



EDVENTURES | POLICY SUITE

Photography and Image Consent Procedure

Document reference	EDV-POL-012
Legal entity	EJFVENTURES LTD (company number 16938508), trading as Edventures
Version	1.0 — harmonised edition
Policy owner	Edward Fairnington, Owner and Responsible Manager
Approved by	Edward Fairnington
Approval date	16 October 2026
Effective date	16 October 2026
Next scheduled review	16 October 2027
Review frequency	Annually, or earlier following significant change or incident
Approval signature	_____

1. Purpose

Edventures recognises the importance of protecting the privacy, dignity, wellbeing and safety of all participants when photographs, videos and other visual recordings are taken, stored, used or shared.

This procedure establishes arrangements for obtaining photography permissions, managing personal information, safeguarding participants and ensuring images are used appropriately.

Photographs and videos may be used to celebrate achievements, demonstrate activities, provide information about services and promote Edventures programmes.

Photography and filming for promotional purposes are optional and must never be a condition of participation.

2. Scope

This procedure applies to:

- All Edventures activities, including climbing clubs, outdoor adventures and wellbeing experiences.
- Children, young people and adult participants.
- Employees, freelance instructors, contractors, volunteers and others authorised to photograph on behalf of Edventures.

- Photographs, videos, audio-visual recordings and digital images captured or processed for Edventures purposes.
- Images used on the Edventures website, social media, printed publications, promotional materials and approved third-party platforms.

When activities take place in hired schools, climbing centres or other venues, Edventures will comply with relevant venue photography restrictions in addition to this procedure.

Edventures is responsible for administering permissions for its own participants and does not assume that permission given to a venue also authorises Edventures to use photographs.

3. Responsibilities

Policy Owner and Privacy Lead

Edward Fairnington is responsible for:

- Maintaining this procedure and associated consent records.
- Approving photography and image publication.
- Ensuring consent preferences are accessible to authorised personnel.
- Managing withdrawal and image removal requests.
- Overseeing the secure storage, retention and deletion of images.
- Reviewing privacy and safeguarding incidents involving photographs or videos.

Instructors, Contractors and Volunteers

All individuals working on behalf of Edventures must:

- Follow this procedure and venue-specific restrictions.
- Check photography permissions before taking images.
- Respect participants who do not wish to be photographed.
- Use only approved equipment and storage arrangements.
- Never publish participant images through personal social media accounts.
- Report unauthorised photography or inappropriate image sharing promptly.

Photography briefings form part of operational communication and do not constitute instructor qualification or technical activity training.

4. Consent and Lawful Basis

Edventures will identify and document an appropriate UK GDPR lawful basis before processing identifiable photographs or videos.

For optional promotional photography, Edventures will normally rely on freely given, specific, informed and withdrawable consent.

Permission will be collected separately from the general activity booking agreement.

Participants, or their parents or carers where appropriate, will be able to choose whether images may be:

1. Captured by Edventures.
2. Used internally for authorised activity-related purposes.
3. Published on the Edventures website.
4. Shared on official Edventures social media accounts.
5. Used in printed promotional materials.
6. Shared with named external organisations, publications or partners for specified purposes.

Consent will not be assumed from participation, silence, pre-ticked boxes or consent given to another organisation.

Children and Young People

- For participants under 16, Edventures will seek permission from a person with parental responsibility and will also consult the child.
- For participants aged 16–17, Edventures will consider the young person's understanding and ability to consent independently, taking account of safeguarding circumstances and whether parental involvement is appropriate.
- A young person's refusal to be photographed will be respected regardless of an adult's permission.
- Where parental responsibility or authority is uncertain, photography will not take place until the appropriate permission has been established.

Adults

Adult participants will make their own informed decisions regarding optional photography and publication.

Consent will not be included as a compulsory requirement for booking or taking part in an activity.

Other Photography Purposes

Photography required for a separately identified operational, safety or incident-management purpose will be assessed under its own lawful basis and documented in the Edventures data map. It will not automatically be covered by promotional consent.

