

1. Purpose of this Policy

This policy sets out how British Guardianship takes, uses, stores, and shares photographs and video recordings of students under its care. It ensures compliance with safeguarding law, UK GDPR, the Data Protection Act 2018, and AEGIS Standard 2.7.5, which requires guardianship organisations to have consent and safeguards in place before using student images in publicity materials or online.

2. Scope

This policy applies to:

- All British Guardianship staff
- Local Coordinators
- Homestays
- Volunteers
- Contractors (e.g., external photographers)

It covers all images taken for:

- Publicity
- Website and social media
- Printed marketing
- Internal training
- AEGIS accreditation evidence
- School communications (where authorised)

3. Principles

British Guardianship recognises that:

- Children must be kept safe when images are taken or used
- Parents and students have the right to control how their images are used
- Consent must always be informed and specific
- Images of students must never be used in a way that puts them at risk
- No image will be used without written permission

These principles reflect safeguarding best practice, including NSPCC image safety guidance.

4. Parental Consent

4.1 British Guardianship will **not** take or use any photographs or videos of a student without **explicit, written parental consent** via the Photo & Video Consent Form.

4.2 Consent will be sought for specific uses, including:

- Website
- Printed materials
- Social media
- Digital newsletters
- Internal training
- AEGIS inspection evidence

4.3 Parents may withdraw consent at any time.

4.4 No image will ever be used where a court order restricts publication.

5. Student Consent (13+)

For students aged 13 and above, British Guardianship will also seek the student's agreement before taking or using their image, in line with best practice.

6. Image Capture Rules

Staff, Local Coordinators, and homestays must:

- Ensure images are appropriate and respectful
- Never photograph a student in a state of undress or in private areas
- Avoid images that focus on a single child unless necessary and approved
- Never identify a child by full name alongside an image unless explicitly authorised
- Ensure backgrounds do not reveal personal information
- Ensure images do not breach safeguarding risks

This reflects standard guidance from the NSPCC.

7. Storage & Security of Images

- All images must be stored securely on company-managed, password protected systems
- No images may be stored on personal phones, personal laptops, or personal cloud accounts
- Images must be deleted once no longer required for the purpose for which consent was obtained
- Access is restricted to authorised staff only

8. Sharing Images

- Images will never be shared with third parties without written parental permission
- Images will never be sold or used for commercial gain
- Images may be used for AEGIS accreditation evidence only if permitted by parents
- Images must never be shared on personal social media accounts
- Only authorised company channels may be used

9. External Photographers / Contractors

Where British Guardianship engages external photographers:

- They must be supervised at all times
- They must comply with this policy
- They may not retain any images
- They must sign a confidentiality agreement
- They may not contact students directly

10. Breaches

Any breach of this policy will result in:

- Immediate reporting to the DSL
- Possible removal from duties
- Review under safer recruitment and disciplinary procedures
- Potential referral to external safeguarding authorities

11. Review of this Policy

This policy will be **reviewed annually**, in line with **AEGIS Standard 2.10 requirements** for annual policy reviews.

12. Ownership

The DSL is responsible for:

- Policy implementation
- Training
- Oversight of image related safeguarding concerns
- Keeping records of consents