

Use of photographs and images of children on web sites and other publications.



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Personal information will only be made public with consent – this includes photographs. Because a web site can be accessed from countries that do not have Data Protection legislation, it counts as an overseas transfer, and is subject to the European Union Data Directive 95/46/EC and the Electronic Communications Data Protection Directive 2002/58/EC, as implemented under national law.

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Photographs can be used as a means of identifying children when they are accompanied with personal information, for example, - this is X who is a member of the *Something Club* and who likes Westlife. This information can make a child vulnerable to an individual who may wish to "groom" that child for abuse. Secondly the content of the photo can be used or adapted for inappropriate use. There is evidence of this adapted material finding its way onto websites, consisting of child abuse images.

Organisations and those providing services or activities to children and young people need to develop a policy in relation to their use of images of children and young people on their websites and in other publications. They will need to make decisions about the type of images they consider suitable and that appropriately represent their activity, without putting children at increased risk. You should ensure that parents are aware of and support your policy. If organisations are aware of the potential risks and take appropriate steps any potential for their misuse can be reduced.

Advice to organisations:

- Consider using models or illustrations if you are promoting an activity; and
- Avoid the use of both the first name and surname of individuals in a photograph. Restricting naming to first name only reduces the risk of inappropriate and/or unsolicited attention from people.

Rules to remember:

- If the child is fully named, avoid using their photograph;
- If a photograph is used, avoid fully naming the child;
- Ask for parental permission to use an image of a young person. This ensures that parents are aware of the way the image of their child is representing the organisation or activity. A 'Parental Consent Form' (see below) for use of images of children is one way of achieving this;
- Consider asking for the child's permission to use their image. This ensures that they are aware of the way the image is to be used to represent the activity. A children's permission form is one way of achieving this;
- To reduce the risk of inappropriate use, only use images of children in suitable dress. With regard to the actual content it is difficult to specify exactly what is appropriate given the wide diversity of activities offered by organisations'. However there are clearly some activities - swimming, gymnastics and athletics for example - when the risk of potential misuse is much greater than for others. With these activities the content of the photograph should focus on the activity not on a particular child and should avoid full face and body shots. For example shots of children in a pool would be appropriate, or, if poolside, waist or shoulder up; and
- Create a recognised procedure for reporting any concerns regarding the use of inappropriate images. Follow your child protection procedures, ensuring both your designated child protection officer and local children's services or the Police are informed.

First steps:

- Establish the type of images that appropriately represent the organisation and the activity for the internet. Apply an increased level of consideration to the images of children and young people used in the website; and
- Think about the level of consideration you give to the use of images of children in other publications, for example the processes involved in choosing appropriate images for the newsletter or magazine.

Guidelines for use of photographers at events:

- Provide a clear brief about what is considered appropriate in terms of content and behavior;
- Issue the photographer with identification, which must be worn at all times;
- Inform children and parents that a photographer will be in attendance at an event and ensure they consent to both the taking and publication of films or photographs;
- Do not allow unsupervised access to children or one-to-one photo sessions at events; and
- Do not approve/allow photo sessions outside the events or at a young persons home.

If parents or other spectators are intending to photograph or video at an organised event they should also be made aware of your expectations.

- Children and parents should be informed that if they have concerns regarding inappropriate or intrusive photography these should be reported to the event organiser or official who will act in the same manner as they would with any other child protection concern.

For more information please contact the **MD105 Data Protection Officer**.

Related Links



[Standard Parental Consent Form](#)