

No. 23 **Use of Recording Devices Policy**

1. STATEMENT OF INTENT

It is our intention to provide an environment in which children, parents and staff are safe from images being recorded and used in an inappropriate way. In so doing, we aim to avoid the potential

- a) for unauthorised images to be taken in our pre-school setting
- b) for images taken in our pre-school setting to be used in a way which is not in accordance with this policy and with the stated privacy requirements made by the families of individual children through the registration forms
- c) for images taken in our pre-school setting or stored by the pre-school to be copied or removed without authorisation
- d) for staff and children to be distracted during a session by the inappropriate use of recording devices

2. AIM

Our aim is to have a clear policy on the acceptable use of all recording devices that is understood and adhered to by all parties concerned without exception.

3. DEFINITIONS

In this policy,

- 'image' means any photograph, or audio or visual recording
- 'staff' or 'member of staff' means any member of staff or volunteer with appropriate background clearance e.g. but not limited to DBS check
- 'device' means any mobile phone, camera or other item of recording equipment
- 'pre-school session' or 'setting' also means our Forest School/Woodland adventure sessions plus any event run exclusively by the pre-school whether at the Pavilion or in another location. The pre-school has no control over the use of devices by members of the public at public events in which the pre-school is involved.
- 'bathroom' means any area of the pre-school or other location which is used for toileting, including but not limited to the toilet area at Forest School and the nappy changing area.

4. THE IMPORTANCE OF IMAGES

Parents give permission for photographs to be taken when they complete their child's registration form; they have the option to limit the use of the images to their child's learning journey or to give wider permission for the images to be used in marketing materials or on our social media platforms.

Images taken of a child or group of children participating in activities or celebrating their achievements is an effective form of recording their progression in the Early Years Foundation Stage. It is also a vital tool in enabling the pre-school to share children's moments of delight or special activities with the families of the pre-schoolers, their friends and the wider local community. However, it is essential that images are taken, stored and used appropriately to safeguard the children and staff within the pre-school environment. See GEP Data retention, storage and disposal procedure.

5. THE PRE-SCHOOL'S DEVICES

The following procedure applies to the pre-school's own recording devices, namely the camera(s) and mobile phone(s):

- The pre-school mobile phone(s) must be switched on and with a member of pre-school staff during all session times and group outings.

- If the pre-school mobile phone is temporarily unavailable, the Supervisor may use their personal device.
- The Supervisor is the only person allowed to take any pre-school device off the premises apart from during forest school sessions or pre-school outings, when this permission extends to any member of staff who has the authorisation of the Supervisor.
- During group outings the pre-school mobile phone(s) will be available to staff members.
- All staff are responsible for the location of our devices; they should be placed within the lockable cabinet when not in use and at the end of every session, except when being removed from the setting by the Supervisor. Mobile phone(s) should be kept within the lockable cabinet outside of pre-school sessions: this is to ensure that the mobile phone(s) can be used by pre-school staff in the event of the Supervisor's absence. Under exceptional circumstances (for example a group outing the following day), the mobile phone(s) can be taken home by the Supervisor or trip leader.
- If the Supervisor leaves the pre-school setting during the course of a session, they must leave the pre-school mobile phone(s) with the person in charge during their absence.
- Images taken and stored on the camera(s) must be downloaded as soon as possible, ideally once a week. These are downloaded to the pre-school laptop.
- With the express permission of the Management team, staff and designated committee members are permitted to hold selected images taken in the pre-school setting on their personal devices in order to produce marketing documentation, provided these are password-protected.
- With the express permission of the Management team, staff members and volunteers currently undertaking a qualification are permitted to download selected images to their personal device. The Supervisor will oversee the process and the images selected will have parental consent.
- Images may be downloaded to the preschool laptop by any member of staff.
- If a member of staff leaves or a Committee Member resigns, they are required to remove all copies of images taken in the pre-school setting from their personal computers or devices.

