Connecting Boroughs

Photography, Video & Consent Policy

Charity Number: 1211291

Policy Owner: Connecting Boroughs CIO

Approved by: Board of Trustees

Review Frequency: Annually, or sooner where required

Next Review: September 2027

1. Policy Statement

Connecting Boroughs may use photographs, video and audio recordings to celebrate activities, demonstrate charitable impact, communicate with the community, support fundraising and provide evidence to funders.

The dignity, privacy, safety and safeguarding of beneficiaries must always take priority over promotional or publicity needs.

2. Purpose

This policy sets standards for taking, storing and using photographs and recordings.

- protect children, adults at risk and other beneficiaries;
- ensure consent and privacy choices are respected;
- reduce safeguarding and data-protection risks;
- provide clear expectations for staff, volunteers, contractors and visitors;
- ensure images are used accurately and respectfully; and
- prevent inappropriate sharing or personal use of charity images.

3. Scope

This policy applies to photographs, video, livestreams, audio recordings and other identifiable visual or recorded content created during Connecting Boroughs activities.

It applies to trustees, staff, volunteers, photographers, videographers, contractors, partner organisations and others authorised to create or use such content.

4. Consent

Connecting Boroughs will obtain appropriate consent or identify another appropriate lawful basis before using identifiable images where required.

Consent arrangements should explain, in clear language, how images or recordings may be used, for example on the charity's website, social media, printed materials, funding reports or publicity.

Consent for one purpose should not automatically be treated as permission for every possible future use.

5. Children and Young People

For children, appropriate consent should normally be obtained from a parent or person with parental responsibility where required for the intended use.

The child's wishes and level of understanding should also be respected. A child should not be forced to be photographed or filmed simply because adult consent has been provided.

Where consent has not been provided, reasonable arrangements should be made to prevent the child from being identifiable in published material.

6. Adults at Risk and Vulnerable Circumstances

Additional care must be taken when photographing or filming adults at risk or people experiencing domestic abuse, homelessness, serious financial hardship, immigration difficulties or other sensitive circumstances.

Consent must not be obtained through pressure, and receiving charity support must never depend on agreeing to publicity.

Where identification could create a safety risk, the person should not be identifiable even if an image would otherwise be useful for publicity.

7. Domestic Abuse and Safeguarding Risks

Images must not reveal the location, routine, accommodation, school, refuge, contact details or other information that could place a survivor, child or family at risk.

Where there is a known safeguarding or domestic abuse concern, the charity should consider whether any identifiable image should be taken or published at all.

8. Taking Photographs and Video

People taking photographs or recordings on behalf of Connecting Boroughs should:

- follow the agreed consent arrangements;
- avoid images that could embarrass, exploit or humiliate a beneficiary;
- avoid unnecessary close-ups where consent or identification is uncertain;
- not photograph children in situations where privacy is reasonably expected;
- follow instructions from the activity lead or safeguarding lead; and
- stop recording if a safeguarding or safety concern arises.

9. Personal Phones and Devices

Where personal devices are used for authorised charity photography, images must be handled carefully and transferred to the appropriate charity storage as soon as reasonably practicable.

Charity images must not be retained for personal use, added to personal cloud albums unnecessarily or shared through personal social-media accounts without specific authorisation.

Sensitive images should not remain indefinitely on personal devices.

10. Professional Photographers and Videographers

External photographers and videographers should be given clear instructions about safeguarding, consent, permitted use and storage.

They should be identifiable to event staff and should not have unrestricted access to children or beneficiaries merely because they are providing photography services.

Where appropriate, contractual arrangements should address ownership, confidentiality, storage and deletion of content.

11. Events and Group Photography

At events where photography is expected, attendees should be informed through suitable notices, registration information or announcements where appropriate.

Reasonable arrangements should be made for people who do not wish to appear in identifiable photographs or recordings.

Public-event notices do not remove the need for additional care where children, adults at risk or sensitive personal circumstances are involved.

12. Parents, Families and Visitors Taking Images

Connecting Boroughs may set reasonable restrictions on photography by parents, families or visitors where needed for safeguarding, privacy or venue requirements.

Images taken by members of the public are outside the charity's direct control, but staff and volunteers should challenge or report behaviour that creates a safeguarding concern.

13. Use of Names and Personal Details

Full names, addresses, schools, contact information or other identifying details should not normally be published alongside children's images unless there is a clear and appropriate reason and the necessary safeguards are in place.

Beneficiary stories should use only the information necessary for the intended purpose.

14. Social Media and Website Use

Images posted on official social-media accounts or the charity website must be authorised and suitable for public viewing.

An image being shared in an internal WhatsApp group does not mean that it is approved for public publication.

Public posts must comply with the Social Media & Communications Policy.

15. Fundraising and Funding Reports

Photographs and recordings may be used to demonstrate charitable impact where this is appropriate and consistent with the relevant consent and privacy arrangements.

Beneficiaries must be represented with dignity. Images of distress, poverty or vulnerability must not be used in an exploitative or misleading way to increase donations.

16. Storage and Security

Images and recordings containing identifiable people are personal information and must be stored securely.

Access should be limited to people who need the material for an authorised charity purpose.

Files should be organised so that consent restrictions or special safeguarding instructions can be identified where necessary.

17. Retention and Deletion

Images and recordings should not be kept indefinitely without a continuing purpose.

Connecting Boroughs will periodically review stored media and securely delete content that is no longer required, subject to any legal, contractual, safeguarding or evidential reason for continued retention.

18. Withdrawal of Consent

Where use is based on consent, an individual may withdraw that consent for future use.

Connecting Boroughs will take reasonable steps to stop future use and remove material from channels under its control where appropriate.

It may not always be possible to retrieve printed materials already distributed or copies independently shared by third parties, and this should be explained where relevant.

19. Requests to Remove Images

Requests to remove an image or recording should be treated respectfully and referred to the appropriate charity lead.

Where a request raises a safeguarding or safety concern, the material should be reviewed urgently.

20. Media and Third-Party Requests

Images of beneficiaries must not be provided to journalists, partner organisations, funders or other third parties without an appropriate basis and authorisation.

Any restrictions attached to the original consent or safeguarding decision must continue to be respected.

21. Inappropriate Photography or Recording

Any concern about covert, sexualised, intrusive, exploitative or otherwise inappropriate photography or recording must be reported immediately.

Where a child or adult may be at risk, the Safeguarding Policy must be followed and relevant evidence preserved appropriately.

22. Data Breaches

Loss, theft, accidental publication or unauthorised sharing of identifiable photographs or recordings must be reported promptly under the charity's data-protection procedures.

The charity will assess the risk and determine whether further action or external notification is required.

23. Responsibilities

The Board of Trustees has overall responsibility for ensuring appropriate governance of personal information and safeguarding.

The Founder/CEO and relevant activity leads are responsible for ensuring consent and photography arrangements are appropriate for activities they oversee.

Everyone taking or using images on behalf of Connecting Boroughs must follow this policy.

24. Related Policies

This policy should be read alongside:

- Safeguarding Policy;
- Data Protection & UK GDPR Policy;
- Privacy & Confidentiality Policy;
- Information Sharing & Record-Keeping Policy;
- Social Media & Communications Policy;
- Code of Conduct; and
- Serious Incident Reporting Policy.

25. Monitoring and Review

Photography and consent arrangements should be reviewed following safeguarding concerns, complaints, data breaches or significant changes to the charity's communications activities.

This policy will be reviewed by the trustees at least annually.

Approved by the Board of Trustees: _____

Date approved: _____

Signed on behalf of the trustees: _____

Next review date: _____