



File: <b>Staff</b>	Date: <b>11.2021</b>
Initials: <b>CD</b>	
Pages: 4	
Review: <b>CD</b>	Date: <b>11.2022</b>

## **MOBILE PHONE, CAMERA and CCTV POLICY** **November 2021**

### **Mobile Phone Policy**

#### **Aims**

- To protect children from harm by ensuring the appropriate management and use of mobile phones by everyone who comes into contact with children at Victoria Community School.

#### **Procedures**

- To minimise any risks, all personal mobiles must not be used where children are present. This applies to shared use of rooms where non-setting staff may be present at the start of the session, for example an out of school club using a classroom with teaching staff present.
- Procedures must be put into place that will ensure safe and secure storage of practitioners' personal belongings including mobile phones. It is recommended that personal mobile phones are security marked, password protected and insured.
- Visitors, including other professionals, contractors and parents/carers must be made aware by signs and verbal reinforcement that they are not to use their mobile phone where children are present and to hand them into the school office when working with children/teaching areas.
- Under no circumstances are images, videos or audio recordings to be made without prior explicit written consent by the designated safeguarding person.
- Personal mobiles may be used in designated areas at break times.
- Staff are advised to provide their work place contact number to their family members, own children's schools/settings for use in the event of an emergency.
- The setting will not be held responsible for any loss or damage of personal mobile phones.

#### **Roles and Responsibilities**

##### **All Staff**

- To ensure that mobile phones are not taken into classrooms between 8:30 and 3:30 and are not accessed in learning time.
- To ensure all visitors to school are aware of the mobile phone policy and that they must not use them within classrooms. This includes parents.
- When going on a school trip and own mobile phones are used, the camera facility must not be used to take photos of the children. It should only be used as a phone in case of an emergency. Where possible, the school mobile should be the only phone taken on a school trip.

##### **Governing Body**

- To monitor and evaluate Mobile Phone and Camera policy and procedures.

## Camera and Image Policy November 2021

### Aim

To safeguard children by promoting appropriate and acceptable use of photographic equipment and resources for storing and printing images.

To adhere to relevant legislation such as the Data Protection Act 2018, the Freedom of Information Act 2000 and the Human Right Act 1998.

### Procedures

- Consent is required under the Data Protection Act 2018 as images are considered to be personal data.
- All images are to be stored and disposed of in line with Data Protection Act 2018.
- If images are to be stored for a short period of time they must be password protected on a computer storage device.
- Security procedures must be monitored and reviewed regularly by the designated safeguarding officer. The security procedures include protection against theft of equipment and computer security.
- **Consent forms must be signed by parents/carers with parental responsibility when they register their child with the setting and copies of the consent forms should be provided for the parents.**
- Images must not be used for anything other than the agreed purposes unless additional consent is obtained.
- Photographs must be appropriately disposed of should they be no longer required. This could include giving the images to parents, deleting or shredding.
- Where group photographs of children are to be taken, written permission must be obtained from all parents /carers who have the right to refuse.
- The purpose and context for any proposed images should always be considered to decide whether a photograph or video are the most appropriate method of recording the information.
- The purpose of taking any images is to be clearly explained for example marketing of the school, prospectus, website, or local newspaper, use in display and to document children's learning. Consent must be gained from parents for these purposes.
- Each reason is to be clearly explained and agreed with an option for parents/carers to refuse any or all of the discussed uses and to withdraw consent at any time. Any consent should be reviewed annually.
- Consent for the use of images applies to adults as well as children.
- A child's full name should not appear alongside their photographs particularly if the images are to be used in public areas or on the website.

## **Use of a Professional Photographer**

- Only a reputable photographer who can provide evidence of authenticity will be used. Their photographic identity will be checked on arrival by a member of office staff.
- They should be viewed as visitors therefore appropriate supervision will be in place at all times to ensure no unsupervised access to children. They will be supervised by a person who is in regulated activity
- Checks will be in place to ensure that they comply with Data Protection requirements, to agree that images will only be used for the agreed specified purpose and not be disclosed to any third person.

