

Young People's Images Policy

Document Owner:	Legal Services
Classification:	Public
Document Identifier:	POL_YoungPeoplesImagesPolicy.docx
Internal/External use:	External
Approval:	Policy Management Group
Document Status:	Final
Version:	0.2
Date Issued:	23.01.2020
Last Review:	20.05.2024
Last Modified:	20.05.2024
Next Review:	20.05.2025

This document is intended for Trinity College London (TCL) personnel and authorised external parties. This document must be handled in accordance with the TCL classification policy

Policy Title

Printed copy of this document is uncontrolled and should not be relied upon as the most up to date version.

Table of Contents

Aims of the Policy.....	3
Scope.....	3
Consequences of Breach.....	3
Guiding Principles	3
Overlap with other Trinity Policies	4
Change Control	4
Change History.....	4
Change Approval.....	5

Aims of the Policy

Trinity College London ('Trinity', 'us', 'we') uses images of young people as a way of promoting its activities and celebrating young people's achievements.

The use of young people's photographs and videos, when released in the public domain (for example when posted online), may pose direct or indirect risk to children and young people if not managed correctly.

This policy is designed to ensure that young people's images commissioned for or on behalf of Trinity for promotional and academic purposes are used in a fair and proper manner, with the necessary measures put in place in order to avoid any potential harm.

Scope

This policy applies to:

- all Trinity employees and workers, Trustees, agency staff or contractors
- all consultants and other service providers engaged by Trinity in the development, delivery or award of its qualifications, including the staff of Trinity Group companies

This policy relates to the creation and use of young people's photographs and videos in the course of Trinity's academic, product and promotional activities. By young people, we mean everyone aged 18 and under.

This policy does not apply to recordings of candidates taken during exam sessions, as the latter are governed by Trinity's exam specifications.

Recordings taken during exam sessions do not require consent from young people's carers because these are made strictly to ensure the fairness and transparency of Trinity's assessments. Recordings of exam sessions are strictly confidential and may not be released in the public domain. Likewise, candidates are not entitled to make their own recordings during an exam session.

This policy also does not apply to photos and recordings taken by young people outside of the exam session. Young people and their parents/carers are entitled to create lasting memories of their exam experience and their subsequent achievements. For example, it is perfectly acceptable for young people to take 'selfies' following their session.

Finally, this policy does not apply to the storing of candidates' photographs and ID processed for verification purposes, for example prior to attending SELT exams. This area is governed by our [Candidate Identification and Security Policy for Trinity SELTs](#) and our Data Retention [Policy](#).

Consequences of Breach

Compliance with this policy is mandatory. Breaches may result in:

- disciplinary proceedings up to and including dismissal for Trinity employees
- immediate termination of contract for workers, agency staff, contractors and other service providers
- termination of appointment

Guiding Principles

We have adopted the following principles, based on the NSPCC's template for using photography and sharing images of young people. Please follow these principles at all times:

- Do not use young people’s names (or other identifying information such as the name of a school or school logo) in captions as these will make them easily identifiable, unless this is the main purpose of the image (for example, announcing the winner of a competition).
- Use parental permission forms to use young people’s recordings, unless the recording is of a very large event whereby it would not be possible to obtain individual permissions.
- Make it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published.
- Only use images of young people in suitable poses and in suitable clothing to reduce the risk of inappropriate use. Some activities, for example dance and drama, present a greater risk of potential misuse.
- Only share recordings via Trinity-approved social media channels Images and video recordings of young people must be kept securely. Electronic images should be kept in a protected folder with restricted access. Images should not be retained on unencrypted portable equipment such as laptops, memory sticks or mobile phones.
- If a child or their parent does not consent to photographs being taken, we will respect their wishes and agree in advance how they would like to be identified. We will never exclude a child from an activity because we do not have consent to take their photograph.
- Images should be retained / destroyed in accordance with the guidance set out in our Data Retention [Policy](#), Data Retention [Schedule](#), Data Destruction [Policy](#) and [Data Destruction Procedure](#).
- For further guidance on the above, please see our Young People’s Images – Guidelines at the end of this policy.

Overlap with other Trinity Policies

This policy should be read in conjunction with the following other Trinity policies:

- [Data Protection Policy](#)
- [Data Retention Policy](#) and [Schedule](#)
- [Data Destruction Policy](#)
- [Data Destruction Procedure](#)
- Child-Vulnerable Adult Safeguarding Policy

Change Control

Change History

The following changes have been made to this document:

Version	Date	Author	Change Summary
0.1	2020.01.23	General Counsel	New policy
0.2	2024.05.20	General Counsel	Update to formatting. Inserting additional references to other policies and procedures.

Change Approval

The changes to this document have been approved by the following personnel:

Version	Date	Approver
0.1	2020.01.23	Trinity's Executive
0.2	2024.05.22	Policy Management Group

YOUNG PEOPLE'S IMAGES GUIDELINES

Clearance:

Written consent should always be obtained from the parents/carers of any young person who is being photographed or filmed for the purpose of developing Trinity promotional or academic/training materials. Template permission forms are developed by the Legal department and are made available through a central repository available on the Legal G-Drive in the open library section under templates/permission forms – photos/films and sound recordings. Among other matters, these template permission forms bring Trinity's [privacy statement](#) to the attention of the parents/carers of the young person so that they have access to more detailed information around how Trinity collects and processes the personal data of the young person.

The person commissioning photographs or videos on behalf of Trinity would normally be responsible for obtaining completed permission forms. The permission forms must clearly explain why we are taking photos and videos, and what we intend to do with them.

Ideally, the permission forms will be sent out to parents/carers at least two weeks in advance of the event in order to give them sufficient time to consider whether they agree for the young people to participate in the video or photoshoot, for the purposes stated in the form. If a parent disagrees, you may not capture or collect the child's photo or video.

Content suitability:

Remember that all content must be checked in order not to attract unwarranted interest from third parties. Upon editing, consider whether the content is appropriate or suitable for your audience. If in doubt, it is better to destroy images than to keep them. The overriding principle is to safeguard young people, and this takes priority over any other objectives, be they academic or promotional in nature.

Sharing content:

You must also consider the channels through which any recordings are disseminated in the public domain. Sadly, it is difficult to ensure that content does not fall into 'the wrong hands' once it is put out there. Remember that all content must be checked in order not to attract unwarranted interest from third parties.

Storage and retention:

Images should not be retained on personal cameras, phones or any other devices. Names and addresses of children in images should not be stored alongside the actual images; rather a coding

system should be used for the recordings, with separate files used to record contact details for the parents/carers in case there is a need to contact them in future (these would be lifted from the permission forms).

All retained images must be stored securely in a password-protected folder – for example, the Marketing team has created a central folder for the team to store all completed permission forms and the corresponding template forms.

Images for which a finite, fixed-term purpose was specified at the outset should be destroyed once the project is complete. Project completion is defined as: once images or streaming have been used for their purpose and are no longer required to be kept.

Images/footage commissioned for a library bank, for example for marketing materials, can be kept until such time as it is decided that they no longer have any relevance to Trinity's image / original purpose. At present, our Data Retention Policy and Schedule specify that these can be kept indefinitely, although it is good practice to sift through records on a regular basis and take a view as to whether their retention is still appropriate.

As set out in the Data Retention Schedule, you will need to balance this against Trinity's overall aims as a charity - it may be deemed to be in the public interest for some of our records to be preserved for future generations since, as a charity, it is in the public interest for Trinity to keep historical records of its activities over the years. However, please note that where personal data is retained for historical purposes, then such personal data should only be used for such purposes and cannot be used for any other purposes.