PHOTOGRAPHY POLICY

Safe, lawful images for learning, communication and publicity

EFFECTIVE: SEPTEMBER 2026 | REVIEW: SEPTEMBER 2027 | IMPACT AP

1 | SCOPE AND LEADERSHIP

Covers photographs, video, audio-visual recordings and identifiable images made for Impact, including lessons, visits, events, portfolios, websites and social media. Kate Willis authorises intended uses; Kirsty Lampkin advises on data handling. CCTV follows the separate CCTV Policy. A learner's image is personal information and may reveal sensitive or safeguarding details.

2 | PURPOSE AND LAWFUL BASIS

Identify the purpose, audience, lawful basis and retention before recording. Separate learning evidence from publicity; permission for one does not automatically cover the other. Do not assume Impact has public-task powers for every use. Explain the privacy information accessibly and document the decision. Seek appropriate advice for sensitive or unusual recording.

3 | CONSENT AND LEARNER CHOICE

For optional publicity use specific, informed consent and record the channels agreed. Consider the learner's understanding and wishes alongside parental authority where applicable; adult learners decide for themselves where able. A learner who does not want a photograph should not be pressured, punished or excluded from the activity. Provide a practical alternative for evidencing learning.

4 | SAFEGUARDING RESTRICTIONS

Check restrictions before recording or publication, including care arrangements, family risk, protected identity and court-related concerns. Do not publish a learner's whereabouts in real time or combine identifying details unnecessarily. Avoid displaying names, addresses, medical information or screens in the background. Consult the DSL when circumstances change or any doubt arises.

5 | APPROVED DEVICES AND ACCOUNTS

Use authorised work devices and approved storage and publishing accounts. No personal-phone recording or personal cloud uploads of learners. Restrict access to staff who need it and protect devices with appropriate security. Transfer images promptly to approved storage and remove temporary copies according to the agreed process. Report loss, misuse or accidental sharing immediately.

6 | DIGNITY AND APPROPRIATE CONTENT

Record only images necessary for the stated purpose, in suitable clothing and situations. Never photograph intimate care, changing, injuries for publicity or distress for entertainment. Staff must not request images through private messages. Obtain specialist safeguarding advice before recording sensitive evidence; child-protection documentation follows its own controlled procedure.

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7 | VISITORS, EVENTS AND PROVIDERS

Explain recording rules to photographers, families, visitors and external providers before an activity. Agree responsibilities, permissions, storage and publication in writing for commissioned photographers. Do not permit unsupervised access to learners. Event participants must respect others' privacy and must not record in toilets or changing spaces; staff act on intrusive or unsafe recording.

8 | PUBLICATION CHECKS

An authorised staff member checks consent or other lawful basis, audience, captions, background details and safeguarding restrictions before posting. Use minimal identifying information and approved channels. Disable unnecessary location data and avoid revealing routines. Commercial partners, clubs and commissioners need their own agreed lawful arrangements; Impact permission is not a general licence for onward use.

9 | STORAGE, WITHDRAWAL AND REQUESTS

Maintain an image/permission record, secure storage and a purpose-based retention schedule. Check permissions again before reusing older images. Where consent is withdrawn, stop future consent-based use and remove controlled copies where required, explaining practical limits on materials already distributed. Refer access, erasure or other data-rights requests promptly to Kirsty for lawful handling.

10 | MISUSE, AI AND REVIEW

Do not upload identifiable learner images to unapproved AI tools or create manipulative, sexualised or humiliating alterations. Report deepfake, image-sharing or unauthorised publication concerns through safeguarding and data-protection routes. Preserve necessary evidence safely without circulating illegal material. Leaders review image use and permissions at least annually and after incidents.

11 | POLICY CONTROL AND REVIEW

Policy owner: Kate Willis, Principal and Proprietor. Effective date: September 2026. Scheduled review: September 2027, or sooner after relevant changes, incidents or feedback. Record actual governance approval and implementation decisions and brief staff on their duties. These policy dates do not assert that approval, staff training or operational checks have already occurred. Use the Complaints or independent reporting route for concerns about implementation.

12 | SOURCES AND RELATED DOCUMENTS

ICO and DfE guidance on images and data protection; Impact Data Protection, Online Safety and CCTV policies.

gov.uk/guidance/data-protection-in-schools/taking-and-using-photos-and-videos-and-using-cctv-in-schools

Check current versions and apply according to Impact's legal and commissioning status.