

Guidance for taking and publishing images, photographs and videos, including on websites

For the Church of Christ the King, Kettering.

This Policy and Procedure was adopted at a Parochial Church Council (PCC) meeting held on:

Date:

Signed: Warden on behalf of PCC

Signed: Vicar and Mission Leader

*Reviewed annually by the policy owner and brought to the PCC for review
and approval every 3 years. Next review by PCC due January 2026.*

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Introduction

Taking and publishing of images, photographs and videos is 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 or films, and regardless of the particular technology used. They also apply to audio clips from individuals. For convenience they are all referred to as images. Images count as personal data under the Data Protection Act 1998. 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.

1. General guidance

Do not take pictures of children or adults who may be vulnerable without another adult present.

When an image is taken for publication or distribution, those being photographed should be aware that it is being done. Awareness can be assumed if:

- People are attending a photo-call
- The intention of taking images is included in the invitation to the event and people are given the option of opting out
- A 'film-free' area is clearly marked by notices within the church at a live-streamed service or event

Ensure that any use of images reflects the diversity of age, ethnicity and gender of the activity.

Ensure that professional or amateur photographers commissioned to photograph events are given a copy of this guidance and agree to abide by it. A designated photographer should be identified by staff or the activity leader, given a photo pass from the Church Office (if appropriate or necessary) and a memory card or camera to take the images on. The images should be stored and edited on a CTK PC or password-protected hard drive/PC that is stored in the Church Office.

All images or video recordings of children and young people should be taken using church equipment as far as possible. Any photographs taken on personal devices must be transferred appropriately and as soon as possible; the original image should be deleted from the device and any related cloud-based locations if automatically transferred. It is the responsibility of those taking images to ensure that no inappropriate or illegal content is stored on their device when bringing it onto church premises.

If an event is being live-streamed, all those present should be made aware of where it is being live-streamed to and a 'film-free' area should be marked, and people given the opportunity to move to this area should they wish before the service or event begins. Occasionally there are situations where children/young people are invited to the front of the service to participate, eg lighting an advent candle, holding up a picture. This could mean that they can be seen on the live-stream camera and on the recording of the service. In this situation the service leader should remind parents/guardians that the service is being live-streamed and recorded and that children should only come forward if the parent/guardian is in agreement with the child/young person being seen. The decision to allow the child or young person to appear on screen in the situation is with the parent or guardian.

2. Consent

Except in the above circumstances, consent should be obtained before taking and using images, and a chance to opt out must be given.

Written Consent

Consent need not be in writing if it is not proposed to publish the images in any way; but if they are going to be displayed, used in a newspaper or magazine (including the Diocesan or parish newspaper or magazine), or put on a website or social media, then specific written consent should be obtained or a clear opportunity to opt out of the images should be communicated to anyone involved.

Images should only be used for the specific purpose agreed by the person photographed. Written consent must specify what purposes the image will be used for, and how it will be stored if not destroyed. If the intention is to use an image on the internet, this must be clearly stated at the time that consent is sought. Further written consent is required if images are to be used in other ways than originally specified.

For children, written consent must be obtained from parents or guardians of the children.

For vulnerable adults, images should only be used for a purpose which is explained to them, and to which they give their recorded and preferably signed informed consent, ie they understand and agree. They should see the photograph before being asked to give consent. The person who obtains the consent should sign and give their relationship to the person photographed, and the name and address of the organisation for which they work or volunteer. If the vulnerable adult cannot give informed consent, the images should not be used, unless the individual cannot be identified from the photograph.

For any photographs submitted for use in any Diocesan communication (for instance in the Diocesan newspaper, or on the Diocesan website), it will be assumed that the parish has obtained the consent of the children, parents/guardians or vulnerable adults before such submissions are made.

In the case of a general photograph of a public event, such as a church public event, where no individual or group of people is the focus, prior consent of everyone is not required. It is still appropriate to consider carefully where and how such photographs should be displayed.

A copy of the Church of Christ the King Kettering privacy statement and the intent to take photos and videos notice should be on display in the church building so that people can be directed to it should they have any questions about our standard procedure.

