



Photography, Filming and Media Policy

Policy Review

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Version 1

This policy will be reviewed in full by Razzamataz Theatre Schools on an annual basis.

Policy reviewed and agreed by Razzamataz Theatre Schools in September 2026

Due for review in September 2027.

1. Purpose

Razzamataz recognises that photographs, video, audio and other recordings can support teaching, document performances and celebrate students' achievements. It also recognises that images and recordings are personal data when an individual can be identified and that misuse - including manipulation through artificial intelligence (AI) - may expose children and adults at risk to embarrassment, harassment, exploitation, grooming or other harm.

This policy establishes safe, respectful and lawful arrangements for creating, storing, using and sharing images and recordings. The welfare, dignity, privacy and wishes of the student take priority over promotional or commercial interests.

2. Scope

This policy applies to:

- all employees, Principals, franchisees, teachers, assistants, chaperones, freelancers, volunteers and contractors;
- photographs, video, livestreams, audio recordings, screenshots, performance recordings and digital or AI-generated content;
- classes, rehearsals, performances, events, trips, online sessions and any activity organised in Razzamataz's name; and
- Razzamataz-controlled websites, social-media accounts, messaging channels, printed materials and advertising.
- Parents, carers, audience members, visitors and students are expected to comply with any recording arrangements communicated for a class, performance or event.

3. Principles

- Images and recordings will only be created for a clear, legitimate and explained purpose.
- Only the minimum material reasonably needed will be captured and retained.
- Consent choices will be freely made, specific, informed, recorded and as easy to withdraw as to give. Refusal will not disadvantage a student.
- The student's wishes will be sought in an age-appropriate way and respected, even where a parent or carer has consented.
- Images will be appropriate, respectful and consistent with the activity. They will not be taken in toilets, changing rooms or other places where privacy is expected.
- Personal devices and personal accounts must not be used by staff, freelancers or volunteers to capture, store or share student images or recordings.
- Published material will avoid unnecessary identifying information and will not normally pair a student's full name with their image.
- No image or recording will be manipulated, repurposed or processed by AI outside the controls in section 10.

4. Roles and responsibilities

The Principal / Franchisee will:

- approve planned photography, filming, livestreaming and publication;
- ensure valid consent records and any restrictions are accessible to relevant staff before recording begins;
- approve photographers, videographers, platforms and storage arrangements and ensure appropriate contractual safeguards;

- ensure reasonable arrangements are made for students without consent to participate safely and without stigma;
- respond to concerns, breaches, takedown requests and suspected misuse, consulting the Data Protection Lead, safeguarding lead, police or other agencies where appropriate; and
- review this policy and related privacy information when technology, practice or risk changes.

Staff, freelancers and volunteers must:

- check authorisation and consent status before capturing or publishing material;
- explain what is being recorded and stop if a student appears uncomfortable or asks not to be recorded;
- use only authorised equipment, accounts and storage;
- avoid one-to-one or intrusive filming and remain alert to clothing, poses, camera angles and backgrounds that could compromise dignity or reveal sensitive information;
- make all material available for organisational scrutiny and be able to justify its creation; and
- report accidental capture, loss, unauthorised sharing, online misuse or suspected AI manipulation immediately.

5. Consent and the student's voice

Razzamataz will obtain recorded consent before planned use of an identifiable student's image or recording.

For a child, consent will normally be obtained from a person with parental responsibility and the child's views will also be sought. A student who is able to understand the decision should be involved directly; students aged 18 or over ordinarily provide their own consent. Where capacity or authority is uncertain, the Principal must seek advice before proceeding.

Consent will identify the intended channels and uses. Consent should be refreshed when the purpose changes and at suitable intervals. Separate, specific consent is required for any exceptional AI use; ordinary image consent does not authorise AI processing.

Consent may be withdrawn prospectively at any time. Razzamataz will stop new use and take reasonable steps to remove material from channels it controls. It may not be possible to recall printed material already distributed, material lawfully published before withdrawal, press coverage or copies made by others. These limitations must be explained clearly.

