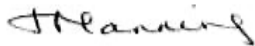




Photography and Filming Policy

Policy Ref: TMP79v4

This policy will not discriminate either directly or indirectly against any individual on grounds of sex, race, ethnicity or national origin, gender, sexual orientation, marital status, religion or belief, age, disability, socioeconomic status, offending background or any other personal characteristic.

	Name	Title	Signature	Date
Prepared by	Jackie Manning	Principal		July 2026
	Colin Foster	Assistant Principal		July 2026
Approved by	Martin Heaton	CEO		July 2026

Does this Policy require publishing on the College Website? **Yes**

Does this Policy require approval by Board of Governors? **Yes**



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Record of Changes

Version	Issue Date	Changes	Initials
v1	Apr 2024	Initial issue	JM/CF
v2	July 2024	Annual review, references checked and updated	JM/CF
v3	July 2025	Annual review, references checked and updated	JM/CF
v4	July 2026	Annual review. Updated safeguarding, data protection, consent, personal devices, learner-created media, AI/image manipulation, consent form and ref to CCTV policy	KP/JM

Board of Governors Approval History

Version	Approved by	Signature	Date
v1	Claire Bolt, Board of Governors		May 2026

Date of Next Policy Review: July 2027

Definition

Throughout this policy document **TMP Studios CIC** is referred to as 'TMP College'.

Scope and Purpose

This policy applies to all learners, staff, volunteers, contractors, visitors, external professionals and other adults associated with TMP College. It covers photography, filming, learner-created visual media and the College's use of CCTV/security cameras in internal and external areas of College premises. It reflects the safeguarding and data protection needs of the College community and aligns with the College's safeguarding, data protection, staff conduct and visitor arrangements.

The capture of images and videos of our learners is an integral part to many aspects of our core services as an education provider. These include:

- Images and videos of performances from learners on our Music and Performing Arts courses, used for evidence and assessment purposes,
- The production of film/ media/ music videos/ showreels by the learners as part of their coursework, which may contain images of our learners,
- Visual media gathered and used for publicity purposes (e.g. notice boards, website, social media, advertisements etc)

The purpose of this policy statement is to:

- protect children, young people and adults at risk who take part in TMP College's services, events and activities, specifically those where photographs and videos may be taken.
- set out the overarching principles that guide our approach to photographs/videos being taken of children, young people and adults at risk during our events and activities.
- to ensure that we operate in line with our values and within the law when creating, using and sharing images of children, young people and adults at risk.

Legal framework

This policy is informed by the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, Data (Use and Access) Act 2025, safeguarding legislation and current Department for Education and Information Commissioner guidance on the safe and lawful use of photographs and videos in education.

Safeguarding concerns arising from photography, filming or image sharing must be managed in accordance with the TMP College Safeguarding and Child Protection Policy and Safeguarding Operational Handbook. Data protection matters must be managed in accordance with the College's Data Protection Policy, privacy notices and retention arrangements.

Policy Statement

We believe that:

- children, young people and adults at risk should never experience abuse of any kind
- we have a responsibility to promote the welfare of all children, young people and adults at risk and to take, share and use images of children safely.

We recognise that:

- sharing photographs and films of our activities can help us celebrate the successes and achievements of our children, young people and adults at risk, provide a record of our activities and raise awareness of our organisation
- the welfare of the children, young people and adults at risk taking part in our activities is paramount
- children, young people and adults at risk have a right to decide whether their images are taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation
- learners and, where appropriate, parents/carers should be given clear information about why images are being taken, how they will be used, stored and shared, and the potential risks of wider publication. Where consent is relied upon as the lawful basis, it must be freely given, specific, informed and unambiguous and may be withdrawn.
- there are potential risks associated with sharing images of children, young people and adults at risk online.

We will seek to keep children, young people and adults at risk safe by:

- identifying an appropriate lawful basis for each use of identifiable images and obtaining consent or permission where required. For publicity, marketing and public social media use, the College will normally seek clear, recorded permission and provide an accessible way to opt out or withdraw consent where consent is the lawful basis.
- always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images
- making it clear how consent or permission can be withdrawn or changed. The College will stop future use where required and will make reasonable efforts to remove images from College-controlled channels, while explaining that material already printed, published or copied by others may not always be recoverable.
- changing the names of children, young people and adults at risk whose images are being used in our published material whenever possible (and only using first names if we do need to identify them)
- making sure children, young people and adults at risk and their parents or carers (if appropriate) understand how images will be securely stored and for how long (including how we will control access to the images and their associated information)
- reducing the risk of images being copied and used inappropriately by:
 - only using images of children, young people and adults at risk in appropriate clothing (including safety wear if necessary)

- avoiding full face and body shots of children, young people and adults at risk and their parents or carers (if appropriate) taking part in activities such as swimming where there may be a heightened risk of images being misused
- using images that positively reflect young people's involvement in the activity.

