



Photography, Filming and Image Sharing Policy

Purpose and Scope

Growing Resilience in Teens (GRIT), a Charitable Incorporated Organisation (CIO), registered charity number 1176272, recognises the importance of safeguarding children and young people in relation to the creation, storage, and sharing of photographs and films.

The purpose of this policy is to ensure that any images—whether still or moving—created by GRIT, on behalf of GRIT, or by those attending GRIT-facilitated activities, are managed safely and appropriately.

This policy outlines how GRIT:

- Enables positive use of photography and filming to celebrate achievements, raise awareness of important issues, and support fundraising and promotional activities.
- Identifies and reduces the risks associated with the potential misuse or misdistribution of images.
- Provides clear guidance for staff, volunteers, young people, and families on how images will be collected, stored, and shared in compliance with safeguarding standards and data protection law.

The scope of this policy applies to all GRIT employees, volunteers, contractors, service users, and their families who may be involved in the creation or use of images within GRIT activities.

1. Aim

The aim of this policy is to:

- Support staff, volunteers, young people, and families to use photography and filming safely, responsibly, and in line with GRIT's safeguarding and data protection responsibilities.
- Enable the positive use of images to document and celebrate achievements, promote GRIT's work, and contribute to organisational records.
- Provide clarity on when and how consent must be obtained before images are captured, stored, or shared.
- Prevent the misuse, inappropriate distribution, or unauthorised storage of images, ensuring that the rights and wishes of children, young people, and their families are respected at all times.

2. Image use

For clarity, images created or shared by GRIT are grouped into three categories:

Category	Description	Examples
Internal use	Images used only within GRIT for identification, reference, or record-keeping.	Stored on GRIT files or held securely by authorised committee members.
Publicity / promotional use	Images used by GRIT to raise awareness, promote services, or showcase achievements.	GRIT website, official social media accounts, printed leaflets, displays, GRIT Film, GRIT Film website.
External media use	Images shared with external organisations for coverage or wider distribution.	Local press, news features, TV or online media outlets.

3. Permissions

As part of the initial agreement to participate in GRIT services, written permission will be sought for images of service users to be used for promotional, fundraising, and documentary purposes.

- **Consent form**
 - A contributor release form must be signed and dated.
 - The form should specify which categories of image use (internal, publicity/promotional, external media) are agreed.
 - Full contact details of the person in the image (or their parent/guardian) must be included.
- **Children and young people**
 - Where the person in the image is under 18, the consent form must be signed by a parent or legal guardian.
 - Children and young people will always be consulted about the use of their image, and their views respected.
 - Where a young person is 16–17 and living independently with no appropriate adult, they may sign their own consent form.
 - If a young person (aged 13 or over) lacks capacity to consent, their parent/carer with parental responsibility must sign on their behalf.
- **Opt-out option**
 - Consent is obtained as part of the GRIT participation agreement.
 - If consent is withheld, participants (or their parent/guardian) must complete a withholding or withdrawal of consent form.
 - This will be recorded and securely retained by the GRIT committee.
 - Withholding consent will not affect participation in GRIT activities, except where recording is essential to the activity.

▪ **Review and withdrawal**

- Consent can be reviewed or withdrawn at any time by contacting GRIT in writing.
- GRIT will make all reasonable efforts to remove images from future use, noting that complete withdrawal may not be possible for materials already published (e.g., printed leaflets, press articles).

4. Storing images securely

GRIT is committed to ensuring that all photographs and video recordings are stored and managed safely in line with our safeguarding responsibilities and data protection legislation.

Do's

- Store all images in secure, password-protected GRIT systems approved for this purpose.
- Restrict access to authorised staff or committee members only.
- Keep printed photographs in a **locked drawer or cabinet**.
- Regularly review stored images and delete those no longer required.
- Retain images for no longer than **3 years after the young person leaves GRIT services**, unless renewed consent is obtained.
- Delete images from mobile phones or cameras once they have been transferred to secure storage.

Don'ts

- Don't store images on personal cloud accounts (e.g., iCloud, Google Photos, Dropbox).
- Don't use unencrypted USB sticks, memory cards, or CDs for long-term storage.
- Don't share images externally unless the appropriate consent has been given.
- Don't use images outside the scope of the original consent unless further consent is obtained.

Public Display

- Printed images may be displayed at GRIT events or fundraising activities where consent has been granted. These should be archived or securely destroyed once no longer in use.

External Media

- Images required for press release, publication, or broadcast may only be shared where specific consent has been obtained.

5. Guidelines for commissioning & using images

When commissioning or using photographs and video recordings, GRIT will ensure the following safeguards are in place:

External photographers/filmmakers

- Must be subject to GRIT's usual safeguarding checks and procedures before being engaged.
- Should be briefed on this policy and required to always follow GRIT'S safeguarding standards.

Children's identities

- Children's **real names must not be used** in captions or published material.
- Where anonymity is required, pseudonyms may be used, and this must be noted in the publication or record.
- GRIT will avoid including identifying details (e.g., school, location, contact details) alongside images.

Appropriateness of images

- Children and young people must be suitably and appropriately clothed to minimise the risk of inappropriate use.
- Extra care should be taken for activities involving costumes or swimwear, with image selection/editing used to protect dignity.
- Images must never be altered in a way that misrepresents the individual or activity.

Personal use by families

- Service users and their parents may take photographs for **personal use only**.
- They should be discouraged from posting images on social media if other service users appear in the background, unless those families have also given consent.

6. The Legal Position

It is not illegal for GRIT staff, volunteers, or contractors to take photographs or video recordings of children, young people, staff, or volunteers during GRIT activities. However, such images may be considered **personal data** under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

This means that:

- Images must be processed lawfully, fairly, and transparently.
- Consent must be obtained (or not withheld) before images are used for publicity, fundraising, or external purposes.
- Images must be collected only for specified purposes, stored securely, and retained no longer than necessary.
- Individuals have the right to withdraw consent at any time, and GRIT must respect this wherever reasonably possible.

GRIT will not publish or display images where consent has been withheld or withdrawn, and will, wherever possible, avoid naming individual children in publicity materials or media outputs.

If you are a member of the public, or a service user and wish to raise concerns about our conduct please contact us in the first instance. Or please visit the [Charity Commission website](#).

7. Complaints and Concerns

If you are a service user, parent, carer, or member of the public and have concerns about GRIT's use of photographs or video recordings, please contact us directly in the first instance.

If your concern is not resolved to your satisfaction, you may raise a complaint with:

- **The Charity Commission** – regarding GRIT's governance and use of charitable resources.
- **The Information Commissioner's Office (ICO)** – regarding data protection or misuse of personal data.

GRIT is committed to responding promptly, fairly, and transparently to any concerns raised.

8. Governance and Review

- This policy is approved by the GRIT Trustees and forms part of the organisation's safeguarding framework.
- Responsibility for implementation rests with GRIT staff, volunteers, and contractors, who must follow the procedures outlined.
- The policy will be reviewed **every 3 years**, or sooner if legislation, statutory guidance, or organisational practice changes.
- The Chair of Trustees will ensure that reviews are completed and recorded.

 ▪ Updated by James O'Mara (Finance and Operations Manager 9/4/25)

▪ Approved by Dr Louise Randall, Chairman

Signature:

Date:

Dr Louise Randall

26/09/2025

▪ Next review date: 1/4/28