Farley Coronation Playing Field
Imagery Use Policy

Applicability
This policy applies to all users of the premises, trustees, other volunteers, employees, contractors, and third-party representatives of the charity and applies to all recorded visual imagery, including but not limited to wet film, printed materials, digital images and video. Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

Purpose
This policy outlines the guidelines for the use of images by our charity to ensure ethical and legal compliance, respect for individuals' rights, and the protection of the charity's interests. The use of imagery should fit with and promote our brand guidelines and tone of voice, so that it reinforces and amplifies our values and aims.

Oversight
An individual is to be nominated to provide oversight of imagery to ensure that these guidelines are adhered to, understood by those using it, and imagery is removed from use and deleted in line with these.

Consent
Consent should be obtained, when necessary, informed, compliant and ethical. These issues are explained in the annex. Consent forms must state if images may be used in AI systems (including editing, generation, or training) and describe safeguards in plain English.

Intellectual Property Rights
We have taken appropriate steps to mitigate the risk of inadvertent infringement of copyright and other intellectual property (IP).

- Any imagery taken on behalf of the charity by volunteers or staff remains the property of the charity.
- Volunteers and staff must transfer all rights to the charity upon submission of the images.
- Ensure proper permissions, such as copyright, are obtained before using third-party images.
- Respect copyright laws and give appropriate credit where required.

Manipulation of Imagery
Imagery may be edited, cropped or enhanced to improve the quality or ability to see the imagery. However, it must not be manipulated to the extent that the context or meaning are changed, and it may not be used for memes.

Online Meetings
When an online meeting, event or other activity is to be recorded, those attending are to be made aware of this and invited to switch off their cameras before recording begins.

Farley Coronation Playing Field Imagery Use Policy

Storage

Imagery should be annotated so that the consent, location and date of an image isn't lost. The Alt Text should be completed, using lower case words connected with hyphens. It should be stored under lock and key (if hard copy) and behind a password, if digital.

Retention

Under GDPR, personal data, including images, should not be kept longer than necessary for the purposes for which it was collected. A common practice is to retain personal data for up to six years. The consent form must include the period of retention.

- Imagery for which consent has been withdrawn is to be destroyed immediately.
- In the event an individual in a publicly displayed image dies, or is investigated, charged or found guilty of a serious crime or has behaved or expressed views incompatible with our role and values, imagery may be taken down either temporarily or permanently, or destroyed, as appropriate. This will be considered where there is reasonable likelihood that not doing so may upset an individual's family, or our stakeholders, or damage the charity's reputation.
- In general, where an image is of a short-term campaign or project, the images should be retained for 1 to 3 years after it ends.
- However, where an image may ultimately become of historical value, it may be retained for longer, or even indefinitely.

Ethics

Imagery should portray individuals in the way that they would wish to be portrayed. It must also be accurate so that viewers will not be misled, or take it out of context, either about those in the image or the role of the charity in the context of the image. Imagery should never appear (to a reasonable person) to promote a political party or politician, or anything illegal (such as racism) or which might reasonably offend or harm our stakeholders.

AI-generated images must be accurate (e.g., medical equipment, disability aids, religious dress) and culturally sensitive. AI generated images should be clearly labelled as such, unless these would reasonably be seen as clearly AI generated by an ordinary person.

Use of CCTV and AI

Our policy on the use of AI and also of CCTV is at Annexes A and B respectively below.

Version Control - Approval and Review

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Board	24SEP2026	Initial draft approved	Annually

Farley Coronation Playing Field Imagery Use Policy

Regulatory Guidance

ICO: Consent.
ICO: Installing CCTV? Things you need to do first.
Gov.UK: Attributing images. This is guidance for Government but is quite useful.
Gov.UK: Data protection and CCTV.

Resources

House of Commons Library – AI Content Labelling (Jan 26).
NSPCC: Creating a photo and video policy statement.
KPMG - AI and copyright – what is permitted when using LLMs? - 18 Jan 24.

Annex A – Artificial Intelligence (AI)

We respect the importance of human creativity and artistic expression, and only use AI to complement and enhance this, not replace it.

We are open and transparent when content has been created by AI. AI created content is either self-evident or clearly identified.

It will not be used for purposes where the use of AI has been specifically not permitted. In particular, we will use our best efforts to ensure our use of AI does not infringe copyright.

When we use AI to create images, we will do so responsibly and transparently. Any AI-generated image will be clearly identified as such, and we will check it carefully before use to make sure it is accurate, respectful and suitable for our charity's work.

We avoid uploading high resolution facial images and sensitive data, such as personal information in meta data, that will be publicly accessible (such as social media, and websites) because this may place individuals at increased risk of deepfakes, scams, misinformation or other abuse.

We will avoid creating or sharing images that could misrepresent people, places or events, and we will be culturally sensitive by taking extra care with sensitive subjects such as disability, ethnicity or religion.

There is appropriate content moderation by humans, to minimise the potential for errors and bias/defamatory phrases etc.

Farley Coronation Playing Field Imagery Use Policy

Annex B – Use of CCTV

If we use CCTV, we will register our details with the Information Commissioner's Office (ICO).

We will also;

- Tell people they may be recorded, usually by displaying signs, which must be clearly visible and readable.
- Control who can see the recordings.
- Make sure the system is only used for the purpose it was intended for - for example, if it is set up to detect crime, we would not use it to monitor how much work staff do.

Anyone who asks to see images that we've recorded of them will be provided with the footage free of charge within 1 calendar month of receiving a request in writing.

Annex C – Consent

Informed

In seeking consent, we will ensure that the individual understands:

- Why we want to film/photograph/interview them (for fundraising/ communications/ campaigning purposes etc).
- What the resulting communications will be (advert/publication etc).
- How and where it will be communicated (through what channels/ mediums and to whom).

In addition, GDPR also requires us to let them know:

- How long their image and other personal information will be kept by us.
- That they have a right to withdraw consent for further use, at any time.
- How they can withdraw their consent.

Groups and Crowds

If an individual is recognisable in a crowd shot, whether consent is required or not depends on whether the context of that crowd reveals information about them which is considered personal. You do not require consent from identifiable individuals in the background of an ordinary street or other scene, which does not reveal any personal information. However, the case for an individual outside an HIV testing centre, or at a political rally may well be different.

Competence

Where an individual may not be competent to give consent or under 13 years old, the consent of their parent or guardian is to be obtained.

Not Coercive

Consent must be sought in a manner where the individual understands what they are consenting to, feels no obligation to give consent and understands that they may refuse if they wish to, without offering any explanation or justification. For example, a client may feel obligated to help the charity by agreeing or a child may feel that they should do what an adult appears to be telling them.

Active opt-in

Consent must be an unambiguous indication, which means that it must be either a statement or an affirmative action. Consent must be more than just confirmation that the person has read terms and conditions – there must be a clear signal that they agree. Clear affirmative action means someone must take deliberate action to opt in. This could be through ticking the opt-in box in the consent to use imagery, signing it or you making a record of their oral agreement on the consent form.

Annex D – Drones and other aircraft

The use of drones and other aircraft is strictly prohibited unless per-approved authorisation is obtained from the Trustees and all appropriate legal requirements are fulfilled. The Trust reserves the right to refuse permission without justification. We are aware that irresponsible use of drones has occurred and will revoke access to our premises to anyone found using a drone from our premises without permission.