3. Publication and use of images

For children:

As a general guideline, if the image is to be published, avoid naming the child; and if a child is named, 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, it is permissible to use child's full name, for instance when promoting a specific performance or achievement. If children are scantily dressed, eg for swimming, then:

- 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:

For the purpose of Church policy and guidance, the definition of "vulnerable adult" is contained in the Safeguarding and Clergy Discipline Measure 2016 that defines a "vulnerable adult" as a person aged 18 or over whose ability to protect himself or herself from violence, abuse, neglect or exploitation is significantly impaired through physical or mental disability or illness, old age, emotional fragility or distress, or otherwise; and for that purpose, the reference to being impaired is to being temporarily or indefinitely impaired'.

Please note that the Care and Support Statutory Guidance issued under the Care Act 2014 (14.2) by the Department of Health uses the term 'adults experiencing, or at risk of abuse or neglect' in order to assess eligibility to statutory social care services.

Specific consent should be sought for images of adults where it is the intention to name the person in the image in an accompanying caption or article. All images must respect the dignity of the person being photographed.

Storage of images

- Be clear about whether the image is to be retained for further use.
- Store the image securely on a password-protected hard drive or PC.
- Where hard copies exist, they should be stored securely in the Church Office.
- Ideally, store consent forms with the image for future reference.

In cases where staff need to use personal phones to take photos, they should not keep the images, but should delete them as soon as possible. Images can be saved on the hard drive at church if necessary. Staff should be mindful of transportation of sensitive information and photographs on memory sticks, laptops or other devices between church and home. Encryption should be used to restrict unauthorised access in the event of loss or theft.

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, they should be advised where possible that these can be used for personal use only and advised that they should not be displayed in any publicly accessible space, including on websites or social media.

Newspapers and other print media are bound by the Press Complaints Commission Code of Practice, of which the latest version was issued in June 2004. Legitimate journalism is a 'special purpose' under the Data Protection Act, which exempts it from the requirement of security, but there are numerous restrictions on photographing children. These are not likely to be relevant to church use but advice if needed should be obtained from the Diocesan Press Officer.



The Church of Christ the King Photo “Opt-Out” Form

At Christ the King Church, Kettering (CtK), we include images of all adults, including those who may be vulnerable, in our publicity, but only with their consent. We also include images of children in our publicity with their consent and that of their parents or guardians. We have a duty of care to reduce the risk of inappropriate contact by ensuring that children must remain unidentifiable in publications. This form is for those who no longer wish to have their picture posted to the church website or social media accounts. Please fill out this form and return it to the Church Office.

I hereby withhold my permission for the CtK to use photographic images of the following individual(s):
(please fill in names below)

Adult Name(s):

Child Name(s):

in or on the following media: (please tick those that apply)

- CtK website & Livestream
- CtK social media accounts (Facebook, Twitter, Pinterest, YouTube)
- CtK physical publications (leaflets, notice sheets, newsletters)
- CtK internal noticeboards

I, _____, am the parent or legal guardian of the above-named child(ren).
I have read and understand the provisions of this document.

Parent/Guardian Signature:

Date:

*If you give permission for the use of your photographic image to appear on the website, social media and publications of CtK this form does not need to be signed and returned.
(This opt-out form is valid from the date received by the church office)

Final Approved

Notice on Photographs and Video Recording and Social Media

At Christ the King Church Kettering (CtK), we offer multiple events and activities. Photographs may be taken during these activities by a representative of the church. These images may be used for Church publications and/or may be posted to the Christ the King Church Kettering website or social media accounts.

Published images to the church website or social media accounts will never include names of adults or children (first or last) or any other personal information unless further verbal or written permission is obtained prior to use.

Pictures taken and used will also aim to not have a specific focal point of an individual person unless consent has been obtained.

Social Media

Whilst many people enjoy engaging with and using Social Media (Facebook, Twitter, Pinterest, Instagram, Snapchat, other sites & apps), we hope that you appreciate that not everyone wants to have all the memories of their family and friends shared online for anyone to see or indeed use for undisclosed purposes.

