Hereward College
PROMOTING INDIVIDUAL ACHIEVEMENT

Guidance and Procedure for Photographing and Filming Young People

SLT Member responsible for Policy	Deputy Principal
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Contents

Context 1
Risks of Taking and Using Imagery 1
Procedure for Consent 3
If Consent to Take Photographs is Not Given 6
Storing Images 6
Related Policies and Procedures 7
Appendix 1 – Student Photo Consent Form 7
Student Photo Consent Form 9
Appendix 2 – Permission to Use Imagery of a Hereward Student 10
Initial Equality Impact Assessment Screening 11

Context

Hereward College works with young people, employers and families as part of its educational and work-based activities. These activities may include, live performances and productions, exhibitions and photography, marketing activities using social media and other public platforms for exposure. In addition, we work with employers as part of our work-based activities who may in turn advertise or promote young people through their own platforms. In addition, staff may use College devices to take photographs for the purpose of providing evidence to support targets and to document learners' progress and achievement.

Recent developments in Artificial Intelligence (AI) technologies have increased the potential for photographs, videos and audio recordings of young people to be copied, manipulated, altered, or used to create synthetic content such as deepfakes. Whilst these technologies can support education, creativity and communication, they may also present safeguarding, privacy, reputational and emotional wellbeing risks for young people. Hereward College recognises these emerging risks and is committed to ensuring that all photography, filming and use of imagery involving learners is undertaken in a manner that protects their safety, dignity, privacy and rights.

The purpose of this procedure is to:

- protect young people who take part in Hereward College 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 young people 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 young people.
- to ensure that emerging technologies, including Artificial Intelligence (AI), are considered when assessing and managing risks associated with the taking, storage, sharing and publication of learner imagery.

This procedure applies to all staff, volunteers and employers and any other associated company or group working with or on behalf of Hereward College.

We have a responsibility to promote the welfare of all young people and to take, share and use images of young people safely.

Risks of Taking and Using Imagery

It's important that young people feel happy with their achievements and have photographs and films of their special moments, for private use. Family/friends or employers also want to be able to share the successes of young people when they have been part of a special event or activity.

However, some young people, parents or carers may not be comfortable with images being shared. For example:

- if a young person and/or their family have experienced abuse they may worry about the perpetrator tracing them online.
- young people who choose not to have contact with some members of their family may decide to minimise their online presence.
- families may have religious or cultural reasons for choosing not to be photographed.

It's important to be aware of child protection and safeguarding issues when taking photos of or filming young people. The potential for misuse of images can be reduced if staff are aware of the potential dangers and put appropriate measures in place.

Sharing of photographs and images of young people on social media or other online platforms carry potential risks. For example:

- Young people may become vulnerable to grooming if a photograph is shared alongside information that makes them identifiable. This includes: personal details; a tag with location information; visual details such as a uniform or place of study or work.
- images may be copied, downloaded, screenshotted or shared by anyone.
- images may be copied, altered, manipulated or combined with artificial intelligence technologies to create synthetic, misleading or harmful content, including deepfake images, videos or audio recordings.
- photos or videos may appear in internet search results or may be 'web-scraped'.
- depending on the terms and conditions of using an online platform, the image may be owned by the platform once it's been posted. Platforms may then license images for use by third parties – such as for commercial purposes.
- each photo or video, and any comments on them, become a part of the young person's public image. This may affect them later in life – for example, it may affect how they see themselves, or how they are viewed when applying for a job.
- AI-powered applications may be used to create sexualised, indecent or otherwise harmful images from genuine photographs of learners without their knowledge or consent.
- Individuals and educational organisations could be subject to blackmail to prevent the sharing of these images.

To reduce the risk of images being copied and used inappropriately:

- only use images of young people in appropriate clothing (including safety wear if necessary) and never taking images including full face and body shots and completely avoiding photographs of activities where there may be a heightened risk of images being misused.
- use images that positively reflect young people's involvement in the activity.

- use images that are taken from over the shoulder, or from a distance, making the identification of individuals difficult, for those who may wish to alter, manipulate or combine with AI technologies to create harmful content.

Procedure for Consent

- Always ask for written consent from a young person and/or their parents or carers before taking and using a young person's image. (Appendix 1 Student Photo Consent form).