6. Taking photographs and recordings

- The Principal must know who will record, what will be captured, why it is needed, where it will be used, who will receive it and how long it will be retained.
- Recording must take place openly, using authorised organisational equipment wherever practicable. Where an approved professional uses their own equipment, transfer and secure deletion requirements must be agreed in writing.
- Students without consent should be positioned outside the camera frame or otherwise protected without being excluded from learning or treated differently. Group shots must be checked carefully before use.
- No covert recording is permitted except where specifically authorised for a lawful safeguarding, security or law-enforcement purpose.
- Images of injuries, medical matters or safeguarding evidence must not be taken by staff unless this is specifically directed under an approved procedure. Such material must never be used for publicity.

- Photography or filming must stop immediately if conditions become unsafe, undignified or inconsistent with the stated purpose.

7. Performances, audiences and family recording

Before an event, Razzamataz will state whether audience photography, filming or livestreaming is permitted. Arrangements will reflect consent restrictions, venue rules, licensing conditions and the nature of the performance. Where recording is allowed, audience members must be reminded that material is for personal use only unless further permission has been obtained, and that they must not identify, tag, commercially exploit or use images of other students in harmful or inappropriate ways.

Where a student must not be recorded for safeguarding or legal reasons, the Principal will implement a proportionate plan, which may include a no-recording rule, designated recording periods, controlled sightlines or use of an official recording. Staff must not disclose the reason for an individual restriction. Razzamataz will take reasonable steps to manage audience recording but cannot guarantee that no unauthorised image will ever be captured; concerns will be addressed promptly.

8. Publication, publicity and social media

- Only authorised staff may publish through Razzamataz accounts or provide material to the press, venues, sponsors or partners.
- The intended platform and likely audience must be considered before publication. Privacy settings do not remove safeguarding or data-protection responsibilities.
- Captions will not normally include a child's full name, address, school, timetable, precise location or other information that could facilitate identification or contact.
- Geolocation and unnecessary metadata should be removed where practicable. Live location information must not be posted where it could create a risk.
- Comments, tags, sharing and downloads should be limited or moderated where the platform permits.

- A screenshot or copy may persist after deletion; this foreseeable limitation should inform every publication decision.

9. Storage, access, retention and deletion

- Material must be transferred promptly to approved, access-controlled storage and removed from cameras, memory cards or contractor devices when no longer required.
- Access will be limited to people who need it for the authorised purpose. Files must not be copied to personal cloud storage, personal email, messaging apps or removable media unless expressly approved and secured.
- Files should be labelled and organised so that consent restrictions, source, date and permitted uses can be checked.
- Images and recordings will be retained only for the period stated in the relevant privacy information or retention schedule and then securely deleted, unless there is a safeguarding, legal or evidential reason to retain them longer.
- Suspected loss, unauthorised access, disclosure or publication must be reported immediately under the data-breach and safeguarding procedures.

10. Artificial intelligence, synthetic media and biometric technologies

Student photographs, video, voices, names or other personal data must not be uploaded, pasted, submitted or connected to public or consumer generative-AI services by staff, freelancers or volunteers. This includes tools used to generate or edit images, clone voices, create avatars, animate faces, alter bodies or clothing, translate or dub performances, produce face swaps or deepfakes, identify emotions, recognise faces, analyse behaviour, or train or improve an AI model. The prohibition applies even if the output seems harmless or is intended only as a draft.

In particular, no person may:

- create sexualised, humiliating, discriminatory, deceptive or otherwise harmful synthetic content involving a student;

- use AI to remove, replace or simulate clothing, change a student's body or apparent age, or place them in a scene or activity that did not occur;
- use a student's voice or likeness to impersonate them or suggest words, conduct, views or endorsement;
- use facial recognition, emotion recognition or other biometric categorisation without explicit organisational approval and appropriate legal assessment; or
- assume that deleting a prompt or output removes the material from a provider's systems or training data.

Any proposed exceptional AI-supported use must be referred in advance to the Razzamataz Principal and the appropriate central data-protection/safeguarding lead. Approval requires a documented necessity and risk assessment, confirmation of the provider's data handling and security, a suitable lawful basis, age-appropriate transparency, specific and freely given consent where relied upon, contractual controls, human review, limited retention and a clear withdrawal/deletion route. A safer non-AI alternative must be preferred where it can achieve the purpose.

