



TIDWORTH TOWN COUNCIL

Photography Policy

Document History	Date	Adopted Date	Minute Ref	Summary of Changes
Original	Sept 26	01/09/26	26/122	NEW
Revision 1				
Revision 2				
Revision 3				

Next review date September 2028

1. Policy statement

Tidworth Town Council is committed to protecting the privacy, dignity, and safety of children, young people, adults at risk, councillors, staff, volunteers, contractors, and members of the public.

The Council recognises that photographs and video recordings are useful for promoting Council activities, publicising events, and recording community life. However, images must be used responsibly, lawfully, and respectfully.

This policy sets out the principles and procedures for taking, using, storing, and sharing photographs and video recordings in connection with Council business.

2. Purpose

This policy aims to:

- support lawful and appropriate use of images
- protect individuals from misuse of their image
- ensure compliance with data protection requirements
- support safeguarding practice at Council events and activities
- provide clear guidance to councillors, staff, volunteers, contractors, and event organisers

3. Scope

This policy applies to:

- councillors
- employees
- volunteers
- contractors
- agency workers
- event organisers acting on behalf of the Council
- anyone taking photographs or video recordings for Council purposes

It applies to all Council-related activities, including:

- meetings
- events
- consultations
- community activities
- use of Council facilities
- printed publications

- websites and social media
- internal records and reports

4. Legal and policy context

Tidworth Town Council will handle photographs and recordings in line with its obligations relating to data protection, confidentiality, safeguarding, equality, and good governance.

This policy should be read alongside:

- the Council's Safeguarding Policy
- the Council's Data Protection and Privacy arrangements
- the Council's Code of Conduct
- social media and communications procedures
- event management and risk assessment arrangements
- health and safety procedures

5. Definitions

For the purposes of this policy:

- Photograph means any still image, whether taken on a camera, phone, tablet, or other device.
- Video recording means any moving image recording, including live streaming where relevant.
- Personal data means information relating to an identified or identifiable person.
- Consent means a clear agreement given freely by the person, or by a parent or legal guardian where appropriate.

6. General principles

The Council will:

- use images only for legitimate Council purposes
- be transparent about when photography is taking place
- obtain consent where required
- respect any objection to being photographed
- avoid intrusive or inappropriate images
- give special care where children or adults at risk may be included
- store images securely and only for as long as needed

7. Taking photographs and video recordings

7.1 General arrangements

At Council meetings and events, people should normally be informed if photography or filming is taking place. This may be done by:

- notice at the venue
- inclusion in event publicity
- a statement at the start of the meeting or event
- visible signage

Where practicable, a nominated person should manage official Council photography.

7.2 Respecting objections

If a person does not wish to be photographed or recorded, their wishes should be respected wherever reasonably possible.

The Council will not require anyone to explain their reasons for objecting.

7.3 Private spaces

Images must not be taken in toilets, changing areas, or any other location where a person has a reasonable expectation of privacy.

8. Children and adults at risk

8.1 Safeguarding

Particular care must be taken where children, young people, or adults at risk are present.

The Council will ensure that photography and filming arrangements do not place anyone at risk or create discomfort, pressure, or distress.

8.2 Consent

Where images of children or adults at risk are taken for Council publicity or promotional purposes, consent should normally be obtained in advance from:

- a parent or legal guardian for a child, or
- the individual concerned, where they have the capacity to give informed consent

8.3 Event controls

For events involving children or adults at risk, the Council will consider:

- whether photography is appropriate at all
- whether a designated photographer should be used
- whether certain areas should be camera-free
- whether consent forms or registration notices are needed
- whether images should avoid naming individuals

8.4 Identification

The Council will avoid publishing names alongside photographs of children unless there is a clear reason to do so and consent has been obtained.

9. Use of images

Council images may be used for purposes including:

- website content
- social media posts
- annual reports
- newsletters
- posters and leaflets
- press releases
- internal records
- consultation and engagement material

Images must not be used in a misleading, harmful, or embarrassing way.

The Council will avoid using images in contexts that could reasonably be expected to cause distress or reputational harm.

10. Social media and online publication

Where images are published online, the Council will take reasonable steps to reduce risk, including:

- checking that consent has been obtained where needed
- avoiding unnecessary personal details
- considering whether images show vulnerable people or sensitive locations
- removing images if a valid objection is received and removal is appropriate

The Council should recognise that material published online may be copied or shared beyond its control.

11. Consent, objection, and withdrawal

Consent should be:

- informed
- voluntary
- specific
- capable of being withdrawn

A person may object to being photographed or ask for an image to be removed.

Where consent is the basis for use, the Council will act promptly on withdrawal where reasonably possible.

Where images are held in printed publications or archived materials, removal may not always be practical, but future use should stop where appropriate.

12. Staff, councillor, volunteer, and contractor responsibilities

Anyone taking photographs or video recordings for Council purposes must:

- act professionally and respectfully
- follow this policy
- follow any event-specific instructions
- obtain or check consent where required
- report any concern about misuse, coercion, or safeguarding risk
- not take personal photographs for Council publicity without permission

13. Personal devices and unofficial images

Personal devices may only be used for Council photography where authorised and where images are handled in line with Council expectations.

Images taken for personal use should not normally be used for Council publicity without permission.

Councillors, staff, volunteers, and contractors should be mindful that personal social media posts may create privacy, safeguarding, or reputational issues.

14. Storage and security

Images used by the Council should be stored securely.

The Council will:

- limit access to authorised persons only
- avoid unnecessary duplication
- delete images when no longer needed
- ensure images are not stored on unsecured shared devices without good reason

Where images are held as part of Council records, they should be managed in line with the Council's retention arrangements.

15. Copyright and ownership

Unless otherwise agreed, photographs and recordings taken on behalf of the Council for Council business are Council records and may be used by the Council for its lawful purposes.

Where external photographers or contractors are engaged, the Council should clarify in writing:

- who owns the images
- what the images may be used for
- how long they may be retained
- whether consent responsibilities sit with the Council or the contractor

16. Complaints and concerns

Any complaint about photography, filming, or image use should be reported to the Town Clerk.

Concerns involving safeguarding, harassment, privacy, or misuse of images should be dealt with promptly and, where necessary, referred under the Council's safeguarding or disciplinary procedures.

17. Monitoring and review

This policy will be:

- reviewed every two years, or earlier if required
- updated in line with changes in legislation, guidance, or Council practice
- considered alongside the Council's safeguarding and data protection arrangements