Photography, Filming & Sharing Images Policy

Version: 2.0

Review Date: September 2026 (annual review)

Approved By: CEO & Board of Trustees

Applies To: All Debate Mate staff, trustees, mentors, contractors, agency staff and volunteers

Relevant Legislation: UK GDPR & Data Protection Act 2018; Working Together to Safeguard Children 2026; KCSIE 2026 (proposed); Children's Wellbeing and Schools Act 2026; Human Rights Act 1998; Children Act 1989 & 2004; Online Safety Act 2023

1. Policy Statement

Debate Mate is committed to safeguarding the welfare of all children and young people with whom it works. This policy sets out how Debate Mate will take, use, store and share photographs and video recordings involving children and young people ('images'), whether in school settings, at events, or through online and digital programmes.

The safeguarding of children is paramount. The use of images of children presents specific risks including identification, grooming, and online exploitation. This policy mitigates those risks while enabling Debate Mate to promote its work responsibly.

This policy must be read alongside:

- Debate Mate's Child Protection and Safeguarding Policy
- Debate Mate's Online Safety Policy
- Debate Mate's Data Protection and Privacy Policy
- Debate Mate's Media Consent Form (2025/26)

2. Scope and Application

This policy applies to all Debate Mate staff including trustees, employees, coaches, mentors, independent contractors, agency staff and volunteers ('Staff'). It applies to:

- All photography and video recording at Debate Mate events, tournaments, and school delivery sessions;
- All online or virtual sessions where recordings may be made;
- All images shared via Debate Mate's digital platforms, social media channels, website, publications, and marketing materials.

This policy applies to images taken by Debate Mate staff, approved third-party photographers, and — where relevant — parents, carers, or school staff attending Debate Mate activities.

3. Legislative and Regulatory Framework

This policy is informed by and compliant with the following legislation and statutory guidance:

- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 — images of

identifiable individuals constitute personal data; images of children are treated as sensitive data requiring heightened protection.

- Working Together to Safeguard Children 2026 — requires organisations working with children to have robust safeguarding governance, including safe use of technology and digital media.
- Keeping Children Safe in Education (KCSIE) 2026 (proposed) — sets out expectations for safe use of images and online safety in educational contexts.
- Children's Wellbeing and Schools Act 2026 — strengthens duties on organisations working in schools to protect children from harm, including online and digital harm.
- Online Safety Act 2023 — imposes duties to protect children from harmful content, including the misuse of child images online.
- Children Act 1989 and 2004 — underpins the paramountcy of children's welfare in all decisions.
- Human Rights Act 1998 — protects the right to privacy (Article 8) and freedom of expression (Article 10), both of which must be balanced in image use decisions.

4. Consent

4.1 Requirement for Consent

No images of children or young people under 18 will be taken, used, or shared without valid, informed, freely given, and recorded consent from a person with parental responsibility. Where a child is 13 years of age or older, their own agreement should also be sought in addition to parental consent.

Consent must be:

- Obtained before images are taken;
- Specific to the purpose(s) for which images will be used (e.g. social media, print, broadcast);
- Documented, either on Debate Mate's official Media Consent Form or through a school consent process that meets the requirements of Section 4.2;
- Freely given — children and families must understand they may decline without disadvantage;
- Capable of being withdrawn at any time.

4.2 Consent Process in Schools

Debate Mate works in partnership with a large number of schools, and its consent process reflects when photography is likely to take place:

- Debate Mate does not take photographs or video recordings during routine after-school club sessions. Photography and filming only take place at events, competitions, and school trips.
- Each school's Memorandum of Understanding (MoU) with Debate Mate confirms that photography and video permissions for Debate Mate activities will be included in the school's trip letters or event consent. The school is responsible for obtaining this consent from parents/carers.
- The permission wording in trip letters must cover the ways Debate Mate intends to use images (as set out in Section 7), including social media and sharing with partners, and not only the school's own use. Debate Mate will provide schools with suggested wording and its Media Consent Form to support this.
- Debate Mate will keep a copy of the signed consent, or a record of the lead teacher's written or oral confirmation of consent, with the event or trip records, stored in line with Section 6. Where

confirmation is given orally (for example, at the registration desk of a large event), Debate Mate staff must record it at the time, noting the school, the teacher's name, and any students who must not be photographed or filmed, and where practical ask the teacher to initial the record.

- The lead or accompanying teacher is Debate Mate's point of contact for consent. Debate Mate staff are not expected to contact each school's Designated Safeguarding Lead (DSL) directly; the lead teacher is asked to liaise internally with the DSL and relevant colleagues about permissions for their students.
- Where students attend a Debate Mate event without a school trip letter, Debate Mate's own Media Consent Form must be used.
- Before any photography or filming begins at an event or trip, Debate Mate staff must confirm with the lead teacher which students have consent and whether any student must not be photographed or filmed for safeguarding reasons (for example, a looked-after child or a child subject to a court order). This check must be noted on the event record. Any student whose consent cannot be confirmed must not be photographed or filmed in a way that identifies them. If a teacher raises a safeguarding concern, Debate Mate will follow it up with the school's DSL.