Suspected AI manipulation or misuse must be preserved as evidence without further sharing and reported immediately. Where content may be criminal, sexualised, threatening or part of grooming or exploitation, staff must follow safeguarding procedures and must not investigate or contact the alleged creator themselves.

11. Third-party photographers, videographers and platforms

External providers must be approved, appropriately supervised and given a clear written brief covering safeguarding, permitted shots, consent restrictions, security, ownership, publication, retention, deletion and incident reporting.

They must not use the material for their own portfolio, publicity, stock libraries, model training or any additional purpose unless Razzamataz has expressly authorised this and the relevant individuals have received clear information and provided any required consent.

Razzamataz will carry out proportionate due diligence on online platforms, including access controls, location of processing, onward sharing, retention and whether data may be used to develop AI systems.

Parents and students must not be required to contract directly with a provider without clear explanation of who controls the data and how rights may be exercised.

12. Personal photography by students

Students must follow staff instructions about devices and recording. They must not photograph or record another person without permission, record in private areas, livestream sessions without authorisation, or edit, share or use another student's image, voice or likeness in AI tools.

Harmful or non-consensual content must be reported and managed under the safeguarding, behaviour and online-safety procedures. Staff should avoid forwarding such content and should preserve evidence only as directed.

13. Concerns, complaints and takedown requests

Anyone concerned about an image or recording should contact the Principal . Razzamataz will acknowledge the concern, take proportionate steps to restrict or remove material under its control, preserve evidence where necessary, assess safeguarding and data-protection risks, and inform the person of the outcome where appropriate.

Concerns involving a member of staff must also be considered under the managing-allegations and low-level-concerns procedures. Immediate danger or suspected crime should be reported to the emergency services or police as appropriate.

14. Training, monitoring and review

Relevant staff will receive induction and updates on safe image practice, consent, approved equipment, publication controls, AI-enabled harms and incident reporting. The Principal will periodically sample published content and storage arrangements.

Photography, Video and Media Consent

Child's name: _____

Parent/carer's name: _____

Relationship to child: _____

Please select **Yes** or **No** for each question. Leaving a question unanswered will be treated as no consent. Your choices will not affect your child's access to classes.

Photographs and recordings

1. Do you consent to authorised staff or photographers taking photographs of your child during classes, rehearsals, performances and school events?

☐ Yes ☐ No

2. Do you consent to authorised staff or videographers making video and audio recordings of your child during these activities?

☐ Yes ☐ No

How photographs and recordings may be used

3. May photographs or recordings of your child be used privately within the theatre school for teaching, feedback and reviewing performances?

☐ Yes ☐ No

4. May photographs or recordings featuring your child be shared with participating families through the school's restricted-access platform?

☐ Yes ☐ No

5. May photographs or recordings of your child appear on the theatre school's public website?

☐ Yes ☐ No

6. May photographs or recordings of your child appear on the theatre school's official social media accounts:

☐ Yes ☐ No

7. May photographs of your child be used in printed publicity, such as leaflets, posters, programmes and brochures?

☐ Yes ☐ No

8. May photographs or recordings of your child be used in paid advertising for the theatre school, including online advertising?

☐ Yes ☐ No

Additional permissions

9. From time to time, we may run public performances, such as festivals where we have **no control** over who may be taking photographs or recordings. May your child take part in these public activities?

☐ Yes ☐ No

10. May your child's **first name only** accompany an approved photograph or recording? We will not publish their surname or personal contact details.

☐ Yes ☐ No

10. Would you like us to contact you about any restrictions or circumstances affecting the safe use of your child's image? You do not need to provide sensitive details on this form.

☐ Yes ☐ No

Preferred contact details: _____

11. Have you discussed these choices with your child, where appropriate to their age and understanding? ☐ Yes ☐ No

Please tell us about any preferences your child has regarding photographs or recordings:

Parent/carer declaration

I confirm that I have parental responsibility for this child or am authorised to provide this consent. I have read the school's Photography and Media Policy and privacy notice.

I understand that public images and recordings may be copied or shared by others. I can change or withdraw my consent by contacting [contact details]. The school will stop future uses covered by that consent and explain what can be removed from existing materials.

The school will respect my child's wishes if they do not want to be photographed or recorded, even where I have given permission.

Signature: _____

Date: _____