We will also develop a procedure for reporting the abuse or misuse of images of children as part of our child protection procedures. We will ensure everyone involved in our organisation knows the procedures to follow to keep children safe.

Photography and/or Filming for Personal Use

When children, young people and adults at risk themselves, parents, carers or spectators are taking photographs or filming at our events and the images are for personal use, we will publish guidance about image sharing in the event programmes and/or announce details of our photography policy before the start of the event.

This includes:

- reminding children, young people and adults at risk and their parents or carers (if appropriate) that they need to give consent for TMP College to take and use their images
- asking attendees to respect the privacy and safeguarding of others and not to publish identifiable images of other learners on public social media or wider online platforms without appropriate permission
- recommending that people check the privacy settings of their social media account to understand who else will be able to view any images they share
- reminding children, young people and adults at risk and their parents or carers (if appropriate) who they can talk to if they have any concerns about images being shared.

Photography and/or Filming for TMP College's Use

We recognise that staff and learners may use photography and filming as part of authorised curriculum, assessment, performance and enrichment activity. This must be undertaken for a clear College purpose, with appropriate supervision, using College-approved equipment, systems and platforms and in line with recorded permissions and the relevant lawful basis.

Learners and, where appropriate, parents/carers will be informed where photography or filming forms part of a programme or activity, how the material will be used and whether it will remain internal or may be published externally. Separate permission will be obtained where a new or materially different use is proposed and consent is the lawful basis.

If we hire a photographer for one of our events, we will seek to keep children, young people and adults at risk safe by:

- providing the photographer with a clear brief about appropriate content and behaviour
- ensuring the photographer wears identification at all times

- informing children, young people and adults at risk and their parents or carers (if appropriate) that a photographer will be at the event and ensuring they give written consent to images which feature their child being taken and shared
- not allowing the photographer to have unsupervised access to children, young people and adults at risk
- not allowing the photographer to carry out sessions outside the event or at the home of children, young people and adults at risk
- reporting concerns regarding inappropriate or intrusive photography following our Safeguarding and child protection procedures.

Safeguarding Images

Photographs required specifically for safeguarding purposes, including visible injuries, must only be taken where necessary, proportionate and appropriate and in accordance with safeguarding procedures. The Databridge Body Map should normally be used to record visible injuries. A photograph should only be taken where there is a clear safeguarding purpose and following advice from the DSL/safeguarding team. Safeguarding images must be stored securely within the appropriate safeguarding record and must not be stored with publicity images or learner coursework. Personal devices must not be used to take safeguarding photographs.

Artificial Intelligence and Image Manipulation

Photographs, videos or recordings of learners must not be uploaded to unapproved generative AI services or used to create synthetic, manipulated or misleading content. Creating or sharing deepfakes, sexualised images, impersonations or other harmful manipulated images of a learner will be treated as a safeguarding concern and managed in accordance with the Safeguarding and Child Protection Policy. New AI or digital platforms involving learner images must be subject to appropriate data protection and safeguarding checks before use.

Learner-Created Content

Learners may photograph or film other learners as part of authorised curriculum activity where this is appropriate, supervised and consistent with College permissions. Learners must not publish, share, download or transfer identifiable images or recordings of another learner outside the authorised activity without permission. Staff must make clear the difference between permission to participate in curriculum filming and permission for material to be published publicly or shared on social media. College expectations relating to online safety, acceptable use, harassment, sexual imagery and safeguarding apply to all learner-created media.

Photography and/or filming for wider use

If people such as local journalists, professional photographers (not hired by TMP College) or students wish to record one of our events and share the images professionally or in the wider world, they should seek permission in advance.

They should provide:

- the name and address of the person using the camera
- the names of children, young people and adults at risk they wish to take images of (if possible)
- the reason for taking the images and/or what the images will be used for
- a signed declaration that the information provided is valid and that the images will only be used for the reasons given.

