Date: May 2024
Review Date: August 2026
Responsibility: Head of Prep School

PHOTOGRAPHY & FILMING POLICY - PREP SCHOOL

1. Aims of Policy

Epsom College in Malaysia Prep School ("ECiM Prep") takes the safety and privacy of children and young people extremely seriously, as a matter of both legal and moral importance. This policy aims to minimise the risk of inappropriate use of photographing and filming of children. All staff will be familiarised with the provisions contained within this policy as part of their induction and be expected to act in accordance with them at all times.

2. Parental Consent

In compliance with Data Protection laws, consent is obtained from parents before the school publishes any photographs or films of pupils, whether for marketing purposes or as a record of achievement. This consent is obtained upon joining the school as part of the Admissions process.

Should parents not give permission for their child's photograph/film to be published the school will respect this decision and ensure they do not place such photos on the school website/social media sites nor any other publication.

Parents retain the right to withdraw consent at any stage, but they must do so in writing. If a photograph or film is published and then consent is withdrawn by a parent then the College will stop using the image as soon as possible. In many cases this will be straightforward but for some types of publication this may take more time.

3. Use of Photography/Filming by staff

Children have their photographs taken to provide evidence of their achievements for developmental records throughout their time at the school; this may include during lessons, celebration assemblies or whilst participating in sporting fixtures, concerts, plays, trips or special events. At such times staff are expected to adhere to the following procedures:

- Photographs/films taken of children by teachers should be part of planned activities and should be taken with school cameras only and not on a personal mobile telephone.

- Personal devices should only be used in exceptional circumstances. An example of this may be if a photograph or film is needed as evidence for a safeguarding reason or there is an emergency on a trip. They should inform the Head of Prep School that such photographs/films were taken and that they have since been deleted after they have served their purpose.

- School cameras/phones must not leave the premises, except for use on a school trip by a member of staff attending the trip. Photos are to be printed in school by staff and images are then to be removed from the camera's memory.

- Staff will not send or show photographs of pupils to a third party.

- Staff will adhere to safeguarding rules on the use of cameras in prohibited areas (e.g. toilets/changing rooms) and be mindful of the need for pupils to be appropriately dressed to maintain modesty.

4. Child Protection / Safeguarding

Staff must be mindful of possible safeguarding issues when taking and using photographs and films of pupils. This means adherence to the following procedures:

- In the event a member of staff has a concern about an image of a pupil being published due to an ongoing issue, they should consult with the Head of Prep School and/or Designated Safeguarding Officer.

- Staff must raise any concerns about the welfare of a child in accordance with the procedures in the College's Child Protection policy. For example, concerns should be reported if they become aware of anyone:

  a) taking an unusually large number of images of a child/children who is not their own;
  b) taking images in an inappropriate setting (e.g. toilet, changing room) or wearing inappropriate dress; or
  c) taking images of children in secret who are apparently unaware that they are being photographed/filmed.

- To ensure the identity of pupils is protected, images and details of pupils should not be published together. For example, if the pupil is named, staff should avoid using their photograph. If the photograph is used, staff should avoid naming the pupil.

- Where possible, general shots of classrooms or group activities involving more than one child are to be used rather than close-up pictures of individual children. Staff must also be careful to consider the camera angle at which pictures are taken in order to make children less identifiable.

5. **Publishing of Photographs/Films by the school**

On occasion ECiM might wish to use photographs/films of the children taking part in an activity to advertise/promote the school via our website or in promotional literature and social media. In such cases the school will adhere to the following procedures:

- Should the school have need to take and use photos of children for marketing/information purposes, every attempt will be made to be representative of the group – for example, including where relevant images of children from different ethnic backgrounds.

- The school is aware that there may be pupils at the College whose images cannot be used under any circumstances. This may be relevant if, for example, the pupil had famous parents or if there was a risk they might be abducted if their presence at the College was known.

- Similarly there may be an ongoing safeguarding concern about a pupil which may prevent the image of a child being published; in such an event the school's Designated Safeguarding Officer will inform the Admissions & Marketing Department of any pupils whose images should not be used for safeguarding reasons.

- The Admissions & Marketing Department keep a list of all children where consent for the publication of images has not been given by parents and this is circulated to staff annually. Staff must ensure they do not publish any images of these pupils.

Parents may contact the Head of Prep School to discuss any concerns regarding the use of images of their child(ren).

6. **The Storage of Photographs**

Photographs/films of pupils are maintained for authorised school setting use only and disposed of either by deleting from memory, returning to the child/parents, or shredding as appropriate. No images should be removed from school computers and taken home. If permission is withdrawn for a photograph it is edited from the school storage immediately.

7. Parental right to take Photographs and Films

Parents are asked to be aware of the following expectations in taking photographs/films of children at school (including their own and those of other pupils):

- Parents are not covered by Data Protection legislation if they are taking photographs or making a film recording for their own private use and are therefore at liberty to take photographs or make film recordings at school events, such as plays, concerts and sports days.

- Parents are not permitted to take photographs or to make film recordings for anything other than their own personal use (e.g. with a view to selling films of a school event). Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film.

- However, parents are only permitted to take or make recording within the designated areas of the event and in full view of all attending in compliance with wider school policy. Taking photographs of children in a lesson without the prior agreement of the class teacher, would not therefore be deemed acceptable.

- Parents and guardians who are using photographic equipment must be mindful of others when making and taking images and adhere to the guidelines as set out below for anyone photographing/filming children at the school.

- The right to withdraw consent will be maintained and any photography or filming on site will be open to scrutiny at any time. The school reserves the right to request that parents/guardians do not take photographs/films at certain times on health and safety grounds.

- Parents, guardians or visitors who suspect anyone of taking images of children without consent must report the incident to the Head of Prep School immediately.

8. Taking photographs and films - important guidance for staff, parents and visitors

It is important that anyone photographing/filming (including live streaming) children in school are aware that they must not film/photograph anything which:

- might cause embarrassment or distress;
- is associated with distressing or sensitive issues;
- is taken during a one-to-one situation; or
- is unnecessarily intrusive in nature.

In addition:

- Photography/filming is not permitted in sensitive areas such as changing rooms, toilets, swimming pool areas etc.

- Children must always be appropriately dressed when being photographed/filmed. This means that swimming pool attire may not be appropriate unless the children are wearing rash vests/shorts.

- Pupils are aware that they will often be photographed at celebration events, sports days and when performing in concerts/plays etc. However, care must be taken not to take images of pupils who are unaware that they are being photographed or filmed at other times.

9. Official School Photographs

There may be situations where a third party takes photographs or films of pupils. This should only happen with the consent of the Head of Prep School and when there is staff supervision. For example:

a) the College might hire a professional school photographer to take official College photographs or to film a play;

b) a company may be used by the College to provide extra-curricular activities and ask to use photographs of our pupils for advertising purposes (with prior parental agreement); or

c) a photographer from a media outlet might attend an event at the College.

In all cases noted above, invited photographers will be chaperoned by a member of staff during their time on the school premises.