

Consent Policy, Common Room North Ltd

Last updated: June 2025

We are committed to reviewing and updating our policies every 2 years.

Review due: June 2027

Policy brief & purpose

Common Room works with children, young people, families, and adults at risk as part of its activities. These activities include focus groups, discussions, consultations, training, events, and other research. During these activities Common Room staff may use audio or video recording, take photos and will take notes. These notes, images and recordings may then be used to present information online and offline to commissioners, researchers and the public.

The purpose of this policy statement is to:

- protect children, young people and vulnerable adults who take part in Common Rooms activities, specifically those where photographs, audio and videos may be taken.
- set out the overarching principles that guide our approach to using words, images and videos of children, young people, and vulnerable adults during our activities.
- to ensure that we operate in line with our values and within the law when creating, using, and sharing images and audio of children, young people and vulnerable adults.

This policy statement applies to all staff, volunteers and other adults associated with Common Room.

Legal framework

This policy has been drawn up based on relevant legislation, policy, and guidance that seeks to protect children and adults at risk in England, including but not limited to the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. It should be read alongside Common Rooms Safeguarding and Data Protection Policies and Personal Data Flowchart.

We believe that:

- children, young people, and vulnerable adults should never experience abuse of any kind.
- we have a responsibility to promote the welfare of all children, young people, and vulnerable adults and to take, share and use images and audio of them safely.
- it is important for all participants to understand how their information, words and images may be used by us, and that they have the right to withdraw their consent at any time, understanding that information already shared or published may not be fully retrievable. Participants will have this explained verbally and in writing prior to any activity and be given the opportunity to ask questions and decide if they would like to consent to engage with Common Room.

We recognise that:

- sharing words, photographs and films from our activities can help us provide a record of our engagement and raise awareness of our consultation with participants.
- film or audio content can be an effective way of sharing important messages
- the welfare of the children, young people and vulnerable adults taking part in our activities is paramount.
- all participants and children's parents and carers have a right to decide whether their images or audio are taken and how these may be used, regardless of age, disability, gender identity or reassignment, race, religion or belief, sex or sexual orientation.
- consent to take images or audio of children is only meaningful when participants and children's parents and carers understand how they will be used and stored and are fully aware of the potential risks associated with the use and distribution of these images and audio.
- there are potential risks associated with sharing images and audio online.

We will seek to keep participants safe by:

- always asking for explicit consent from a participant and children's parents or carers before engaging in activities with Common Room.
- always explaining what notes, images and/or recordings will be used for, how they will be stored and what potential risks are associated with sharing recordings.
- making it clear that if a participant or a child's family withdraw consent for words, images or recordings to be shared, it may not be possible to delete those that have already been shared or published.
- using only the first initial and age of children whose words, images and/or recordings are being used in our published material whenever possible (and only using first names if we do need to identify them).
- never publishing personal information about individual participants and disguising any identifying information (for example the name of their school or a school uniform with a logo).
- making sure participants, children's parents and carers understand how images and recordings will be securely stored and for how long (including how we will control access to the images and their associated information)
- regularly reviewing and updating our consent forms to ensure they accurately reflect our activities, data usage, and legal obligations, and providing participants with the most current versions.
- reducing the risk of images being copied and used inappropriately by:
 - only using images of participants in appropriate clothing,
 - using images that positively reflect their involvement in the activity.

Consent:

Participants aged 16 and 17 will be asked to complete the relevant consent form for any Common Room activity they wish to participate in, acknowledging their capacity to provide consent for themselves. Where participants are below the age of 16, we will seek parent/carers consent for all activities they wish to participate in, in relation to Common Room work. In cases where participants are under 18 (including those aged 16 and 17) but the activity is judged particularly sensitive or has considerable potential implications for the

young person, Common Room may, on an individual basis, also seek to get parent/carer consent. Verbal consent will also be sought from all under 16s to participate in any activity prior to commencement.

All online consent forms will outline the purpose of the activity, how the materials will be used and include any plans for use online, highlighting any implications from this. We will ensure that online consent forms are hosted on secure platforms and data submitted through them is encrypted to protect privacy.

Photography and/or filming for Common Room's use

We recognise that our staff may use photography and filming as an aid in recording activities such as focus groups or interviews.

Children, young people, parents and carers and vulnerable adults must be made aware that photography and filming is part of the activity and give formal consent.

If we hire a photographer for one of our events, we will seek to keep children, young people, and vulnerable adults safe by:

- providing the photographer with a clear brief about appropriate content and behaviour.
- always ensuring the photographer wears identification.
- informing participants and children's parents and carers that a photographer will be at the activity and ensuring they give explicit consent to their images being taken and shared.
- not allowing the photographer to have unsupervised access to children.
- not allowing the photographer to carry out sessions outside the activity.
- reporting concerns regarding inappropriate or intrusive photography following our child protection procedures.

