

Use of Images Policy

Hampton Academies Trust



Policy last reviewed:	September 2025
Next review due:	September 2026
Member of staff responsible:	Miss Emily Culpin
Ratified by:	Trust Board

Statement of Intent

This Policy details the rules governing photography and recording videos at Hampton Academies Trust (HAT) (including all the Trust's associated schools), the distribution of these photos & videos, and their publication.

Taking photographs and video images of children's achievements and activities is a wonderful way of capturing a memory and promoting successes. This policy document explains, in detail, the Trust's requirement to obtain parental permission, while taking such images and the safeguards in place to ensure anonymity in their usage.

Typical Uses of Photographs/ Videos at Hampton Academies Trust:

- A photograph of your child will be taken for the purposes of identification on our school information management system
- For assessment purposes
- Learning skills and feedback
- Performing arts including dance and movement, concerts, drama performances, community events, assemblies
- Sports days and sports fixtures
- Trips & visits
- Media, including press and television
- Displays in the school of children's activities
- Staff training and professional development activities
- School newsletter and curriculum news
- Publicity through the prospectus & school website
- Publicity through Facebook, Twitter, Instagram, or YouTube (where applicable)
- Local press

Good Practice in Using Photographic Images:

- Images are used only for their intended purposes
- In activities such as dance and gymnastics, the content of the photograph will focus on the activity and not on a particular child
- Staff are only permitted to use school equipment for photography/ video recording only (no use of personal devices)
- Images will be stored securely and used only by those authorised to do so
- Photographs of children who have left the school will not be reused without additional consent and prior agreement
- Ensure file names given to electronic images of children do not identify the child e.g. not Mary Jones.jpg
- First names of children and their image is used on the Class Dojo app which complies with the Children's Online Privacy Protection Act and personal details and images are securely stored on the schools MIS system.
- Use photographs that represent the diversity of the young people participating
- Report any concerns relating to any inappropriate or intrusive photography to the Executive Headteacher & GDPR Officer
- No images of the children will be used in any way without prior consent

The decision on whether to give consent or not is requested via your child's school admission forms and will remain valid for your child's time at schools within the Trust, unless you notify the school to the contrary. You can change any of these consents at any time, either in writing, by submitting a new consent form or by updating parental consent on My Child At School. Responses to the use of images consent forms are collated and all staff are made aware of the results.

Permissions required for images used for:

- School publications e.g. the school newsletter
- School website
- Displays around the school
- Marketing material e.g. the school prospectus
- Social media for positive and celebratory events, including:
 - Facebook
 - X
 - Instagram
 - LinkedIn
- Local media (newspapers and television) to publicise school events and activities

Permissions required for videos used for:

- School website
- Social media for positive and celebratory events, including:
 - Facebook
 - X
 - Instagram
 - LinkedIn
- Local media (newspapers and television) to publicise school events and activities

School Website and Social Media Safeguarding

Any material published to the School Website or on Social Media platforms will be assessed to ensure it meets the following safeguarding rules:

1. It must not feature any child whose parent/ carer has not given consent
2. It must not in any way embarrass the school, children or staff involved
3. Photos & videos intended for the school website should be taken either by member of staff, or another person (typically a governor or volunteer) authorised by the Head of School or Marketing Lead
4. No image of a child subject to a court order, or a vulnerable child, will be used
5. Images that are likely to cause distress, upset or embarrassment will not be used
6. Only images of children suitably dressed will be used

Photography of children by parents

Parents, carers and family members are invited into HAT schools for assemblies, performances, sports days and community events. Parents are not covered by the General Data Protection Regulation if they are taking photographs or making a video recording of their own child for private use. Parents are therefore permitted to take photographs or make video recordings of their own child only, at those events where it is deemed appropriate by individual schools. Parents will be advised of protocols at the start of each event.

Parents are not permitted, however, to take photographs or to make a video recording of any other child.

Photography of Staff

Photographs and video images of staff are classed as personal data under the terms of the General Data Protection Regulation. Therefore, using such images will require the consent of the staff member concerned. Parents are not permitted to photograph/ film members of staff at Hampton Academies Trust without consent.

The storage and retention of photography

Any digital images taken will be securely stored on the school network. All digital devices will be cleared of images on an annual basis. Any digital photography stored on the school network will be saved until the cohort of children leave school.

Printed photography must be maintained securely for authorised school use only and disposed of either by return to the child, families, or shredding as appropriate.

Official School Photographs

At HAT, we invite an official photographer into school to take portraits/ photographs of individual children and/ or siblings. We undertake a risk assessment in terms of the validity of the photographer/ agency involved and establish what checks/ vetting has been undertaken (DBS). A contract with the photographer is in place that outlines the retention period of the photography taken. Levels of supervision are appropriate to safeguard the welfare of children at all times when visitors are present on the school site.

Legal and Statutory Compliance

This policy reflects current statutory guidance including:

- The Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- The Data Use and Access Act 2025
- Guidance from the Information Commissioner's Office (ICO) and the Department for Education (DfE)

Schools must document the lawful basis for processing images, such as consent or legitimate interest. Pupils and/or guardians must be informed how images will be used, stored, and shared.

Right to Withdraw Consent

Parents/carers and pupils (where age-appropriate) have the right to withdraw consent at any time. Schools must ensure this process is accessible and clearly communicated.

Image Retention and Review

All stored images will be reviewed annually. Unused or outdated images will be securely deleted in line with the Trust's data retention schedule.

Social Media and Personal Use

Parents may take photos for personal use at school events. However, public sharing (e.g. on open social media accounts) falls under data protection law. HAT schools clearly communicate expectations around photography at events and designate areas where photography is permitted.

Supporting Documentation and Guidance:

