Photography, Filming and Image Use Policy

Document Control

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1. Purpose

This policy sets out how South Cumbria Skills Exchange (SCSE), operated by Whamos Training and Development CIC, captures, stores, uses and shares photographs, audio recordings and moving images involving learners, staff, visitors and third parties.

Filmmaking and image-based work are central to SCSE's Alternative Provision offer. This makes a clear, well-understood image policy especially important. We treat images as personal data and, where they reveal characteristics such as ethnicity, disability or health, as special category data under UK GDPR.

This policy reflects UK GDPR, the Data Protection Act 2018, the Human Rights Act 1998, KCSIE 2024, and the Equality Act 2010.

2. Scope

This policy applies to all photographs, audio recordings, video, and moving images:

- Captured by SCSE staff, volunteers or contractors
- Captured by learners as part of SCSE activity (filmmaking projects, learning evidence, portfolio work)
- Captured on SCSE premises by visitors with our agreement
- Held by SCSE for any purpose, including learning records, marketing, internal communications, awarding-body evidence, and creative production

It does not cover personal photographs taken by staff or learners outside SCSE activity, which are governed by the relevant Acceptable Use Policy and Social Media Policy.

3. Lawful basis

Under UK GDPR, SCSE relies on one of the following lawful bases for processing images:

- **Consent** — for marketing, social media, public-facing creative output and showreel use
- **Public task / legitimate interest** — for learning evidence, internal moderation, awarding-body submissions, and safeguarding
- **Vital interests** — in safeguarding emergencies, where images are needed to protect the learner or others
- **Legal obligation** — for example, retention required by an awarding body

Where images reveal special category data (health, disability, ethnicity, religion, etc.), additional safeguards apply and an explicit, written, named consent is sought.

4. Consent

Consent is required before any photograph, audio recording or moving image of a learner is:

- Used in marketing material, on the SCSE website, or on social media
- Shared with third parties beyond the commissioning school, awarding body, or other agencies with a legitimate role
- Used in showreels, festival submissions or public screening
- Retained beyond the duration of the placement
- Used in a way other than that originally agreed

For learners aged under 18, consent is sought from the person with parental responsibility AND from the learner themselves (assent). A learner over 13 who clearly objects to their image being used can override parental consent — the learner's view is decisive on use that affects their dignity, privacy or future opportunities.

Consent is:

- **Specific** — for a named purpose (e.g. "for use in SCSE's website 2025–26 and in a short documentary submitted to the Cumbria Film Festival")
- **Informed** — with clear information about who will see the image, where it will be hosted, for how long, and how to withdraw consent
- **Freely given** — placement at SCSE is not conditional on giving consent
- **Documented** — recorded on the SCSE Image Consent Form, signed and dated, held in the learner's file
- **Time-limited** — typically valid for the duration of the placement plus an agreed retention period; thereafter consent must be re-confirmed

Consent can be withdrawn at any time. On withdrawal, SCSE will remove the relevant image from any platform within SCSE's control as soon as reasonably practicable and certainly within 30 days. Where the image is on a third-party platform (a festival website, a social media post, a published documentary), SCSE will request removal but cannot guarantee removal from material already in distribution. This is explained at the point of consent.

The Directors jointly act as the Image Consent Record Holder for SCSE. Together they decide on any use of a learner's image not explicitly covered by the original consent.

5. Filmmaking projects

Filmmaking is a creative form that places learners as participants and as creators. Both roles raise distinct considerations.

Learners as subjects in front of camera:

- Each learner appearing in a filmmaking project requires consent from parent/carer (under 18) and assent from the learner
- Consent is for a specific project, specific intended use, and specific distribution
- Learners are briefed on what the film is about, who will see it, and their right to withdraw
- A learner may withdraw consent at any point during production. Where the withdrawal is during pre-production, scenes are reshot or removed. Where during post-production, the learner's footage is removed if technically possible.

Learners as filmmakers behind the camera:

- Learners are taught to seek consent from anyone they record
- Learners are taught how to brief subjects before filming
- Learners are taught when an image should not be captured (in private spaces, where the subject is identifiable and has not consented, where children or vulnerable adults are present without consent)
- Filmmakers' own welfare is considered: learners are not asked to film content that they find distressing

Project records:

For each filmmaking project SCSE maintains:

- A project brief outlining purpose, intended use, distribution, and timeline
- A consent log for each person appearing on camera
- A separate consent log for each filmmaker
- A safeguarding risk assessment for the project, especially where filming involves off-site locations or vulnerable subjects
- A retention schedule for raw footage, edited material, and project files

6. Photography in everyday activity

Day-to-day photography (recording learning, capturing portfolio evidence, documenting practical work) takes place only:

- With consent recorded on the standard Image Consent Form
- For an agreed purpose
- Using SCSE-owned devices wherever possible
- Without identifying personal information attached to the image filename or metadata

Photographs of groups including learners who have not consented to being photographed are not taken. Where a group photograph is taken, learners who have not consented stand outside the frame.

