

## 32: Electronic Devices including Photography, Mobile Phones and Tablets

**Our club takes the safety 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 photos 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.**

In accordance with our duties under the General Data Protection Regulations (GDPR), the club strictly prohibits the use of any photographic equipment (cameras, camcorders, mobile phones or any other medium used to take still or moving images) by staff, parents or visitors on its premises without the consent of the manager and, as a photo of a child is personal data according to GDPR, formal written parental consent.

The club will not use the personal details or full name (first name and/or surname) of any child in a photographic image on its website or in any other printed material without consent. Generally, photos of children will not have an accompanying name in the text or a photo caption; if a name is used in the text, the club will not use a photograph of that individual unless specific permission has been granted. No photographs of children will be released to press or media contacts without the relevant written parental consent.

Parents/staff or visitors who suspect anyone of taking images without consent must report the incident immediately to the manager or in their absence a senior member of staff.

One of the key ways that staff support children's development and engage parents in children's learning is through photographs that record their activities and achievements. Still and moving images (i.e. photographs and video footage) of children will only be taken by staff using only the club's photographic equipment and only following formal written parent/carer consent. This policy also applies to trips and outings.

Should the club have a need to take and use photos of children for marketing/information purposes such as in the prospectus or on the website, every attempt will be made to be representative of the group – for example, including where relevant images of children from different ethnic backgrounds and positive images of children with disabilities. Wherever possible, the club will use alternatives, for example, children's drawings instead of photographs of children.

Storage and security of these images will comply with GDPR and is detailed in policy 31 Documentation and Information Policy.

Staff are strictly prohibited from using personal electronic devices for the purpose of capturing still or moving images, at any time during work hours (both onsite or during trips/outings).

### **Procedures**

All personal mobile phones and cameras belonging to staff or visitors will be kept locked in an area designated by the club's manager.



Staff may use work mobile phones at appropriate times and these should be stored securely.

Mobile phone calls may only be taken within staff breaks with the consent of the manager.

If a personal emergency should occur, staff must only use the club's phone or make a personal call from their mobile phone in an area designated by the manager.

For parent/carers and visitors; if calls must be taken, parents/carers and visitors must return calls away from children who are not their own. Parents/Carers and visitors are not permitted to take images of children (including their own) or the setting.

During outings staff will only have access to the club's mobile phone.

All staff should read this policy in conjunction with the club's 'Social Media' policy.

T-Club-6 Ltd firmly believes that a child of primary age does not require access and use of a mobile phone, particularly one with Internet availability. However, it does recognise that in some circumstances parents may wish their child to bring one to club and for this reason have adopted the school's policy detailed in Policy 32a Application for Mobile Phone Use.

Where permission has not be given the club will confiscate phones if seen. They will then be returned to the parent at collection time.