- As part of the consent process, learners and parents/carers will be informed that images, videos and audio recordings shared online may be copied, downloaded, manipulated, altered or repurposed using Artificial Intelligence technologies by individuals or organisations outside the control of the College.

- Whilst Hereward College will take all reasonable steps to minimise risk, the College cannot guarantee that imagery placed in the public domain will not be subject to misuse through AI-enabled technologies.

- Make it clear that if a young person or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published**.**
- To withdraw consent, email student.services@hereward.ac.uk so that centrally held records can be updated.
- The list of students with consent who are to be featured in any film or photography must be sent to the safeguarding team to ensure that any additional safeguarding concerns can be identified prior to commencing with the photography and /or filming. The safeguarding review should consider any increased vulnerability to online exploitation, image-based abuse, stalking, harassment, honour-based abuse, domestic abuse, contextual safeguarding concerns, or potential misuse of imagery through Artificial Intelligence technologies.

- Should any safeguarding concerns arise for the young person or from the knowledge of any wider family issues, then consent may be over ruled.
- Where consent is over ruled, the safeguarding team will work with staff and family to discuss the decision.

Photography and/or filming for Hereward College use

We recognise that our staff may use photography and filming as an aid in activities such as music or drama or for marketing purposes.

In these instances;

- Photographs must only be taken using College equipment.

- The young person should have a signed consent form to have their photograph taken.
- The list of students who were to be featured in the film or photography must be sent to the safeguarding team to ensure that any additional safeguarding concerns can be identified prior to commencing with the photography and /or filming.

If the College hires a photographer/videographer for one of our events, the College will seek to keep young people safe by:

- providing the photographer/ videographer with a clear brief about appropriate content and behaviour.
- ensuring the photographer/ videographer wears identification at all times.
- informing young people, their parents and carers that a photographer/ videographer will be at the event and ensuring they give written consent to images (which feature their young person) being taken and shared.
- not allowing the photographer/ videographer to have unsupervised access to young people.
- not allowing the photographer/ videographer to carry out sessions outside the event with students.
- reporting concerns regarding inappropriate or intrusive photography following our safeguarding procedures.

Artificial Intelligence and Learner Imagery

Staff must not:

- Upload learner photographs, video footage or audio recordings into publicly available AI platforms or social media.
- Use unapproved AI applications to alter, enhance, edit, recreate or generate images of learners.
- Share learner imagery with AI systems for training, testing or development purposes.
- Use AI-generated versions of learner images for publicity, marketing or educational purposes without explicit organisational approval.

Any proposed use of AI technologies involving learner imagery must be approved by the Designated Safeguarding Lead and Data Protection Officer.

For the publication of an image and or film Hereward College will;

- change the names of young people whose images are being used in our published material whenever possible (and only using first names if we do need to identify them).

- never publish personal information about an individual young person and disguising any identifying information (for example the name of the College or a uniform with a logo or workplace).
- making sure young people, their parents and carers understand how images of young people will be securely stored and for how long (including how we will control access to the images and their associated information).
- Ensure young people, their parents and carers are aware of the risks associated with illicit digital manipulation of images using AI.

Photography and/or filming for wider use

If people such as journalists, work-based employers, professional photographers (not hired by Hereward 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 via the permission to use imagery of a Hereward students form (appendix 2)

- the name and address of the person/company using the imagery
- the names of young people they wish to take images of
- the reason for taking the images and/or what the images or material will be used for
- How imagery will be stored and for how long
- a signed declaration that the information provided is valid and that the images will only be used for the reasons given.

Hereward College will verify these details and decide whether to grant permission for photographs/film/articles to be taken and published. We will seek consent from the young people who are the intended subjects of the images and their parents where appropriate and inform the 3rd party of anyone who does not give consent.

External organisations must confirm that learner images, videos and recordings will not be used for the development, training or testing of Artificial Intelligence systems without separate explicit consent and written approval from Hereward College.

Work-based activities

Occasionally in the role as an intern Hereward student will have the opportunity to feature in or be a part of marketing materials, in these instances the material that they create must comply with this policy and;

- Complete a 'permission to use imagery of a Hereward student' form with the 3rd party
- Complete a consent form with the young person and their family/carer, ensuring that they are aware of where the information will be published and making them aware of the risk associated with the published materials, including risks associated with AI and digital manipulation.