4.3 Withdrawing Consent

Any individual (or parent/guardian on behalf of a child) may withdraw consent at any time. Upon withdrawal:

- No further images of that individual will be taken or used;
- Debate Mate will take reasonable steps to remove existing images from future publications and active digital platforms. Where images have already been published (e.g. in printed materials or broadcast), complete removal may not be possible, and this will be explained to the individual.
- A record of the withdrawal will be maintained by the Designated Safeguarding Lead.

5. Taking Photographs and Video Recordings

5.1 Authorised Photography

Photography and videography of children and young people is only permitted:

- By Debate Mate staff acting within their role;
- By photographers and videographers who have been formally approved by Debate Mate in advance;
- During events, competitions, school trips, training sessions, or other pre-arranged occasions, in line with Section 4.2 (routine after-school club sessions are not photographed or filmed).

All approved external photographers and videographers must:

- Have a current enhanced DBS/Disclosure check (or equivalent);
- Receive a copy of this policy and sign to confirm they have read and will comply with it;
- Never have unsupervised or one-to-one access to children. They must work only in areas where Debate Mate staff or school staff are present, but do not need to be accompanied by a dedicated member of staff throughout;
- Report to a named Debate Mate staff contact at each event, who will brief them on any children who must not be photographed or filmed and remain their point of contact throughout;
- Carry out any filmed interviews or small-group filming with children in an open, visible space with a member of Debate Mate or school staff present;

- Wear visible identification at all times while working at Debate Mate activities;
- Not contact children directly, or request or keep children's personal contact details or social media accounts;
- Obtain approval from Debate Mate before publishing any photographs or footage;
- Pass all footage to Debate Mate as soon as practicable and not publish it elsewhere without written permission from Debate Mate. Where footage is commissioned by, or produced with, a client or partner, it may also be passed to that partner under the written agreement described in Section 7.4. Once footage has been delivered as agreed, all copies must be deleted from the videographer's own devices and storage.

5.2 Prohibited Photography

The following are strictly prohibited:

- Photography or recording in changing areas, toilets, or any private spaces;
- Any image that could be construed as sexual, inappropriate, or degrading;
- Any image taken without the knowledge of the child or young person (covert recording);
- Photography of any child or young person for whom consent has not been confirmed;
- The sharing of images with any third party not authorised under this policy.

5.3 Online and Virtual Sessions

Where Debate Mate delivers sessions online or via video conferencing platforms:

- Sessions involving children must not be recorded without the explicit prior consent of parents/carers and the school or organisation;
- Recording for safeguarding or quality assurance purposes must be communicated clearly in advance;
- Recordings must be stored in accordance with Section 6 of this policy and must not be shared on social media or public platforms without consent;
- Debate Mate staff must not take screenshots of video calls involving children.

5.4 Appropriate Image Content

All images of children must:

- Show children in appropriate clothing;
- Portray children in a positive and dignified manner consistent with their participation in Debate Mate's activities;
- Not include any personal information (e.g. school name, location, full name) in captions or metadata unless operationally necessary and consented to.

Children's full names must not appear alongside their photographs in any published or digital material.

6. Storing Images of Children

Debate Mate will ensure that all images of children and young people are stored securely and in compliance with the UK GDPR and Data Protection Act 2018.

- All images and video footage will be stored in a secure, password-protected, encrypted system accessible only to authorised Debate Mate staff with a legitimate need.

- Access rights will be reviewed annually by the CEO, Executive Director or designated officer.
- Images must not be stored on personal devices, unencrypted USB drives, unencrypted laptops, or any portable storage unless operationally essential.
- If images must temporarily be held on a personal device (e.g. at an event), they must be transferred to the secure system as soon as practicable and deleted from the personal device immediately after transfer. Transfer must be confirmed with the line manager or DSL.
- Images will only be retained for as long as is necessary for the purpose for which they were taken. A retention schedule will be maintained by the Data Protection Officer (or equivalent).
- Upon expiry of the retention period, images will be securely deleted or destroyed.

7. Sharing and Publishing Images

7.1 Debate Mate's Use of Images

Debate Mate may use images of children and young people — where valid consent has been obtained — for the following purposes:

- Debate Mate's website and digital platforms;
- Social media channels (currently: LinkedIn, Facebook, X/Twitter, YouTube, Snapchat, Instagram);
- Print and digital promotional materials, annual reports, and fundraising content;
- Press releases and media engagement.