7. Personal devices

Staff, volunteers and contractors do not use personal devices to photograph or record learners. Where exceptional circumstances require personal device use (e.g. SCSE-owned device unavailable on an off-site activity), images are transferred to SCSE storage and deleted from the personal device the same day, with the Director(s) informed.

Learners may use personal devices on site only as agreed in the Acceptable Use Policy and only for SCSE-permitted purposes. Photography of staff or other learners on a personal device, without consent, is not permitted.

8. Storage and security

Images are held in line with the Secure Data Handling and Data Protection Policy:

- Encrypted cloud storage with role-based access
- Locked physical storage for any printed images
- Files named without learner identifiers wherever possible
- Strict access controls — only those with a legitimate role in the relevant project can access the images
- Backups encrypted and held separately
- Off-site copies (e.g. for awarding-body evidence) only via secure transfer

Images are not stored on personal devices, personal email, or personal cloud accounts.

9. Sharing and publication

Images may be shared with:

- The commissioning school, awarding body, or other agency with a legitimate role, where consent allows and need is established
- The learner and parent/carer themselves (a copy of the learner's own work is always offered)
- Other professionals supporting the learner, on a need-to-know basis with consent
- The general public via SCSE marketing or creative output, only where specific consent for that use has been recorded

We do not share, post, or publish:

- Images of learners that identify them by name without consent for that specific use

- Images that show learners in any state of undress, in a bathroom or changing context, or in any setting that could be exploitative
- Images where the learner is identifiable as a looked-after child or in any other safeguarding-sensitive context
- Images of learners in distress, even if subsequently composed, without the learner's clear current assent

10. Retention

Default retention periods are:

- **Learning evidence** — retained for the duration of the placement plus seven years (or longer if required by an awarding body)
- **Marketing and public-facing material** — retained as long as the consent is current, with annual review
- **Filmmaking project files** — retained for the duration of the project plus a defined archive period agreed at consent
- **Raw footage / outtakes** — disposed of within 12 months of project completion unless explicit consent for longer retention is given

At the end of the retention period, files are securely deleted and any backups purged within the cycle.

11. Visitors, contractors and third parties

Visitors to SCSE who wish to photograph or film on the premises must:

- Agree in writing in advance with the Directors
- Be supervised at all times
- Operate within the same consent rules as SCSE staff
- Provide a copy of any material to SCSE for review before public use

This includes journalists, documentary makers, awarding-body inspectors (where filming is part of their visit), and parent/carer events.

12. Images of staff and volunteers

Staff and volunteers may also appear in SCSE images. Their consent is sought in line with this policy. Staff have the same right to withdraw consent as learners. Images of staff are not used in any way that would mislead the public as to the staff member's role, qualifications or views.

13. Subject access requests

A learner (or parent/carer for an under-18 learner who lacks capacity to make the request themselves) can request access to any images SCSE holds of them. Subject access requests are handled in line with the Secure Data Handling and Data Protection Policy and responded to within one calendar month.

14. Data breaches

Where there is a loss, theft, unauthorised disclosure or accidental publication of images, the Secure Data Handling and Data Protection Policy applies. Where the breach is likely to result in a risk to the rights and freedoms of an individual (which is highly likely for images involving children), the breach is reported to the Information Commissioner's Office within 72 hours.

15. Working with commissioning schools

For learners placed via a commissioning school or local authority, image consents agreed by the school remain relevant. SCSE checks at the point of placement which consents are in place and seeks additional SCSE-specific consents only for purposes the school's consent does not cover (e.g. SCSE-led filmmaking project, SCSE marketing material).

16. Training

All SCSE staff and volunteers receive training on this policy at induction, including:

- What consent looks like in practice
- When to ask
- How to record
- The special considerations for filmmaking work
- How to withdraw consent on behalf of a learner where their best interests require it

Refresher training is provided annually and whenever the policy changes.

17. Concerns and complaints

A learner, parent, carer or other individual concerned about how SCSE has handled an image should raise it informally with the Directors or formally via the Complaints Policy. Complaints to the Information Commissioner's Office can be made at ico.org.uk.

18. Related policies

This policy should be read alongside:

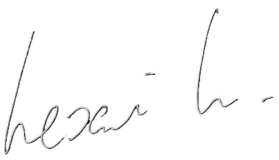
- Safeguarding Policy
- Secure Data Handling and Data Protection Policy
- Acceptable Use Policy
- Social Media Policy
- Online Safety / E-Safety Policy
- Confidentiality Policy and Agreement
- Trips and Off-Site Activities Policy

19. Policy review

This policy is reviewed annually by the Directors, or sooner if statutory guidance or our use of images changes.

Approval & Review

This policy has been approved on behalf of the Directors:

Elizabeth Amos-Milburn *Co-Director*	**Alexandra Gager-Liebhart** *Co-Director*
	

Date of approval: 18th May 2026

Next review: 18th May 2027

Schedule 1 — Record of Changes

Version	Date	Nature of Change
001	18th May 2026	Initial published version included in the Combined Policies and Procedures 2026 edition.