



# Photography and Image Use Policy

Pocket Money Adventures CIC

Version 1.0

Effective date: 24 April 2026

Review date: 24 April 2027

Approved by: Nathan Waldron, Director, on behalf of the Board of Directors (Pocket Money Adventures CIC)

## Pocket Money Adventures CIC

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**Designated Safeguarding Lead:** Nathan Waldron

**Deputy DSL:** Bernadette Houlton

## Purpose

This policy sets out how Pocket Money Adventures CIC handles photography and video at every point of its programme delivery — in schools, at events, in communications, and in any content produced about the programme. It protects children, respects parents, and sets a defensible default for PMA staff, contractors, and sponsors.

## Scope

This policy applies to:

- All PMA staff, contractors, and volunteers attending a school site
- All photography and video concerning children, regardless of who captures it
- All marketing, sponsor, website, and social media use of any image captured at a PMA event
- Any third party (including sponsors) photographing at a PMA-adjacent event

## Default position — no photography of children

PMA does not photograph or film children. Nathan does not take photographs or video of children. The class teacher does not take photographs of children for PMA's use. The headteacher does not arrange photographs of children for PMA's use. This is the default and the hard rule.

There is no such thing as a "quick classroom photo" for PMA use. Any image with any child visible is outside this policy and not produced.

## What can be photographed (with headteacher written approval)

- Still images of the A2 PMA classroom poster on a wall or easel — no children in frame
- Still images of the PMA books on a desk or shelf — no children in frame

- Still images of written work on pupil-pack pages — child's name and code removed before the image is captured

Any other images require a separate, written, case-by-case approval process between the school and the parent(s) of any child who would be in shot.

### **Approval process (for approved image types only)**

1. Nathan emails the headteacher at T-3 school days asking whether any still images are welcome for the visit, naming the exact images in plain English.
2. The headteacher replies in writing (email is sufficient) with Yes, No, or Yes-with-conditions for each image.
3. Nathan only takes the images named in the written approval. No others.
4. Any image that has any child even partially visible is deleted at source without being transferred off the camera device.
5. Approved images are stored on PMA's UK Microsoft 365 tenant, behind MFA. The approval email is stored alongside.

### **Parental consent for photography (the rare exceptions)**

Where an image is genuinely needed that includes a child (for example a specific sponsor case study, a published impact report, or a press opportunity agreed in advance), a separate consent process applies:

- Written, specific, per-use consent from the parent/carer of the child — generic consent is not acceptable
- Written sign-off from the headteacher
- Image never used for a different purpose than the one consented
- Image stored securely and deleted when the use period ends
- Child and parent have the right to withdraw consent at any time; PMA removes the image from all active channels within 5 working days

### **Social media use**

Per the Social Media Policy v1.0: no images of children on any PMA social account, regardless of consent, unless the per-use consent process above is completed and documented. First-name-only attribution only where explicitly consented. School names are not used alongside child images in any post.

### **Sponsor and press use**

Where a sponsor or press request arrives asking for child images, PMA refuses as a default. Separate consent-per-child per-use processes apply for any such request and would be managed by the school, not by PMA. Sponsors are briefed on this default at the point of contract.

### **Staff and adult photography**

Staff, directors, sponsors, and partners may be photographed with their own verbal or written consent. No specific process is required beyond the subject's explicit agreement. Photographs of PMA staff at work are fine for marketing and internal use.

### **Storage, retention, and deletion**

- Approved programme-material images are stored on PMA's UK M365 tenant, behind MFA, with role-based access.
- Images of children (the rare consented exceptions) are stored separately, with the consent record attached.

- Retention: 5 years for programme-material images; per specific consent for child images, and in any case not beyond the period stated in the consent form.
- Deletion: confirmed and logged. Where an image has been used externally, PMA requests deletion from third parties too.

### **Breach and escalation**

Any inadvertent image capture of a child (for example: a photo of the poster that catches a child in the corner of the frame) is:

6. Deleted at source — the camera device does not leave the school with the image on it.
7. Reported to the headteacher before leaving the site.
8. Logged as a near-miss in the Risk Assessment Register (row for image handling).

Any external-facing image that is later found to include a child without proper consent is removed immediately, the headteacher and parent are informed, and a breach entry is made in the Breach Register.

### **Why this standard is strict**

Any in-school child photograph carries a safeguarding risk — image reuse, third-party identification, online harm. The default-no position removes the risk entirely. The small number of images that PMA needs for a sponsor or white-paper visual appendix can be made without any children in frame. The cost of a strict default is very low; the cost of a lax default can be very high.

### **Linked policies and references**

- Children and Adult Safeguarding Policy v1.3
- Safeguarding Handbook v1.1
- Parental Consent and GDPR Pack v2.0 (Part 7 — photo consent)
- Social Media Policy v1.0
- Privacy Policy v1.3
- Data Breach Response Plan v1.0
- Risk Assessment Register v1.0 (RA-04)

### **Version history**

- v1.0 — 24 April 2026. Standalone policy extracted from Parental Consent Pack v2.0 Part 7. Aligned to KCSIE 2025 safeguarding-by-image expectations. Review annually.

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