TMP College will verify these details and decide whether to grant permission for photographs/films to be taken. We will seek consent from the children, young people and adults at risk and their parents or carers (if appropriate) who are the intended subjects of the images and their parents and inform the photographer of anyone who does not give consent.

At the event we will inform children, young people and adults at risk and their parents or carers (if appropriate) that an external photographer is present and ensure the photographer is easily identifiable, for example by issuing them with a relevant visitors lanyard.

If TMP College is concerned that someone unknown to us is using their sessions for photography or filming purposes, we will ask them to leave and (depending on the nature of the concerns) follow our child protection procedures.

If Consent to take Photographs is not given

If children, young people and adults at risk and their parents or carers (if appropriate) do not consent to photographs being taken, we will respect their wishes. We will agree in advance how they would like to be identified so the photographer knows not to take pictures of them, and ensure this is done in a way that does not single out the children, young people or adults at risk or make them feel isolated.

We will never exclude a child, young person or adult at risk from an activity because we do not have consent to take their photograph.

Storing Images

Photographs and videos will be stored securely in accordance with the College's Data Protection Policy, privacy notices, retention schedule and safeguarding arrangements. Access will be limited to those who require it for an authorised purpose, and images will be deleted or disposed of securely when no longer required.

Electronic images and recordings must be stored on College-approved secure systems. They must not be stored on personal cloud accounts, personal messaging applications, personal social-media accounts or unapproved portable media. Where removable College-approved media is exceptionally required, it must be encrypted and managed in accordance with College data-protection arrangements.

Personal Devices

- Staff must not use personal mobile phones, cameras, tablets or other personally owned devices to photograph or film learners for College purposes. Photography and filming must be undertaken using College-approved equipment, devices, systems or platforms.
- Any exceptional operational requirement must be authorised in advance by an appropriate senior manager and the Data Protection Lead/DPO where relevant, with the safeguarding and data-protection risks documented and appropriate controls agreed.
- Images and recordings must not be transferred to personal accounts, personal cloud storage, messaging applications or personal social-media accounts. Any accidental capture or storage on an unauthorised device must be reported immediately in accordance with College data-protection and safeguarding procedures.
- Staff and learners must follow College instructions for secure transfer, retention and deletion of authorised images and recordings.

Audio recording will not normally be enabled. Any proposed use of audio recording, facial recognition, biometric identification or other enhanced surveillance capability would require separate assessment, clear justification and appropriate data protection and safeguarding approval before use.

TMP College operates CCTV/security and body worn cameras in appropriate internal and external areas of College premises. The purpose of CCTV and body worn cameras is to support the safety and security of learners, staff and visitors, protect College premises and property, support safeguarding arrangements, and assist in the prevention, review and investigation of incidents where appropriate.

Full details can be found in TMP College's policy **TMP90 CCTV and Body Worn Camera Policy**.

Consent Forms

All learners are required to complete an image consent form at enrolment. The form for academic year 2026/27 is given in the following page.

Consent form for use of images

(photographs, videos, and digital images)

We use images of students as part of college displays and newsletters, on the college's website, on social media and for publicity purposes in printed publications, such as newspapers.

From time to time, TMP College may be visited by local media and press, who take images of college events. Students may appear in these images, and these may be published in local or national newspapers, or on approved websites. Where any organisations other than those above intend to use images of you, additional consent will be sought before any image is used.

To comply with the General Data Protection Regulations (GDPR) we need your consent to take images and use them in the ways described above. Please tick either Yes or No

	Yes	No
I give permission for my image to be used on TMP College's website		
I give permission for my image to be used on TMP College's social media pages, e.g. Twitter, Facebook		
I give permission for my image to be used in marketing materials, e.g. College brochures, prospectus, banners, newsletters, presentations, films		
I give permission for my image to be used in the local newspaper		
I give permission for my image to be used in national newspapers		
I give permission for my image to be used within College for display purposes that might be seen by visitors		

This form is valid from the date of signing until you leave college. Photographs and videos used for publicity purposes may continue to remain in circulation after you have left the College. You have the right to withdraw your consent at any time but it may not be possible to remove images that are already in circulation or have already been published although every effort will be made to do so. If you would like to withdraw your consent, you must submit your request in writing to the Principal.

Please also note that CCTV and Body Worn Cameras (BWC) are used throughout TMP College's different campuses which constantly record images and audio. Images and audio from CCTV and BWCs may be shared with the emergency services and our partners in connection with investigations into safeguarding incidents or potential criminal activity.

Signed: _____ Name: _____ Date _____