## **Roles and Responsibilities**

### **All Staff**

- To ensure that all photos used in books eg the Learning Journey are of a single child where possible.
- To ensure that photographic consent is received and reviewed annually by parents.
- To ensure that consent has been given for children's photos to be used on the school website and/or in local newspapers.
- To have a responsibility to ensure that all photographs are held securely and not left open to abuse.

### **Early Years Staff**

- To ensure all photos contain in Learning journey books only contain photos of that child, or siblings. All other faces should be either coloured in or a sticker stuck over them.
- To ensure that photos taken to provide evidence of children managing own hygiene are discreet, e.g of hand washing at the sinks.

### **ICT Co-ordinator**

- To ensure that photos stored within the school network are protected from members of the public and cannot be accessed without a logon and password.

### **Designated Child Protection Teacher**

- To ensure that photos are not used by, for or within the school that are inappropriate in any way.
- To ensure that photos used will not put any child at risk of harm.

### **Parents/Carers**

- The use of any photographic equipment by staff, parents or visitors must be with the consent of the head teacher, manager or person in charge.
- The head teacher and other staff members will have the authority to challenge anyone using photographic equipment without prior consent.
- Parents and carers are not covered by Data Protection Act if they take photographs or make a video recording for their own private use
- Parents are always reminded that any photographs taken with children other than their own in are not to be used on social networking sites.

### **Closed Circuit Television (CCTV)**

- Images of people are covered by the Data Protection Act so it applies to CCTV.
- All areas covered by CCTV must be well signed posted and notifications are to be displayed so that individuals will be advised before entering such areas.
- Data protection and information guidelines are to be followed at all times. This to include the appropriate storage and disposal of all recording.
- For information and guidance please refer to the ICO publication 'CCTV code of practice'. Revised edition 2008. This has not been formally updated since the new Data Protection Act 2018 so should be used alongside the ICO's 'In the picture: A data protection code of practice for surveillance cameras and personal information'. (2017)

CCTV has been installed in the entrance lobby of the Victoria Road site and in four locations at the Orchard site. It has been installed with the purpose of identifying visitors to the school and helping visitors, parents, staff and pupils to safely enter and leave the school.

This policy is to ensure that the school is meeting its legal responsibilities, whilst ensuring the privacy of visitors, parents, staff and pupils and demonstrating our own commitment to that privacy.

The monitor for the both sites is located in the school office, which is not within the view of visitors.

- The recording of the images last for approximately 3 weeks before they are recorded over. The school does have the facility to save the images, but does not make use of this facility at present.
- There should be no reason to disclose images to anyone except where they is a legal obligation. Any other requests will be considered by the data controller.
- Sign are in place to inform people that CCTV is in operation and these signs convey appropriate information. They can be found outside the school by the main door and inside the entrance lobby.
- CCTV has been installed in the entrance lobby of both schools with the purpose of identifying visitors to the school and helping access and exiting the buildings. Images of staff will only be used if an incident is seen which cannot be ignored such as criminal activity, gross misconduct or behaviour which puts others at risk.
- Individuals, whose images are recorded have the right to view the images of themselves and, unless they agree otherwise, to be provided with a copy of the images. This must be provided within 40 calendar days of school receiving their request. School will charge a fee of £10 for this,
- Any request to view the images under the Freedom of Information Act 2000 will be considered to and responded to within 20 working days of receipt of the request.
- If the images are those of the requester than the information is exempt from the FOIA and the request will be treated as a data protection subject access request.
- If the images are of other people, these can be disclosed only if disclosing the information in question does not breach the data protection principles.
- On some occasions where footage is exempt from FOIA it may be lawful to provide it on a case by case basis without breaching DPA, where the reason for the request is taken into account. The Data Controller will consider those requests on a case by case basis.
- There will an annual review of the system's effectiveness. Staff are made aware that they could be committing a criminal offence if they misuse CCTV images.