



Photography and Image Use Policy

FlyForward uses images responsibly, transparently, and with respect for the privacy and dignity of every individual

Policy Owner	Board of Trustees - FlyForward
Policy Title	Photography and Image Use Policy
Designated Safeguarding Lead	Robert Pegg - robert.pegg@flyforward.co.uk - 07500 475477
Version	1.0
Date Adopted	March 2026
Next Review Date	March 2027
Applies To	All trustees, staff, volunteers, and contractors
Operational Context	UK-wide, school & aviation education settings, ages 13-25+

1. Purpose

Photography and video are valuable tools for capturing the achievements of our participants and communicating FlyForward's impact to the wider world. At the same time, we recognise that images of individuals - particularly children and young people - carry significant privacy and safeguarding implications. This policy sets out how FlyForward captures, uses, stores, and manages images in a way that is lawful, transparent, and respectful of every person's rights.

2. Legal Framework

- UK GDPR and Data Protection Act 2018 - photographs of identifiable individuals are personal data and must be handled lawfully
- Children Act 2004 - duty of care and protection of children's welfare
- Online Safety Act 2023 - restrictions on harmful or non-consensual image sharing
- Safeguarding Vulnerable Groups Act 2006 - protection of children in regulated activities
- ICO Guidance on taking photographs in public, and photographs of children
- UK GDPR Article 6 (lawful basis for processing) and Article 9 (children's images as special category data)

3. Scope

This policy applies to all photography and video recording at or in connection with FlyForward activities, whether captured by:

- FlyForward staff or volunteers
- Professional photographers commissioned by FlyForward
- Third parties at FlyForward events (e.g., media outlets, partner organisations)
- Participants or families who submit images to FlyForward for use

It covers all platforms and uses including the FlyForward website, social media, press releases, funding applications, printed materials, and internal records.

4. Consent Requirements

FlyForward will obtain valid, informed, written consent before intentionally photographing or filming an identifiable individual, and before using any such image. Participation in a FlyForward programme does not constitute consent to be photographed.

- Participants under 16: written consent must be obtained from a parent or guardian before the event
- Participants aged 16-17: consent may be given by the young person themselves; parental consent is also sought as best practice
- Adults (18+): written consent is obtained directly from the individual
- Consent forms clearly specify the types of use permitted (e.g., website, social media, printed materials) and the duration of consent
- Consent is freely given and may be withdrawn at any time without disadvantage or penalty

Where the purpose or context of use changes materially from what was originally communicated, fresh consent will be obtained before the image is used.

5. Opting Out - How to Decline Photography

FlyForward respects the right of any individual to decline to be photographed or filmed. Anyone who does not wish to be captured in images at a FlyForward event - whether a participant, family member, or visiting adult - should make this known explicitly by:

- Informing the event coordinator or lead volunteer before or at the start of the session
- Telling any FlyForward staff member or volunteer present at any point during the event

Once an opt-out is communicated, it will be noted and shared with all FlyForward photographers and staff present. The individual will not be intentionally photographed or filmed for the remainder of the event. No explanation is required and no one will be disadvantaged for opting out.

6. Background Capture - Incidental Appearances

FlyForward acknowledges that at busy events - such as open days, group activities, and aviation sessions - it is not always possible to guarantee that individuals who have not given consent will not appear incidentally in the background of photographs or footage. Where such incidental capture occurs, FlyForward will take the following steps before any image is used or published:

- All images will be reviewed prior to publication to identify any unconsented individuals who are clearly identifiable

- Where an unconsented individual is identifiable in an image FlyForward wishes to use, their face will be digitally blurred or obscured before the image is published or shared
- Where effective blurring is not possible, the image will not be used
- Individuals who have explicitly opted out will be given priority consideration during the review process

FlyForward will maintain a record of any edits made to images for this purpose. The original unedited images will be stored securely and not shared.

7. Permitted Uses of Images

Where valid consent has been obtained (and any required blurring applied), images may be used for:

- The FlyForward website (flyforward.co.uk)
- FlyForward's official, managed social media accounts
- Press and media coverage in connection with FlyForward activities
- Funding applications, impact reports, and grant communications
- Internal training and programme documentation
- Printed materials such as newsletters, leaflets, and event programmes

8. Prohibited Uses

The following are strictly prohibited without exception:

- Publishing any image of an identifiable individual without valid consent or required blurring
- Publishing identifying information (full name, school, home address) alongside a child's photograph unless explicitly authorised for that specific purpose
- Staff or volunteers sharing images of participants on personal social media accounts, even with good intent
- Using images for commercial purposes beyond FlyForward's charitable activities without additional, specific consent
- Sharing images in a way that could enable a child to be identified and located by harmful individuals
- Storing images of participants on personal devices

9. Social Media and Online Sharing

Only FlyForward's official, managed accounts may post images involving participants. When sharing on social media, FlyForward will:

- Not publish the full names of young people alongside their images without specific consent for that purpose
- Disable geotagging on all images before posting to avoid disclosing locations
- Not repost or share images in response to comments without confirming consent applies to that new context
- Remove any image shared in error or without proper consent promptly and log the incident

10. Professional Photography and Media at Events

Where professional photographers or media representatives attend FlyForward events, they will be required to:

- Read and sign an agreement confirming compliance with this policy before capturing any images
- Follow all instructions from FlyForward staff regarding who may and may not be photographed
- Submit all images to FlyForward for review before publication

All attendees will be notified in advance - via event information or on arrival - that photography will be taking place, and given a clear opportunity to opt out in line with Section 5 of this policy.

11. Storage, Retention and Deletion

- All images involving identifiable individuals are stored only on secure, access-controlled FlyForward systems
- Images must not be stored on personal devices of staff or volunteers
- Images will be retained only for as long as necessary for the purpose for which consent was given
- When consent is withdrawn or expires, images will be removed from all platforms and deleted from storage within 30 days
- All images of children will be reviewed at least annually; those no longer needed will be securely deleted
- Edited images (e.g., where faces have been blurred) will be retained separately from originals, with the original stored securely and never shared

12. Breaches and Incidents

Any suspected breach of this policy - including unauthorised publication, accidental sharing, or any situation where images of a child may have been accessed or used without consent - must be reported to the DSL immediately. Depending on the nature and severity of the breach, this may also constitute a personal data breach under UK GDPR, requiring notification to the ICO within 72 hours. All breaches will be logged and reviewed.

13. Responsibilities and Monitoring

Compliance with this policy is the responsibility of all FlyForward staff, volunteers, and commissioned photographers. Specific responsibilities are:

- DSL: annual review of consent records, stored images, and platform usage; oversight of any breach response
- Event coordinators: briefing photographers, communicating opt-out rights to attendees, and noting opt-outs before sessions begin
- All staff and volunteers: not photographing individuals without direction from the event lead; reporting any concerns immediately

Breaches of this policy may result in disciplinary action. This policy will be reviewed annually by the Board of Trustees, or sooner following a significant incident or change in legislation.

Related Policies

- Privacy and GDPR Policy
- Online Safety Policy
- Safeguarding Adults and Children Policy
- Anti-Bullying and Harassment Policy
- Complaints Policy

Policy Sign-Off

By signing below, the Chair of Trustees confirms this policy has been reviewed, approved, and adopted by the FlyForward Board of Trustees.

Name (print)	
Role	Chair of Trustees
Signature	
Date Approved	
Next Review Date	March 2027

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