Compass Learning & Education

Photography, Filming and Social Media Consent Policy

Policy owner	Director / Designated Safeguarding Lead
Approved by	Director
Review cycle	Annual, or sooner following a material change, incident or change in guidance
Date of next review	June 2027

1. Purpose and Scope

Compass Learning & Education will use photographs, video, audio and social media responsibly, lawfully and in a way that protects learner dignity, privacy, safety and safeguarding. Images are never more important than a learner's welfare.

This policy applies to images, video, audio recordings, learner work, live-streaming, websites, social media, newsletters, marketing materials, internal records and images taken at trips, events or the shared church-house site.

2. Principles

- The welfare, dignity, safety and best interests of each learner are central to decision-making.
- Arrangements are proportionate to learner age, maturity, SEND, SEMH presentation, medical needs, trauma history and assessed risk.
- Staff must act promptly, record significant decisions and seek advice or escalate concerns where needed.
- This document operates alongside the Safeguarding and Child Protection Policy, Health and Safety Policy, Risk Assessment Policy, Behaviour and Positive Relationships Policy, and the shared-premises arrangements for the church-house site.

3. Roles and Responsibilities

Director / Data Protection Lead

- Approve use of images and ensure privacy notices, consent records and retention arrangements are in place.
- Assess safeguarding risks before any public use of an image, including restrictions arising from court orders, care arrangements or exploitation risk.

- Respond to requests to withdraw consent or concerns about online content promptly.

Staff

- Use only Compass-approved devices, accounts and storage arrangements for official images.
- Check the learner's consent status before taking or sharing identifiable images.
- Never use personal social-media accounts to post learner images or communicate with learners.

4. Consent and Lawful Use

Compass will normally obtain written consent before using identifiable learner images for public-facing purposes, such as the website, social-media channels, brochures, press releases or promotional materials. For learners under 18, consent will normally be sought from a parent or carer with relevant parental responsibility, alongside the learner's views. For learners aged 16 or over, Compass will also seek the learner's own agreement where they have capacity to make the decision. Consent can be withdrawn at any time for future use.

- No learner will be disadvantaged for declining consent. An alternative activity or non-identifiable method of celebrating work will be offered.
- Staff will use image consent categories so that consent for internal learning records is clearly distinct from consent for public marketing or social media.
- Where an image is necessary for a safeguarding, educational-record or identification purpose, Compass will identify an appropriate lawful basis and will explain this in its privacy information. Consent will not be treated as the only basis for all processing.
- Consent will be reviewed annually and whenever a learner's circumstances change.

5. Safe Photography and Filming

- Images must be appropriate to the learner's age and context and must never be degrading, intrusive, sexualised, embarrassing, unnecessarily revealing, or likely to increase safeguarding risk.
- We will not combine a full learner name with a photograph in public materials. We will avoid publishing location details, timetables, school names, journey information or other information together with a learner’s name that could make a learner easier to identify or locate.
- We will take account of individual safeguarding plans, looked-after status, court orders, adoption arrangements, risk from family members, exploitation risk and learner preferences.
- Photography in toilets, changing spaces, first-aid areas or other private settings is prohibited.
- Visitors and other community location users may not photograph or film Compass learners. Where this is seen to be happening, our staff will intervene.

6. Social Media

Official Compass social-media accounts will be managed only by authorised staff. Content will be approved before posting and will follow the agreed consent record. Comments, direct messages and tags will be monitored. Staff must not accept or initiate social-media connections with current learners through personal accounts, nor engage in private messaging outside approved professional channels. Any online safeguarding concern, harmful content or contact from an unknown adult must be reported to the DSL immediately.

7. Storage, Retention and Withdrawal of Consent

- Images will be stored only on approved, access-controlled systems. They will not be stored indefinitely on personal devices, removable media or unapproved cloud services.
- If consent is withdrawn, Compass will stop future use as soon as reasonably practicable and remove the image from controlled channels where possible. It may not be possible to remove copies already held by third parties or archived print material, but Compass will explain action taken.
- Images used in learner records will be retained in line with the Records Retention Schedule. Marketing images will be reviewed regularly and deleted when no longer needed.

Appendix A - Consent Categories

Category	Consent choice
Internal learning and assessment records	Yes / No
Compass website	Yes / No
Compass social-media accounts	Yes / No
Printed marketing materials	Yes / No
Local press or partner publicity	Yes / No
Learner work displayed without name	Yes / No

References and Linked Documents

- UK GDPR and Data Protection Act 2018.
- ICO advice: Taking photographs - data protection advice for schools.
- Data Protection and Confidentiality Policy; Safeguarding and Child Protection Policy; Staff Code of Conduct; Shared Premises Safeguarding and Site Security Protocol.