5. Collecting and Recording Permissions

Photography preferences will be collected through the Edventures Photography and Image Consent Form or an equivalent section within the booking system.

The record will include:

- Participant identification.
- Parent or carer details where applicable.
- Confirmation of authority to give permission.

- Separate permissions for capture and different uses.
- Date and method of consent.
- Any restrictions requested.
- Subsequent changes or withdrawal.

Photographic permissions must be available to the activity leader before photography takes place.

Where permission is missing, unclear or out of date, the participant must be treated as not having given permission.

Permissions will be reviewed when a participant joins a new programme or when the intended use of images changes materially. For ongoing clubs, Edventures will seek refreshed permissions at least annually as an internal practice.

6. Photography During Activities

Before photography takes place, the activity leader must:

- Confirm permissions and restrictions.
- Check any venue rules.
- Identify who is authorised to take photographs.
- Consider any safeguarding or privacy risks.
- Inform participants that photography will take place.

Photography must not interfere with the safe supervision or delivery of an activity.

Instructors must not compromise their responsibilities for participant safety in order to capture photographs or videos.

Where practical, images should focus on the activity, environment or achievement rather than identifying individual children.

Participants without photography permission must not be deliberately included in photographs, videos or identifiable background footage.

Edventures will avoid photography in changing facilities, toilets, private areas and other locations where participants reasonably expect privacy.

7. Safeguarding and Appropriate Images

All images must be respectful, age-appropriate and consistent with the Edventures Safeguarding Policy.

The following requirements apply:

- Children must not be photographed in ways that could cause embarrassment, distress or humiliation.
- Images must not be used in a misleading or inappropriate context.

- Children's full names must not normally accompany published images.
- Personal information, school details, contact information and precise participant locations must not be unnecessarily disclosed.
- Images must not reveal confidential medical, safeguarding or family circumstances.
- Photographs must show appropriate clothing and safety equipment.
- Images must not be taken or shared where doing so could place a participant at risk.
- Live location information or identifiable real-time attendance information about children must not be published.

Extra care must be taken where a participant is subject to safeguarding restrictions or where sharing an image could expose their location or identity.

Where an image presents an identifiable risk, it must not be published even where general consent has been obtained.

8. Approved Devices and Photography Arrangements

Photography on behalf of Edventures may only be undertaken by authorised individuals using approved devices.

The preferred arrangement is an Edventures-controlled device or a dedicated organisational camera.

Personal devices must not be used to photograph children for Edventures purposes unless expressly authorised in advance under a documented arrangement providing equivalent security controls.

Photographs must not be stored in personal cloud accounts, personal photo libraries or personal messaging applications.

Automatic personal cloud backup and location tagging must be disabled on devices used for authorised photography.

Images must be transferred promptly to approved Edventures storage and deleted securely from capture devices once transfer has been confirmed, subject to any required incident-preservation arrangements.

9. Secure Storage and Access

Edventures will store images in an access-controlled organisational storage system.

Access will be limited to individuals with a legitimate operational reason to use the images.

The following safeguards will apply:

- Strong passwords and multifactor authentication.
- Restricted sharing permissions.
- Approved and secured devices.
- Separation of consent records from publicly accessible image folders.
- No unrestricted public access to original image libraries.

- Secure deletion when images are no longer required.
- Review of external storage providers and relevant contractual and international transfer arrangements.

The approved storage system and access permissions will be recorded in the Edventures data map and operational records.

10. Publication and External Sharing

Before publishing an identifiable image, the person responsible must:

1. Confirm that the relevant permission is current.
2. Confirm that the intended publication is covered by the permission.
3. Check the image for safeguarding and privacy concerns.
4. Remove unnecessary identifying information and embedded location metadata where practicable.
5. Ensure publication is appropriate and consistent with Edventures' values.
6. Obtain approval from the Policy Owner or an authorised delegate.

Publication may take place through approved Edventures communication channels.

Images must not be passed to third parties for their own promotional use without suitable prior permission and an appropriate data-sharing arrangement where required.