Please could we ask that you ensure any pictures taken by you are for you personally and not posted to social media, especially when other group members that may not wish the pictures to be posted are visible in the picture.

In the same way as CtK would seek a person's consent before using images or videos, please could you be considerate towards others and do the same.

Notice on Photos and Video Being Taken

Please be aware that today at The Church of Christ the King, Kettering we plan to take photos and video of the activities taking place.

By joining us today and remaining on the grounds of The Church of Christ the King Church Kettering, you grant:

- (i) your consent to the taking of pictures and videos in which you may be seen
- (ii) your consent to those images being stored in line with The Church of Christ the King Data Protection and Privacy Policy
- (iii) your consent to The Church of Christ the King Kettering using the pictures and videos in internal displays or publications and/or being posted to the church website or social media accounts

If you do not wish to appear in any pictures or videos taken today, please talk to a member of the leadership team.

Alternatively please sit in the “film-free” area

or

contact the Data Controller via the Church Office, Deeble Road, Kettering, NN16 7AA or office@ctk.org.uk ☎ 01536 517553.

Photography and Filming at The Church of Christ the King Kettering - Privacy Notice

The purpose of this Privacy Notice is to explain what to expect when we collect and process your personal information in relation to photography and/or filming and streaming of church services, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. The Data Protection Officer is Sabina Davies.
2. Personal information is collected for purposes of:
 - Recording and uploading, or live-streaming, services from our church, online, in order to reach out to those who are unable to attend in person, or who wish to participate in our services remotely; and
 - Managing the media release forms in relation to the filming and streaming of church services online
3. The categories of personal data we collect are:
 - Image – we may capture your image whilst filming the church service;
 - Name and contact details – we will record your name and the contact details provided on the media release form.We also process “special categories” of information which may include:
 - Religious belief – by taking part in the service, this may indicate religious belief;
 - Archiving – certain services may be retained permanently for historic purposes.
4. We collect and use personal data using consent and explicit (written) consent.
By signing the consent form and the media release form, you are consenting to us using your data for the purposes set out above.

You may withhold your consent by sitting in a “film-free” area of the church before filming or photography starts. Such areas will be clearly marked by notices in the church.

In the filming areas, once live-streaming or filming has started, or group photographs have been taken, consent cannot be withdrawn because your data cannot be permanently removed from the internet, nor can a group video or photograph be edited to remove your image.

If you are a regular attendee, your consent will be renewed every 3 years, but you can withdraw your consent to being filmed in future services at any time by contacting the church office as set out in section 9 below and sitting in the “film-free” area when attending church services if you do not want to be filmed.

You may be asked to consent on behalf of children aged 16 years or under attending with you. Please consider whether they would want their images to be uploaded to the internet.

5. We will be sharing photographs and recorded or live-streamed services with the public by uploading them to social media and other internet sites, such as Zoom, Facebook, Twitter etc.
6. This (section 5 above) means your data may be stored outside the UK. Each platform has its own privacy policy which describes how your data is used and protected.
7. We will keep your data for up to 3 years, except for certain special services, which may be retained permanently for archival purposes.
8. You have the following rights regarding your personal data:
 - **Your right of access** - You have the right to ask us for copies of your personal information.
 - **Your right to withdraw consent** – You have the right to withdraw your consent as described in section 4 above*.
 - **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete*.
 - **Your right to request erasure** - You have the right to ask us to erase your personal information in certain circumstances*.
 - **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances*.

*The rights to withdraw consent, or request erasure or restrict processing are limited, i.e. once the data is uploaded online we are no longer able to erase or restrict the processing of individual images. In addition, the right to rectification only applies to the processing of your name and contact details, it cannot apply to your image captured on film.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. You can exercise your rights by contacting us at the contact details below.

9. If you have any complaints or queries regarding this processing activity or wish to exercise your rights, please contact [insert name and contact details].

You have the right to make a complaint at any time to the Information Commissioner on 0303 123 1113 (local rate), or online at: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>