

---

# Photography & Social Media Policy

**Policy Owner:** Oksana Logvynenko, CEO

**Date of Implementation:** 27.03.2025

## 1. Introduction

### 1.1 Purpose

This policy outlines Culturalinks Community CIC's approach to photography, videography, and social media use, with particular emphasis on obtaining appropriate consent for capturing and sharing images of staff, volunteers, service users, and members of the public involved in our activities.

### 1.2 Scope

This policy applies to all Culturalinks Community CIC employees, volunteers, trustees, contractors, and anyone representing the organisation. It covers all photography, video, and audio recording undertaken on behalf of the organisation, and the subsequent use of these materials on our website, social media platforms, printed materials, and any other forms of communication.

## 2. Legal Framework

Culturalinks Community CIC recognizes and will comply with relevant legislation including:

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Copyright, Designs and Patents Act 1988
- Human Rights Act 1998
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006

## 3. Photography and Videography Consent

### 3.1 General Principles

- No photographs or videos of identifiable individuals will be used without appropriate consent
- Consent must be freely given, specific, informed, and unambiguous
- Individuals have the right to withdraw consent at any time
- Special consideration must be given to vulnerable adults and children under 18

### 3.2 Consent Forms

Culturalinks Community CIC will use appropriate consent forms that clearly explain:

- What images will be taken
- How they may be used (website, social media, printed materials, etc.)
- How long they may be stored and used
- The individual's rights regarding the images

### **3.3 Children and Young People**

- For children under 18, written consent must be obtained from a parent or legal guardian
- For children aged 13-17, both the child's assent and parental consent should be obtained where practical
- Images of children will never be accompanied by detailed information that could enable someone to contact that child

### **3.4 Vulnerable Adults**

- Extra care must be taken when seeking consent from vulnerable adults
- Where a vulnerable adult lacks capacity to provide informed consent, consent should be sought from an appropriate representative
- Staff should be trained to recognize when additional support may be needed for an individual to understand what they are consenting to

### **3.5 Group Photography**

- For public events or large group settings, clear signage will be displayed indicating that photography is taking place
- Announcements will be made at the beginning of events
- A designated area will be provided for people who do not wish to be photographed where practical

## **4. Storage and Security of Images**

### **4.1 Image Storage**

- All images will be stored securely on password-protected devices or secure cloud storage
- Access will be restricted to authorized personnel only
- Images will be retained only for as long as necessary for the purpose they were taken
- A regular review and deletion schedule will be maintained

### **4.2 Image Labeling and Tracking**

- All images will be properly labeled with date, event information, and consent status
- A register of images will be maintained including consent information
- Any restrictions on use will be clearly noted

## 5. Social Media Usage

### 5.1 Authorized Social Media Accounts

- Only designated staff members are authorized to post on Culturalinks Community CIC's official social media accounts
- Login credentials will be securely stored and regularly updated
- All content must adhere to our values and mission

### 5.2 Content Guidelines

When posting on social media, staff must:

- Only use images for which proper consent has been obtained
- Respect privacy and dignity of all individuals
- Ensure content is accurate and not misleading
- Consider the reputational impact on Culturalinks Community CIC
- Follow brand guidelines for consistency
- Avoid political statements or controversial content unless directly related to our mission

### 5.3 Staff Personal Social Media Use

- Staff should be mindful that they may be identified as employees of Culturalinks Community CIC on their personal social media
- Staff should not share confidential information, images of service users, or material that could damage the organization's reputation
- Staff are encouraged to make clear that views expressed on personal accounts are their own and not those of the organization

## 6. Responding to Concerns

### 6.1 Removal Requests

- Requests for removal of images from our platforms will be actioned promptly
- A log of removal requests will be maintained
- The individual will be informed when the image has been removed

### 6.2 Breach Protocol

If a breach of this policy occurs:

- The incident will be reported immediately to the designated Data Protection Lead
- Affected individuals will be informed
- Remedial action will be taken promptly
- The incident will be documented and reviewed to prevent recurrence

## 7. Training and Awareness

### 7.1 Staff Training

All staff and volunteers will receive training on:

- The contents and requirements of this policy
- How to obtain proper consent
- Safe and ethical photography practices
- Social media best practices
- Data protection principles

### 7.2 Refresher Training

Refresher training will be provided annually or when significant changes occur to relevant legislation or this policy.

## 8. Monitoring and Review

### 8.1 Regular Audits

- Regular audits of image storage, consent records, and social media content will be conducted
- Findings will be reported to senior management
- Corrective actions will be implemented as needed

### 8.2 Policy Review

This policy will be reviewed annually or when there are significant changes to legislation or organizational structure. The review will consider:

- Legal compliance
- Effectiveness of the policy
- Any incidents or concerns raised
- Feedback from staff and service users

## 9. Roles and Responsibilities

### 9.1 CEO

- Overall accountability for policy implementation
- Final approval of significant communications

### 9.2 Data Protection Lead

- Day-to-day management of consent processes
- Responding to queries and concerns

- Maintaining consent records

### 9.3 Communications Staff

- Ensuring appropriate consent before publishing
- Secure storage of media files
- Management of social media accounts

### 9.4 All Staff

- Understanding and complying with this policy
- Obtaining proper consent when taking photographs
- Reporting any concerns or breaches

## Appendices

### Appendix A: Photography Consent Form

#### CULTURALINKS COMMUNITY CIC - PHOTOGRAPHY CONSENT FORM

Name of Individual: \_\_\_\_\_

Date: \_\_\_\_\_

Event/Activity: \_\_\_\_\_

I give permission for Culturalinks Community CIC to take photographs and/or video recordings of me (or the person named above for whom I am the legal guardian).

I understand these images may be used for:

- ☐ Website and online platforms
- ☐ Social media accounts
- ☐ Printed promotional materials
- ☐ Press releases and media coverage
- ☐ Funding applications and reports
- ☐ Educational or training purposes

I understand that:

- I can withdraw my consent at any time by contacting [insert contact details]
- My name will not be published alongside the image without additional specific consent
- The images may be kept for up to [insert time period] after which they will be reviewed
- I can request copies of images in which I appear

- No payment will be made for the use of these images

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Relationship to individual (if applicable): \_\_\_\_\_

Contact details (email or phone): \_\_\_\_\_

## **Appendix B: Social Media Guidelines for Staff**

### **Do:**

- Only share content that reflects our values and mission
- Respond promptly and professionally to comments and messages
- Credit photographers and content creators where appropriate
- Check facts before posting
- Consider timing and relevance of posts

### **Don't:**

- Share confidential information about our service users or staff
- Post images without appropriate consent
- Engage with negative comments in an unprofessional manner
- Mix personal and professional content on organizational accounts
- Share political opinions unless directly related to our mission

## **Appendix C: Photography Notification Sign Template**

### **PHOTOGRAPHY NOTICE**

Photography and/or video recording is taking place at this event.

The images may appear on our website, social media, and in promotional materials.

If you do not wish to be photographed, please:

- Inform a member of our team
- Sit/stand in the designated photography-free area
- Wear a red sticker

For questions or concerns, please speak to Oksana Logvynenko or contact us at [hello@culturalinks.co.uk](mailto:hello@culturalinks.co.uk)

## 10. Related Policies

This policy should be read in conjunction with:

- Data Protection Policy
  - Safeguarding Policy
  - Code of Conduct
  - Communications Strategy
  - Information Security Policy
- 

### **Policy Approved By:**

Oksana Logvynenko, CEO

Date: 27.03.2025