- Check with the safeguarding team that there are no safeguarding concerns regarding the learner and their family.
- Review the material before it is published to ensure that it is suitable.

If Consent to Take Photographs is Not Given

If young people, parents and/or carers 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 or make them feel isolated. We will never exclude a young person from an activity because we do not have consent to take their photograph. Notify student.services@hereward.ac.uk that centrally held records can be updated.

Annual updates of consent

Each academic year Student Services will send out the Student Consent Form (Appendix 1) to all learners prior to starting the academic year.

Storing Images

We will store photographs and videos of young people securely, in accordance with our safeguarding policy and data protection law.

We will keep hard copies of images in a locked drawer and electronic images in a protected folder with restricted access.

We will never store images of young people on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

Staff must ensure that College imagery is stored only within approved College systems and must not be uploaded to external AI applications or cloud services that have not been approved through College information governance procedures.

Hereward College does not permit staff, volunteers and third parties to using any personal equipment to take photos and recordings of young people. Only cameras or devices belonging to the College or organisation should be used.

Artificial Intelligence, Deepfakes and Image-Based Abuse

The College recognises that deepfake technology, synthetic media, AI-generated imagery and AI-generated audio may be used as a means of bullying, harassment, exploitation, coercion, impersonation or image-based abuse.
Any concern that a learner's image, likeness or voice has been manipulated, generated or shared using Artificial Intelligence technologies will be treated as a safeguarding concern and reported immediately to the Designated Safeguarding Lead.
The College will consider referrals to the Police, Social Care, CEOP and other safeguarding agencies where appropriate.

Related Policies and Procedures

- Young People and Adults at Risk Safeguarding policy
- Digital Safety and Security Policy and Procedures
- https://learning.nspcc.org.uk/research-resources/briefings/photography-sharing-images-guidance#heading-top

Appendix 1 – Student Photo Consent Form

Consent Form for the use of Personal Data and Photography/film and audio content (For all students **under** 18 a parent/guardian must complete this form. For those students who are **over 18**, with capacity, they can be supported to complete and sign the form themselves).

Hereward College would like to take images/recordings of you for promotional and 'other types of communication' purposes. Unless you or your parent/guardian provide consent your images will not be shared with or disclosed to any third parties. Please note that if we receive consent your images/recordings may be publicly available if published by ourselves or a third party.

To comply with Data Protection Legislation, we need either your or your parent's/guardian's consent before we capture your image or recording. Please ensure that you have read all the information contained within this consent form thoroughly before providing your explicit consent.

Hereward College may publish your images/recordings in any appropriate medium including, not limited to the following:

- Digital communications - Publications on websites, digital screens, and other online platforms (including social media platforms Facebook, X, and Instagram; iTunes U, YouTube). These generally include photographs, edited articles, interview transcripts, podcasts, videos, film and broadcast media.

- Print publications - Publications such as magazines, reports, postcards, envelopes, leaflets, prospectuses, and outdoor promotional material (including posters). These generally include photographs and edited articles, and promotion of digital materials.

- Other types of communication - Publications on news platforms, such as newspapers, magazines, television and radio shows, and/or any other media or distribution channel now known or to be invented.

Future use of materials

You can withdraw your consent for your images/recordings to be used in future publications and digital content at any time, but they cannot be removed from printed materials or videos which have already been created.

Please ensure that you are supported to understand the content of this form

Student Photo Consent Form

Student name:	**Date of Birth:**
CONTRIBUTOR'S RELEASE (above named student) I hereby give my consent to grant Hereward College the right to use pieces of the above-named students work, any quote stated by them, video and photographic images of them for all general purposes in relation to the work of Hereward College. This will include the right to use them in any publicity materials, whenever Hereward College chooses to do so. This may include: College website, printed publications, College social media, external media (newspapers, television, radio) and employer publicity materials.	Yes ☐ No ☐
EXTERNAL USE OF INFORMATION I hereby give my consent to grant Hereward College the right to use pieces of the above-named students work, any quote stated by them, video and photographic images of them for all general purposes by approved external organisations that have completed the Hereward College Permission to Use Imagery Form and have received written approval from the College. This will include the right to use them in any publicity materials, newsletters, books, magazines and newspaper articles, all other media forms including the company's website and social media sites, whenever they choose to do so.	Yes ☐ No ☐
I consent to Hereward College retaining images indefinitely after I leave the College for historical, alumni and archive purposes	Yes ☐ No ☐

