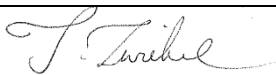


Sunbeams

PHOTOGRAPHY, FILMING & MEDIA POLICY

Document Control Sheet

Document Title	Sunbeams Photography, Film & Media Policy
Document Reference	SBP20
Version Number	17
Date Created	September, 2014
Date Approved	September, 2025
Next Review Date	September, 2026
Status	Approved
Approved By	Jessica Zwiebel, Safeguarding Officer and Trustee
Signature	

Revision History

Version	Date	Author	Description of Change	Approved By
1.0	Sep 2014	Admin	Initial release outlining rules for photography, filming, consent, and media use.	Board of Trustees
2.0	Sep 2015	Admin	Review	Board of Trustees
3.0	Sep 2016	Admin	Review	Board of Trustees
4.0	Sep 2017	Admin	Minor update to digital consent wording.	Board of Trustees
5.0	Sep 2018	Admin	Review	Board of Trustees
6.0	Sep 2019	Admin	Review	Board of Trustees
7.0	Sep 2020	Admin	Small clarification on parent/carer permissions.	Board of Trustees
8.0	Sep 2021	Admin	Review	Board of Trustees
9.0	Sep 2022	Admin	Review	Board of Trustees
10.0	Sep 2023	Admin	Minor update to storage and file-sharing guidance.	Board of Trustees
11.0	Jan 2024	Admin	Review	Board of Trustees
12.0	Apr 2024	Admin	Review	Board of Trustees
13.0	Sep 2024	Admin	Review	Board of Trustees
14.0	Jan 2025	Admin	Review	Board of Trustees
15.0	Apr 2025	Admin	Review	Board of Trustees
16.0	Jul 2025	Admin	Review	Board of Trustees
17.0	Sep 2025	Admin	Comprehensive review; strengthened media safety, digital permissions, and storage protocols.	Board of Trustees

1. Purpose and Scope

This policy sets out how Sunbeams manages and protects the use of photography, video recording, and other media involving children, young people, and families who use our services.

Its purpose is to:

- Protect the **safety, dignity, and privacy** of children and young people.
- Comply with the **Data Protection Act 2018** and **UK GDPR**.
- Respect the **cultural sensitivities** of the Orthodox Jewish community.
- Ensure that all use of media and imagery aligns with Sunbeams' safeguarding principles and values.

This policy applies to all staff, mentors, volunteers, contractors, visitors, and anyone acting on behalf of Sunbeams.

2. Legal Framework

Sunbeams recognises its responsibilities under:

- The **Data Protection Act 2018** and **UK GDPR**,
- The **Children Act 1989 & 2004**,
- The **Human Rights Act 1998**, and
- Relevant Safeguarding and Charity Commission guidance.

Photographs and video recordings are considered *personal data* when individuals can be identified.

Such data must therefore be obtained and processed lawfully, fairly, and securely.

3. General Principles

- Sunbeams prioritise the **protection and privacy** of every child and young person.
- No photographs, videos, or media content involving service users may be taken, stored, or shared without explicit written consent from the Director (and where required, parents/guardians).
- All staff and volunteers must act with **discretion, sensitivity, and respect** for community norms of modesty and privacy.
- Any breach of this policy may result in disciplinary action or termination of volunteering/employment.

4. Photography and Consent

- **Written consent** must be obtained before taking, storing, or using any images or recordings of children or families.

- Consent must be given by a parent or guardian, and by the child/young person if appropriate for their age and understanding.
- The consent form must specify:
 - The purpose of the image (e.g. internal use, publicity, records);
 - How long the image will be stored; and
 - Who will have access to it.
- Consent forms are stored securely by the Director or designated administrator in line with the **Data Protection Policy**.
- If consent is withdrawn at any time, all images must be deleted immediately.

5. Organisational Photography and Publicity

Occasionally, Sunbeams may wish to use photographs or videos for:

- Annual reports, funding applications, or training materials.
- Publicity (e.g. website, brochures, or social media); or
- Displays within the Sunbeams Centre.

In such cases:

- Specific written consent must be obtained for **each intended use**.
- Images will be carefully selected to ensure anonymity, modesty, and dignity.
- No identifying information (e.g. names, school, location) will ever be published without explicit consent.
- Only authorised staff may handle and store such media.

No external media organisations, journalists, or photographers may film or take photographs on Sunbeams premises or at Sunbeams activities without prior written approval from the Director.

6. Video and Digital Media Use

- Videos of children or mentoring sessions may only be recorded for **internal professional purposes**, such as training, supervision, or safeguarding review.
- All recordings must be stored securely on Sunbeams' encrypted systems and deleted once the purpose is fulfilled.
- Videos must never be shared, copied, or uploaded to personal devices, cloud services, or messaging apps.
- Mentors and staff are **strictly prohibited** from taking photographs or videos on personal phones, cameras, or tablets.

7. Storage, Retention, and Deletion

- All authorised images and videos are stored on Sunbeams’ secure, password-protected systems.
- Files are accessible only to authorised staff (Director, Safeguarding Lead, or Admin Officer).
- Images will be retained only for as long as necessary for their intended use and then deleted securely.
- Any unauthorised image found on personal devices must be reported and deleted immediately.
- All devices used for official photography must be encrypted and owned or approved by Sunbeams.

8. Roles and Responsibilities

Role	Responsibility
Director / Safeguarding Lead	Overall responsibility for ensuring compliance, reviewing consent processes, and approving any authorised use of media.
Staff & Volunteers	Must read and follow this policy, obtain consent where required, and immediately report any misuse or breach.
Trustees	Oversight of compliance and policy review as part of annual safeguarding and governance reporting.

9. Reporting and Breaches

Any concerns, accidental breaches, or suspected misuse of media must be reported **immediately** to the Director or Safeguarding Lead.

Examples include:

- An unauthorised image taken during a session.
- An image posted online without consent; or
- Any request for photos from external parties (e.g. schools, journalists).

A record will be made in the **Incident Log**, and any safeguarding implications will be managed under the **Safeguarding Policy**.

10. Training and Awareness

- All staff and volunteers receive guidance on this policy during induction and annual safeguarding training.
- Ongoing reminders are provided through supervision and team meetings.
- The Director and Trustees review compliance annually and update training materials as needed.

11. Monitoring and Review

This policy is reviewed annually by the Director and Trustees to ensure it remains aligned with legal requirements, community sensitivities, and Sunbeams' safeguarding framework.

Feedback from staff, mentors, and families is encouraged to ensure the policy remains practical and culturally appropriate.

Signed: _____ **Position:** Trustee

Date: _____