7.2 Third-Party Sharing

Debate Mate may share images with third parties for the purposes set out in the Media Consent Form, including:

- Media organisations, sponsors, and partners supporting Debate Mate's work;
- Educational institutions, funding bodies, and corporate partners;
- Broadcasters (e.g. the BBC) for reporting on Debate Mate's programmes.

Any third-party sharing must:

- Be covered by the consent given on the Media Consent Form;
- Be subject to a data sharing agreement or equivalent written arrangement where the third party will process the images;
- Be proportionate and limited to what is necessary for the stated purpose.

7.3 Parents, Carers, and School Staff at Events

Parents, carers, and school staff attending Debate Mate events or clubs are asked to:

- Read this policy before taking any photographs or recordings at the event;
- Restrict any personal photography to their own children;
- Not publish photographs on social media if other children are identifiable in the image, unless they have the consent of those children's parents/carers.

Debate Mate will communicate this expectation clearly at events and in written communications to schools.

7.4 Videos Commissioned by or Produced with Clients and Partners

Debate Mate sometimes works with clients and partners to produce videos of events featuring its students, for use as promotion or as examples of partnership work. These are usually filmed by Debate Mate's approved videographer. Where a video featuring Debate Mate students is commissioned by, or will be released by, a third party:

- The consent obtained under Section 4 must cover this use, including release of the video by the partner on its own channels;
- A written agreement with the partner must be in place before filming, setting out how the footage will be used, where it will be published, how long it will be kept, and who is responsible for it;
- Debate Mate must review and approve the final video before it is released by anyone;
- The partner must not name, tag or otherwise identify students, and must not use footage of any student who must not be filmed;
- The partner must agree to remove or edit the video, as far as reasonably possible, if a parent/carer withdraws consent (see Section 4.3);
- The requirements for external photographers and videographers in Section 5.1 apply, whether the videographer is engaged by Debate Mate or by the partner.

8. Online Safety and Digital Risk

In accordance with KCSIE 2026 (proposed) and the Online Safety Act 2023, Debate Mate recognises the specific risks that arise from the online sharing of children's images, including:

- Image-based grooming and online exploitation;
- AI-generated manipulation of images (deepfakes);
- Unauthorised scraping and repurposing of images from social media;
- Geo-tagging and metadata embedded in digital images that may disclose a child's location.

To mitigate these risks, Debate Mate will:

- Remove all location metadata from images before publishing online;
- Use privacy settings on social media platforms to limit the reach of images where possible;
- Never tag, name, or otherwise identify children in social media posts;
- Monitor social media platforms for unauthorised use of images and respond promptly to remove them;
- Ensure staff complete online safety training that includes safe image handling.

9. Reporting Concerns and Breaches

Any staff member who suspects that images of children are being misused, or who becomes aware of a breach of this policy, must report this immediately to the Designated Safeguarding Lead (DSL) at Debate Mate.

Where a breach involves personal data (as defined by the UK GDPR), this must also be reported to the Data Protection Officer (or equivalent). Reportable data breaches must be notified to the Information Commissioner's Office (ICO) within 72 hours of the organisation becoming aware.

Concerns from parents, carers, schools, or members of the public about the use of a child's image should be directed to:

- Director of Programmes, Debate Mate (contact details available at www.debatemate.org)

All reported concerns and breaches will be recorded, investigated, and acted upon in a timely manner. Where a concern suggests that a child may be at risk of harm, the matter will be escalated in accordance with Debate Mate's Child Protection and Safeguarding Policy and referred to relevant statutory agencies as appropriate.

10. Roles and Responsibilities

CEO / Executive Director - Overall responsibility for policy implementation, review, and compliance.

Designated Safeguarding Lead (DSL) - Receives and investigates concerns; maintains consent records; escalates safeguarding matters.

All Staff - Compliance with this policy; prompt reporting of concerns or breaches to the DSL.

Director of Programmes - Primary point of contact for external concerns from parents, carers, and schools.

11. Training

All Debate Mate staff will receive training on this policy as part of their induction and at least annually thereafter. Training will cover:

- The legal basis for taking and using images of children;
- How to obtain and record consent correctly;
- Safe storage and sharing of images;
- Online safety risks relating to images;
- How to respond to and report concerns.

12. Policy Review

This policy will be reviewed annually, or sooner in the event of:

- Relevant changes in legislation or statutory guidance (including KCSIE updates);
- A significant safeguarding incident or data breach relating to images;
- Organisational changes affecting how images are taken, stored, or shared.

The CEO is responsible for ensuring this policy is kept up to date and communicated to all staff.

Approved by Debate Mate's Board of Trustees on 22nd September 2026

Due for review in September 2027