By signing below, you are confirming that:

- You have read the guidance section above and asked any questions you needed to;
- You consent to the way in which the Hereward College plan to use images/recordings of you indicated by the boxes you have ticked above;
- The copyright in any images/recordings taken will belong to Hereward College and you will not receive payment or any other compensation in connection with the images/recordings;
- I understand that consent can be withdrawn at any time by contacting student.services@hereward.ac.uk. Images will not be used in future publications following withdrawal, but materials already published or distributed may not be recoverable or removable;
- I understand that photographs, videos and audio recordings published online may be copied, downloaded, altered, manipulated or combined with Artificial Intelligence (AI) technologies by third parties outside the control of Hereward College;
- I understand that whilst Hereward College will take reasonable steps to protect the use of images, it cannot guarantee that images placed in the public domain will not be subject to misuse or used to assist in identity fraud/theft.

I hereby consent to Hereward College using images/recordings
STUDENT/GUARDIAN'S NAME:
(If applicable) Relationship to student:

Signature: Date:

Appendix 2 – Permission to Use Imagery of a Hereward Student

Consent Form for the use of Personal Data and Photography/film and audio content from a 3rd Party provider.

If people such as journalists, work-based employers, professional photographers (not hired by Hereward 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.

The name/s of student/s wishing to share information about:	Date:
Name and address of the person/company wishing to use the imagery The reasons for taking the images and detail of where and how the images will be used How the imagery will be stored and for how long Confirmation that all reasonable adjustments will be made to protect the young person from harm in accordance with the Guidance and Procedure for photographing and filming young people	
By signing below, you are confirming that: • You have read the Hereward College guidance and procedure for photographing and filming of young people. • You have made reasonable adjustments to protect the young person from harm • You will store images in accordance with Data Protection protocols • You have discussed the content of the material with the student or students representative so they are clear what is being placed in the public domain. • Learner images, videos and recordings will not be used for the development, training or testing of Artificial Intelligence systems without separate explicit consent and written approval from Hereward College.	
Organisation: Name of Signatory: Position: Signature: Date:	
Internal Use only Approved by Manager: Date: Has approval letter been sent to external organisation? Date:	

Initial Equality Impact Assessment Screening

Name of Policy or Service	Guidance and Procedure for Photographing and Filming Young People
Author of impact assessment (name and job title)	Rosie Herbert Deputy Principal
Date impact assessment completed	Sept 2026
Is this a new or reviewed policy or service?	New policy/service ☐ Date of policy/service Reviewed policy/service ☒ Date of review Sept 2027

Briefly describe the aims and purpose of the policy	
Who is intended to benefit from this policy and in what way?	
What could contribute or detract from achieving the aims and purpose of the policy?	
What evidence or data has been collected and used to determine the impact on equality groups. Have any data gaps been identified.	

		Comments / Evidence
Has consultation on this policy indicated any possible concerns or issues in relation to equality, diversity and inclusion?	Yes ☐ No ☒	
Is there an opportunity to promote equality of opportunity by this policy?	Yes ☒ No ☐	

Potential impact on grounds of:

Race	Positive ☐ Negative ☐ No impact ☒	
Disability	Positive ☐ Negative ☐ No impact ☒	

		Comments / Evidence
Gender	Positive ☐ Negative ☐ No impact ☒	
Gender reassignment/identity	Positive ☐ Negative ☐ No impact ☒	
Age	Positive ☐ Negative ☐ No impact ☒	
Sexual orientation	Positive ☐ Negative ☐ No impact ☒	
Religion or belief	Positive ☐ Negative ☐ No impact ☒	
Marriage and civil partnerships	Positive ☐ Negative ☐ No impact ☒	
Pregnancy and maternity	Positive ☐ Negative ☐ No impact ☒	