6. OTHER DEVICES

Only the designated pre-school devices are to be used within the setting, during pre-school events or on outings, with the following exceptions:

- To ensure the safety and welfare of all the children within our care, we prohibit the use of mobile phones in setting. This policy is also to protect our staff members against possible allegations.
- The pre-school allows staff to bring in mobile phones and devices for their own use subject to the following restrictions:
 - The pre-school does not allow a member of staff to contact a current pupil or parent/carer using their personal device, with the exception of the Supervisor (whose device acts as a back-up if the pre-school phone has lost signal/charge), or to use the device to record images.
 - No personal numbers and contact details to be given out.
 - All staff (with the exception of the Supervisor) must ensure that their devices are left on the windowsill in the kitchen or placed in the top pocket of rucksack on outings
 - Members of staff can and should be contacted on the pre-school phone in case of emergencies – staff therefore have a responsibility to pass the pre-school phone number to relevant parties, e.g. schools and partners. Staff should ensure that they give the Supervisor up-to-date emergency contact information and inform the Supervisor of any changes.
 - If staff have a personal emergency they are free to use the setting's phone or make a personal call from their mobile outside of the premises (for woodland sessions outside would mean the staff member had moved away from the group to ensure conversation could not be overheard).
 - IF this is not possible for whatever reason, and they are required to keep their mobile phone on and "to hand", prior permission must be sought from the Supervisor.

- Other devices such as smart watches/fitbits can be a distraction to staff while working. Staff are advised that these devices may be used as a watch and all other functions should be disabled.
- Visitors are permitted to keep their mobile phone on their person when in pre-school. However, they are requested to keep it on silent; to store it out of sight and make or receive any calls outside if needed (for woodland sessions outside would mean the visitor had moved away from the group to ensure conversation could not be overheard).
- Only visitors who are parents or carers are permitted to make recordings or take images whilst at pre-school sessions or events. These images must be for personal use only, including a private social media account viewable only by family and friends. Parents publishing photos on a public account should check on the ICO website to ensure they are aware of their obligations under data protection law.
- Users bringing personal devices into setting must ensure there is no inappropriate or illegal content on the device.
- By special prior arrangement with the Supervisor, photographers are on occasion invited to do photo shoots or record images for special events or other specific reasons. They are supervised by an appropriate staff member at all times and the images are used in accordance with this policy and with the stated privacy requirements made by the families of individual children through the registration forms.
- Any images must be deemed suitable by the Supervisor prior to publication without putting the child/children in any compromising positions that could cause embarrassment or distress.

7. COVERT RECORDING

Under no circumstances is any person allowed to record images covertly during a pre-school session or event.

8. USE OF IMAGES

When images are used for the following:

- Pre-school's website/Social Media pages;
- newsletters or articles published in local press;
- marketing materials

care will be taken that children's names are not directly associated with their image.

9. USE OF DEVICES IN BATHROOMS

The following procedures apply to the use of recording devices in bathrooms at pre-school or at any event run solely by the pre-school which is not at the Pavilion.

- Under no circumstances must devices of any kind be taken into the bathrooms.
- If photographs need to be taken in a bathroom, i.e. photographs of the children washing their hands, then the Supervisor must be asked first and the person taking the image be supervised whilst carrying out this kind of activity. At all times the camera must be placed in a prominent place where it can be seen.

10. REPORTING CONCERNS

- It is the responsibility of all members of staff to be vigilant and report any concerns to the Supervisor or the Chair (if the concern involves the Supervisor).
- Concerns will be taken seriously, logged and investigated appropriately.
- The Management team reserve the right to check the image contents of a member of staffs mobile phone should there be any cause for concern over the appropriate use of it.

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- Should inappropriate material be found then Starting Point (telephone number 01629 533190) will be contacted immediately. We will follow the guidance of the DDSCP as to the appropriate steps to take.
- Failure by any member of staff to adhere to the contents of this policy will lead to disciplinary procedures being followed.
- Failure by a committee member to adhere to the contents of this policy will lead to immediate dismissal from the committee, procedures outlined within GEP's constitution will be followed.

This policy should be read in conjunction with:

- 024 GEP Social Media Policy
- 031 GEP Information sharing policy
- 032 GEP Confidentiality and client access policy
- 033 GEP Data retention, storage and disposal policy
- GEP Privacy notices

This procedure was adopted at a meeting of Grindleford and Eyam Playgroup

Held on:

Date to be reviewed:

Signed on behalf of the committee:

Name of signatory:

Role of signatory:

All staff members and committee members will sign to indicate they have read, understood and agreed with the above policy.