If consent to take photographs/video/audio is not given

If participants or children's parents and/or carers do not consent to photographs or recordings being taken, we will respect their wishes. We will agree in advance how they would like to be identified so the photographer knows not to take recordings or images of them and ensure this is done in a way that does not single out the participant or make them feel isolated. We will never exclude a participant from an activity because we do not have consent to take their photograph / recording.

Storing images/recordings

We will store photographs and recordings of children securely, in accordance with our safeguarding policy and data protection law.

We will keep hard copies of images in a locked drawer and electronic images in a protected folder with restricted access. Images will be stored and potentially used for a period of 5 years. After this period, they will be securely deleted from electronic files or destroyed (for hard copies) in a manner that prevents recovery. However, images that have already been shared or published will still be available but not reproduced.

The Director will review all stored images and recordings on a 6-monthly basis and remove any that have been on file for 5 years. The only situation where these would not be removed would be if requested for safeguarding investigations. Final versions of films and audio may be kept on file to be used internally for reference only in the development of new resources, and will not be publicly disseminated beyond the initial consent period.

Images of participants where they are not identifiable (e.g., images of feet or hands) may be used for an undefined period and will not be removed after 5 years unless explicitly requested by the subject.

We will never store images of participants on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

Common Room staff may use personal equipment to take photos and recordings of participants, only with express permission from the Director or a senior manager. These images should be securely uploaded and removed from the device immediately once the activity has ended.

Activities covered by this policy:

- **Note taking** – this includes taking notes of interviews, focus groups and conversations with participants where their words will be recorded verbatim and potentially used in materials and reports on and offline. At times these conversations may be recorded as an audio or video recording for the purpose of assisting with note taking. Participants will be informed of the purpose of the notes and where they will be shared and the implications of this for them. Participants retain the right to withdraw consent for future use of their notes, though it may not be possible to recall notes already shared or published. Once the notes have been made the recordings will be archived for a period of up to 5 years, when they will then be deleted.
- **Audio recording** – This includes recording audio to capture conversations, interviews, or discussions with participants. These recordings may be used for notes, sharing directly with commissioners, or sharing with the public online and offline (e.g., podcasts). Participants will be informed of the purpose of the recording and where it will be shared and the implications of this for them. Participants retain the right to withdraw consent for future use of their recordings, though it may not be possible to recall recordings already shared or published. Recordings will cease to be used after a period of up to 5 years without express further consent being sought from the participants after the initial 5-year period. However, recordings that have already been shared or published will still be available but not reproduced. Final versions of audio may be kept on file to be used internally for reference only in the development of new resources, and will not be publicly disseminated beyond the initial consent period.
- **Digital Images** – This includes taking photographs of participants to document their involvement in projects. It may also include taking images for promotional and business materials. Participants will be informed of the purpose of the recording and

where it will be shared and the implications of this for them. Participants retain the right to withdraw consent for future use of their images, though it may not be possible to recall images already shared or published. Images in which participants can be identified will be deleted after a period of up to 5 years. However, images that have already been shared or published will still be available but not reproduced. Those where the participants are not identifiable (e.g., images of hands, feet, legs) will be kept and used indefinitely unless explicitly requested to be deleted by any featured participant.

- **Film** – This includes the recording of videos of participants to document their involvement in projects or to create informative or promotional videos (e.g., vlogs or service information videos). Participants will be informed of the purpose of the recording and where it will be shared and the implications of this for them. Participants retain the right to withdraw consent for future use of their videos, though it may not be possible to recall videos already shared or published. Videos will cease to be used after a period of up to 5 years without express further consent being sought from the participants after the initial 5-year period. However, videos that have already been shared or published will still be available but not reproduced. Final versions of films may be kept on file to be used internally for reference only in the development of new resources, and will not be publicly disseminated beyond the initial consent period.

Arrangements for regular groups

Where Common Room is to meet with a group of participants on a regular basis over an extended period (e.g. monthly meetings for 4+ months) Terms of Reference may be used as well as consent forms. Any young people under the age of 16 will still need parental/carers consent to participate. Terms of Reference will set out:

- The purpose and objectives of the group
- How it will be coordinated and by whom
- Membership criteria
- Responsibilities of group members and coordinators/facilitators
- Guiding principles
- Confidentiality and safeguarding
- Frequency and format of meetings
- Reporting arrangements
- Reimbursement
- Visitors' arrangements
- Evaluation
- Procedure for complaints
- Code of conduct for online meetings (if appropriate)

See Terms of Reference Template (available on request)

Participants will be asked to agree to this in a meeting and it will be recorded in the notes that they agreed. The notes will then be shared with group members to approve. The Terms of Reference will be reviewed periodically with the group to ensure their continued relevance and effectiveness.

If any additional activities take place in the group that may require specific consent this must be sought (using the relevant form) in addition, e.g., video or audio recording.

Related Common Room Documents

- Common Room Consent Form Template 2025
- Safeguarding Policy
- Confidentiality Statement
- Data Protection Policy
- Data Retention Schedule
- Personal Data Flowchart