



The Dell Out of School Club

Registered Charity No. 1038546

Policy No.

DP – 1.01b

Mobile phones
photography and social
networking/GDPR
Reviewed 7th August 18
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Safeguarding E-Safety

Including the use of Mobile Phones/Photography and Social Networking

The Dell club takes the safeguarding of children and young people extremely seriously as a matter of both legal and moral importance. This policy aims to cover mobile phone use as well as minimise the risk of inappropriate use of photos of children taken/used via phones or other media sources. 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. And the provisions are as to safeguard employees as well as the children.

In accordance with our duties under The Data Protection Act 1998, (and under GDPR regulations 2018) 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 the Act, formal written parental consent.

It is likely that there will be occasions during a child's time at the setting when the club may wish to photograph or video children as part of the EYFS photography observation or to record an achievement to show their parent/carer. The Dell have their own camera equipment/SD cards for this and any photographs of children and the equipment should remain on site premises. Staff are strictly prohibited from using mobile phones and cameras at any time during work (onsite or during trips/outings) without the prior consent of the Manager and child's parents.

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.

If permission is granted for parents to take photographs onsite or during trips/outings, parents must only take images (still or moving) of their own children and may not take images of other children unless they have permission from those parents.

Parents, staff or visitors who suspect anyone of taking images of children without consent must report the incident to the Manager immediately.

Should the club have 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.

Staff Procedures for Mobile phones

- Making personal phone calls or sending text messages is not allowed at The Dell Out of School club, whilst working with the children.
- All personal mobile phones and cameras belonging to staff or visitors will be kept in an area designated by the club's manager.
- 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. If staff are waiting for an important call then

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they should discuss this with Coordinator in the first instance. Staff are requested to communicate The Dells telephone numbers to friends and family in the case of an emergency.

- During outings staff will only have access to the club's mobile phone.
- Staff caught taking photos of the children from the Dell via personal cameras/phones or other electronic devices will be subject to disciplinary action. See our safeguarding policy for more details.

Parents, carers and visitors and mobile phones

- Parents and carers are reminded that they should not be using mobile phones when collecting their children and in particular the use of any camera or digital recording equipment of their child or other children whilst in the school grounds and at the setting is prohibited.

Social media and networking

The Dell recognises that employees may engage in social networking while off duty. Social networking for the purposes of this policy includes all types of postings on the internet including but not limited to social networking sites i.e. Facebook or LinkedIn) blogs and other online journals and diaries, bulletin boards and chat room, micro blogging i.e. twitter and the postings of video on You Tube and similar media. Social networking also includes permitting or not removing postings by others where an employee can control the content of postings such as on a personal profile or blog. This policy applies to social networking while off duty.

This policy is an overview of what is a broad and rapidly changing area which affects individuals both at home and work. Therefore all employees are asked to use their own professional judgement where they are in doubt about what is/is not acceptable behaviour.

The policy outlines a number of factors which employees should consider whilst using social media in order to safeguard themselves and their employment via The Dell. Employees are asked to take a professional and responsible approach to their online activities at all times.

Employees who engage in social networking should be mindful that their postings, even if done off the premises and while off duty, could have an adverse effect on the Dells legitimate business interests. For example information posted could be the Dells confidential business information.

Bear in mind some readers may view employees as a *de facto* spoke person. To reduce the possibility that your personal social networking will have an adverse effect on the Dell we ask that you observe the following guidelines when social networking:-

- Not to engage in social networking using any of The Dell (or schools) electronic resources and/or when you are supposed to be working.
- The Dell supports the rights of individuals to express an opinion however such rights should not contravene this policy or any of The Dells other organisational policies including safeguarding, use of mobile phones/photography, data protection, equality, bullying and behaviour management etc.
- Staff are not permitted to accept or send "friend requests" to children who attend the club.
- All requests for references, information or recommendations which are via social media should be handled in accordance with the companies Dells standard policy for responding to such requests.

If your social networking includes any information related to the Dell please do the following:-

- Make it clear to your readers that any views expressed are yours alone and do not reflect the views of The Dell, by stating for example. "*The views expressed in this post are my own. They have not be reviewed or approved by The Dell.*"

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- Not to discredit The Dells services or those of our users or competitors. Not mention/name the Dells users, school/external staff/visitors or other employees without prior approval.
- Not use/store or transmit photos of the children (or other co workers at work).
- Not to disclose personal or contact information.
- If someone from the media or press contacts you directly about your social networking activities that relate to the Dell, speak to your manager before responding.

Staff should also consider the following if your social networking includes any information related to the Dell;

- The Dell has spent substantial time and resources building up its reputation and goodwill. These are valuable and important corporate assets. Before you engage in any social networking that identifies yourself as an employee of the Dell (or that identifies the Dell) then please consider whether you are/will be damaging the Dells reputation. If you are uncertain you should consult your manager or H.R manager before posting.
- Complaints about work are more readily resolved by speaking directly with your Manager or H.R Manager than by posting complaints on the internet. If you decide to post complaints or criticism, avoid doing so in a way that is defamatory or damaging to The Dell, or any of the Dells employees or customers.

The company will use its discretion review your social networking activities. Please note that this policy applies, even if your social networking is anonymous or under a pseudonym. If you do engage in social networking, you should be aware that in appropriate circumstances the Dell will take steps to determine your identity.

In certain circumstances the company may request in its sole and absolute discretion, that you confine your social networking to matters unrelated to the company, if the company determines that this is necessary or advisable. For example if a colleague/ child from The Dell were subject to a safeguarding investigation.

Failure to comply with this policy may lead to disciplinary action up to and including dismissal, and if appropriate the Dell will pursue all available legal remedies. The Dell also reserves the right to report suspected unlawful conduct to appropriate third parties i.e. the police, Herts. Safeguarding Board and OFSTED.

If you need clarification of any aspect of this policy contact you manager or HR manager.

Policy adopted: 12th March 2013

Approved by:

Co-ordinator

Chair

Review Date:

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