Ormiston Academies Trust

Photography and video policy

Policy version control

Policy type	Mandatory
Author In consultation with	Alex Coughlan, Data Protection Officer, and Complaints Manager Kerry Barry, Marketing and Communications Manager
Approved by	National Leadership Group (NLG), July 2026
Release date	July 2026
Review	July 2027
Description of changes	Updated to reflect narrower consent categories

Contents

1. Purpose and scope of this policy 3
2. Legal framework 3
3. Lawful basis for processing 3
4. Types of photography and video 4
5. Consent arrangements 4
6. Safeguarding considerations 5
7. Storage, security and retention 5
8. Third-party photographers and videographers 5
9. Parental/carer photography at events 6
10. Complaints and queries 6
11. Monitoring and review 6
12. Academy-owned devices 6

1. Purpose and scope of this policy

1.1. In this policy, **Trust** refers collectively to Ormiston Trust (OT), Ormiston Academies Trust (OAT), Ormiston Teacher Training (OTT), and the Ormiston Academies Trust network of schools.

1.2. This policy explains how the Trust, including schools, use photography and video to support education, celebrate achievement and promote school life, while safeguarding pupils and ensuring compliance with data protection law.

1.3. Photographs and videos of pupils constitute personal data under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The Trust is committed to using images responsibly, lawfully and transparently.

1.4. This policy applies to:

- All pupils attending schools within Ormiston Academies Trust
- All staff, governors, volunteers and contractors/suppliers within the Trust
- All forms of photography and video, including still images, video recordings and livestreaming processed by the Trust

2. Legal framework

2.1. This policy has due regard to legislation, including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010
- Keeping Children Safe in Education (DfE statutory guidance)
- ICO guidance on the use of children's images

2.2. This policy also has due regard to the academy policies, including, but not limited to, the following:

- Safeguarding and Child Protection and policy
- Special Educational Needs and Disabilities (SEND) policy
- Behaviour policy
- Data Protection and Freedom of Information policy

3. Lawful basis for processing

3.1. The Trust processes photographs and videos of pupils on the basis of **consent**, where images are taken and used for routine educational, communication, and promotional purposes connected with the Trust's functions and activities.

3.2. Separate consent will be sought when using images for any purpose not covered by the consent form.

4. Types of photography and video

4.1. Educational and internal use

4.1.1. This may include:

- Classroom activities and assessment evidence
- Displays within the academy
- Internal communications and learning platforms
- Staff training and professional development

4.2. External and promotional use

4.2.1. Photograph and video descriptions may occasionally use the first name of pupils on public platforms. This may include:

- School and Trust websites
- Official Trust and academy social media channels
- Recruitment and promotional materials
- Trust publications and reports
- Group photos which are available to purchase by parents/carers/other families eg choir, orchestra etc

5. Consent arrangements

5.1. The Trust operates a **consent policy** for photography and video.

5.2. Children in year 8 and above are normally considered to have the capacity to make their own decisions about what happens with their personal data, including use of photographs. There will be some exceptions to this and where there are concerns that a child would not have the capacity to make their own decisions this would revert back to the parents/carers. Parents and carers (or children in year 8 and above) who wish for their child to appear in photographs or videos must notify the school in writing.

5.3. Consent records:

- Are recorded securely on the schools Managed Information System (MIS), Arbor. Reminders to review and update consent will be sent on an annual basis
- Can be updated or withdrawn at any time
- Are reviewed regularly

5.4. Schools will take all reasonable steps to ensure that pupils who have not provided consent are not included in photography or video. However, it may not always be possible to exclude pupils from large group activities such as performances, assemblies or sporting events, in these situations we will endeavour to take group shots from a distance or low resolution.

5.5. No pupil will be excluded from activities or disadvantaged as a result of refusing to provide consent.

6. Safeguarding considerations

6.1. All photography and video will be undertaken in line with the Trust's Safeguarding and Child Protection Policy.

6.2. Particular care will be taken for pupils who:

- Are Looked After or previously Looked After
- Are adopted
- Are subject to court orders
- Have safeguarding or security concerns

6.3. The Designated Safeguarding Lead (DSL) will advise on any additional restrictions required. In some cases, photography or video may be prohibited entirely for individual pupils.

6.4. Any safeguarding concerns must be reported immediately in line with Trust procedures.

7. Storage, security and retention

7.1. Photographs and videos will be:

- Stored securely on Trust-approved systems (Managed Information System (MIS) – Arbor)
- Accessible only to authorised staff
- Retained only for as long as necessary

7.2. Images will not be shared with third parties without appropriate safeguards.

7.3. Where consent is withdrawn, reasonable steps will be taken to remove images from future use. It may not be possible to remove images already published externally.

8. Third-party photographers and videographers

8.1. Any third-party provider must:

- Be appropriately vetted (enhanced DBS) and wear identification throughout visit
- Work under a written contract compliant with data protection law
- Use images only for the agreed purpose

8.2. Third parties may not reuse images or footage without explicit permission from the Trust.

9. Parental/carer photography at events

9.1. Parents and carers may take photographs or videos at school events for **personal use only**.

9.2. They must not:

- Publish images of other children on social media
- Use images for commercial purposes

9.3. Schools may issue reminders at events and reserve the right to restrict photography where safeguarding concerns arise.

10. Complaints and queries

10.1. Concerns about the use of photography or video should be raised with the school in the first instance or directed to the Trust's Data Protection Officer (DPO).

11. Monitoring and review

11.1. This policy will be reviewed on an annual basis by the Trust, the principal and the DPO. The next scheduled review date for this policy is shown on the front cover.

11.2. Any changes to this policy will be communicated to all staff members and, where appropriate, parents/carers.

11.3. **Note:** Additional consent forms will be issued where we would like to retain photographs for use in year books.

12. Academy-owned devices

- Staff are encouraged to take photographs and videos of pupils using academy equipment; however, they may use other equipment, such as academy-owned mobile devices, where the DPO (and academy DPL) has been consulted and consent has been sought from the principal prior to the activity.
- Where academy-owned devices are used, photographs and videos will be provided to the academy at the earliest opportunity and removed from any other devices.
- Staff should not use their personal mobile phones, or any other personal device, to take photographs or videos of pupils. Their own personal devices should only be used in exceptional circumstances and special permission will need to be granted by the principal or DSL. After which, photographs and videos should be removed immediately and/or stored securely on the academy network (in photography files) for further use.
- Photographs and videos taken by staff members on academy trips/visits may be used for educational purposes, e.g. on displays or to illustrate the work of the school, social media, website and for press releases that may be used across local, regional or national media, where consent has been obtained.
- Digital photographs and videos will be held on an appropriate secure academy data management system and are accessible to staff only, as well as photographs and videos shared with OAT, and

are all stored on secure servers. Photographs and videos are stored in labelled files, annotated with the date, and are only identifiable by year group/class number - no names are associated with photographs and videos. Files will be secured appropriately, and only relevant staff members have access to view and edit photographs.