Policy for the Taking of Clinical Photographs for GP Resident Doctors

Policy

NHS England Workforce Training and Education North East and North Cumbria

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1. Purpose

This policy sets out the standards and requirements for the taking, storing, and use of clinical photographs by GP doctors in training. Its purpose is to ensure that clinical photography is undertaken safely, ethically, and lawfully, with appropriate consent, respect for patient dignity, and compliance with professional and organisational guidance. Clinical photography supports assessment and referral in general practice but carries elevated medico legal and information governance risk. Clinical images constitute sensitive personal data and may undermine patient dignity or confidentiality if taken or managed inappropriately. Clinical photography must therefore never be regarded as routine and requires clear clinical justification, explicit informed consent, use of approved systems, and appropriate oversight to ensure practice is lawful, ethical and professionally defensible.

2. Scope

This policy applies to all GP Resident Doctors working within GP practices and training environments. Clinical supervisors overseeing GP Resident Doctors should ensure that this policy is discussed and understood at induction of GP placements.

3. Principles

Clinical photographs:

- Must only be taken where there is a clear clinical justification
- Require explicit informed consent
- Must respect patient dignity, privacy, and confidentiality. **PHOTOS OF INTIMATE AREAS MUST NEVER BE TAKEN.**
- **MUST NEVER** be taken covertly or without the patient's knowledge.
- Must comply with GMC guidance, local consent policies, and information governance requirements
- The Camera App on the photography device should **NEVER** be used to take photographs. The appropriate software must be used which does not store pictures on the device's hard drive.

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4. Clinical Indication

Clinical photographs may only be taken where there is a clear and documented clinical reason, such as:

- Referral to the tele-dermatology service such as two week wait referrals.
- Supporting diagnosis or management
- Monitoring a condition over time
- Seeking advice or a second opinion (with appropriate safeguards)

Photographs must not be taken on the assumption that certain conditions (e.g. skin lesions) are routinely photographed.

5. Consent

Before any clinical photograph is taken, explicit informed consent must be obtained from the patient.

The patient must understand:

- Why the photograph is being taken
- How it will be used
- Where it will be stored
- Who may have access to it

Consent must be:

- Given voluntarily
- Specific to the photograph being taken
- Recorded clearly in the clinical notes

Implied consent is not sufficient for clinical photography. Where the patient lacks capacity, the clinician must follow the relevant legal framework and learning environment policy.

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6. Professional Conduct

GP doctors in training must:

- Act in accordance with GMC Good Medical Practice
  Good medical practice - professional standards - GMC
- Follow GMC guidance on consent and confidentiality
  https://www.gmc-uk.org/professional-standards/the-professional-standards/confidentiality
- Seek advice from their clinical supervisor if unsure at any stage

7. Devices and Storage

Personal mobile phones or personal devices **MUST NEVER** be used to take clinical photographs. Images **MUST NEVER** be stored on personal devices, personal cloud storage, or shared via unsecured messaging platforms.

Images must be stored securely in line with:

- Learning environment information governance requirements
- General Data Protection Regulation Policy

8. Use and Sharing of Images

Clinical photographs:

- Must only be used for the purpose for which consent was obtained
- Must not be used for teaching, presentations, or publication without separate explicit consent
- Must not be shared informally or outside approved systems

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9. Documentation

The following must be recorded in the clinical notes:

- The clinical indication for the photograph
- Confirmation that informed consent was obtained
- How and where the image was stored

10. Induction and Training

This policy must be included in practice induction for GP doctors in training and highlighted at initial training programme induction. The use of devices to take photographs for clinical purposes must be demonstrated as part of induction.

11. Monitoring Compliance and Effectiveness

This policy will be reviewed periodically or sooner if required following changes in guidance or organisational learning.

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