Separate permission will be sought for any materially different use, including a new external publicity campaign not covered by the original permission.

Edventures will not use identifiable participant images to generate AI-created promotional material or upload them to external AI editing services without a specific assessment, suitable information to participants and any additional permissions required.

11. Parents, Carers and Spectators

Parents, carers and spectators may wish to take photographs during activities.

Any photography must comply with venue rules and directions from Edventures staff.

Edventures will ask parents and spectators not to publish or distribute images containing identifiable children other than their own without appropriate permission.

Where safeguarding risks or venue requirements make photography inappropriate, Edventures may restrict or prohibit spectator photography.

Parents and carers must not photograph participants in changing facilities or other private areas.

Staff should intervene and escalate concerns where photography creates a safeguarding or privacy risk.

12. Withdrawal of Consent and Image Removal

Participants, or those authorised to act on their behalf, may withdraw consent at any time by contacting:

info@ed-ventures.co.uk

Edventures will:

- Record the withdrawal.
- Update the participant's photography preferences promptly.
- Stop further photography and use based on the withdrawn consent.
- Remove affected images from Edventures-controlled websites, social media accounts and promotional systems as soon as reasonably practicable.
- Remove or restrict stored images unless a separate lawful reason justifies retention.
- Consider requests relating to external recipients and notify them where required.
- Confirm the action taken to the requester.

Withdrawal does not make earlier lawful processing unlawful.

Images already printed, downloaded, copied or shared by third parties may not be fully recoverable. Edventures will explain these limitations clearly and take reasonable steps to prevent further use under its control.

13. Image Retention and Deletion

Edventures will apply the following operational retention periods, subject to confirmation in the organisation's retention schedule:

- Unselected photographs and videos: delete within 90 days of capture.
- Selected images with valid promotional consent: retain for up to 24 months from capture, unless refreshed permission and a documented continuing purpose justify further retention.
- Published promotional images: review at least annually and remove when no longer required, consent is withdrawn or the image becomes inappropriate.
- Consent records: retain while the associated permission remains relevant and for an appropriate documented period afterwards to demonstrate compliance.
- Images relating to safeguarding concerns, complaints or incidents: retain separately in accordance with the relevant safeguarding or incident records retention schedule.

Images must not be retained indefinitely simply because consent was originally provided.

14. Breaches, Concerns and Complaints

Any suspected inappropriate photography, unauthorised image publication, loss of images or security breach must be reported promptly to the Policy Owner and, where relevant, the Designated Safeguarding Lead.

Edventures will:

- Take immediate steps to contain the incident.
- Assess risks to affected individuals.
- Record the incident and actions taken.
- Follow safeguarding escalation procedures where appropriate.
- Assess whether notification to the ICO or affected individuals is legally required.
- Review the incident and implement improvements.

Serious safeguarding concerns must be referred to the appropriate statutory agencies without delay.

15. Related Policies and Documents

This procedure must be read alongside:

- Edventures Safeguarding and Child Protection Policy.
- Edventures Privacy Policy.
- Edventures Data Retention Schedule.
- Edventures Data Map / Record of Processing Activities.
- Edventures Online Safety and Digital Communications arrangements.
- Edventures Complaints and Concerns Procedure.
- Edventures Photography and Image Consent Form.
- Applicable venue hire agreements and site-specific restrictions.

16. Monitoring and Review

The Policy Owner will review this procedure at least annually and following:

- A relevant change in legislation or official guidance.
- A significant privacy or safeguarding incident.
- Changes to the organisation's photography practices.
- Introduction of new photography, storage or publication technology.
- Changes to programme delivery or venue arrangements.

Approved by: Edward Fairnington

Signature: _____

Date: _____

Next scheduled review: October 2027

Controlled supporting-document cross-reference (2026 consolidation)

Authoritative participant promotional photography consent: EDV-FRM-PHO-01; supersedes EDV-FRM-OS-02.

This note identifies the current supporting document without altering the substantive policy duties or replacing required operational approvals.