* In communications with; young people, families, staff, trustees, former service users, our communities and other professionals, including by email on JAMES intranet and by post;
* On JAMES website and social media channels, e.g. Twitter, Facebook and Instagram. Such images would not normally be accompanied by the pupil’s full name without their permission.
* On internal displays, in digital and conventional formats within JAMES premises
* As part of our celebrations of programme achievements, including end of year events, public showcases and awards nights
* In JAMES publicity documentation and in online, press and other external advertisements for the organisation. Such external advertising would not include any specific names.
* In JAMES reports and service documentation, such as; funders reports and monitoring and applications for resources. Where any names are stated within such documentation would be synonyms so as not to identify individuals specifically.

The sources of these images will predominantly be JAMES staff (who are subject to policies in how and when to take such images), or occasionally other service users (for example on a project). JAMES will only use images of pupils suitably dressed and the images will be stored **securely and centrally**. Occasionally a professional photographer or video maker will be used for promotional purposes.

**Use of images and documents for identification and security**

Some service users arrive at JAMES with photographs on their documentation, for example; school referral forms, these photographs identify individuals by name and are kept centrally and securely.

CCTV is in use on JAMES premises and can capture images of pupils. Images captured on the CCTV system are used in accordance with the **Privacy Policy** and any other information or policies concerning CCTV which may be published by JAMES from time to time.

Some of our families work requires us to confirm identity and eligibility of adults via sharing images or documents of them such as passports and letters confirming National insurance numbers. These will only be stored on phones for a limited time and deleted at the earliest opportunity. **Staff must ensure that if using Whats app or other apps that your settings do not store to your photo roll and you have a password or face ID to log in.**

**Security of pupil images**

Professional photographers and the media are accompanied by a member of staff when on JAMES’ premises and are not left alone with service users.

JAMES takes appropriate technical and organisational security measures to ensure that images of service users held are kept securely on JAMES systems, and protected from loss or misuse. All staff are given guidance on this policy, and on the importance of ensuring that images of pupils are made and used responsibly, only for JAMES purposes or our funders for evidencing purposes, and in accordance with our policies and the law.

**Use of cameras and filming equipment (including mobile phones) by staff**

* Many staff have access to work mobile phones that can be used for taking photos for work purposes listed above. Staff should not take photographs on personal devices, such as mobile phones, unless there is no other option. Any photographs taken on mobile phones or digital cameras will be passed on to the Management Team or put on the appropriate location on the secure JAMES intranet as soon as possible. They should then delete them from their device at the earliest opportunity and should not be backed up to clouds or storage.
* Photographs of service users (including those for accreditation purposes) should be passed onto the appropriate area on the intranet as soon as is reasonably practical, and then deleted. Staff are encouraged to only pass on and save those photos of a high quality.
* Video recorded for one-off use should be deleted after that use. Video with additional value should be stored on the appropriate place on the intranet.
* Staff are not permitted to share images of JAMES service users in the public domain, without the approval of the Management Team.

**Use of cameras and filming equipment (including mobile phones) by service users**

All service users are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of staff. Learners must not take or share images of each other and any indecent image sharing will be passed to the police.

**Mobile phone use**

In addition to the points above which include mobile phone use, the following must also be adhered to by the JAMES staff team. JAMES provides various staff members with a mobile phone.

* All JAMES mobile phones must be password protected or thumb or face/eye ID protected.
* JAMES mobile phones should not be left unattended or left in vehicles and must be kept on the person at all times when at work.
* All work phones should be stored in a safe place at home, ideally not in a handbag or near the door and if possible locked away.
* Any documents or pictures must be deleted as soon as possible and not held or stored on phones and should be checked regularly to make sure this is kept up to.
* Photo’s or work data should not be backed up to clouds, storage or photo rolls.
* If any phone is lost or stolen this must be reported to your line manager urgently and they will have to pass this onto relevant parties and funders.

**Sanctions**

The misuse of images, cameras, phones or filming equipment in a way that breaches this policy, or any of JAMES related policies is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant policy as appropriate.

**Publication and review**

This policy will be published on the JAMES website and a link to it shared with staff, parents and any appropriate third parties. Service users will be made aware of the points within this document.