

# Sample Policy on the use of Internet, Photographic and Recording Devices

## Policy Statement

Riverside Childcare is committed to ensuring the appropriate use of the internet within the service and to setting out clear guidelines regarding the photographing and recording of children.

### Principle

This policy is underwritten by the Child Care Act 1991 (Early Years Services) Regulations 2016, the Data Protection Act 2018, GDPR and Tusla's Quality Regulatory Framework.

## Policy

The purpose of this policy is to set out what is considered to be the appropriate use of internet, photographic and recording devices. This policy ensures a preschool child is not permitted access to the internet, photographed or recorded without prior signed permission.

### Email and Internet Usage

The internet is not to be accessed by children unless under the supervision of service educators for the purpose of educational research or learning opportunities. The email system and internet must only be used by staff for business purposes which includes the following activities:

- Communication on matters relating to job requirements or for administration purposes.
- Communication of information relating to the service.
- Research of new technologies and educational resources.

### What is unacceptable use of email and the internet?

- Providing children with opportunities to unsupervised internet access or access to inappropriate internet content, that could affect a child's health, welfare and development.
- To access, download or store inappropriate, defamatory or offensive material.
- For personal financial gain or profit.
- To disclose or publish confidential information about children, families or staff.
- For posting messages to any internet bulletin or discussion board, newsgroup or other publicly accessible discussion forum except for authorised business purposes.
- Offensive language and language that would breach any other service policy.
- The service reserves the right to block inappropriate websites.

### Social Networking Sites and Social Media Tools

The requirements outlined above in relation to your use of service email and internet systems apply to Social networking sites and other social media tools such as Facebook, LinkedIn, and Twitter.

- While reasonable personal use will be tolerated subject to the conditions referred to above, your use of social networks, social media tools and other non-business-related sites may be monitored.
- No digital imagery/photos/videos of children or families is to be published on social media sites/networking sites unless authorised to do so for publicity purposes (always protecting the identity of the children)

- Employees are not permitted to be 'friends' with or engage with Riverside Childcare's parents and families on social networking sites.
- You must not make any derogatory comments about the service, its team members, contractors, or children/families attending the service on social networking sites.
- When commenting either on blogs or in public forums, be mindful of your association to the service and your obligation to be responsible and positive in your portrayal of the service.
- Photographs, videos and/or information about other staff members are not to be posted without the specific permission of the individual.
- Staff are not to divulge or discuss any confidential or personal information obtained while employed or associated with the service.

### **Communicating Information via Email**

All guidelines and policies relating to signing and authorisation for written communications must be observed when sending electronic mail. Staff must keep in mind that anything created on a service computer network or the internet may be reviewed by others. Copies of any business-related electronic communications and attachments (sent or received) should be kept in accordance with proper record-keeping practices.

### **Maintaining Confidentiality and Security**

Hardware Personal memory devices (USB) may be used at work and may be plugged into service IT resources. An automatic virus check will be run when any documents are opened. However, knowingly introducing a virus or causing a virus to be introduced into service IT resources is a breach of this policy. Personal computers must be shut down at the end of each day. Usernames and passwords must only be used by the person to whom they are allocated. The use of Riverside Childcare internet is not a private activity. Riverside Childcare internet must not be used to access, carry, send or use private material or information that a person would not want the service to see.

### **Photographic and Recording Devices**

Consent forms must be signed by parents/guardians and copies of the consent forms should be provided for the parents. Images cannot be used for purposes other than those agreed. All images are to be stored and disposed of in line with the GDPR. Where group photos of children are taken, parents/guardians must provide written permission as they have a right to refuse. The purpose of taking images must always be clearly explained to parents/guardians. Parents/guardians have a right to refuse or to withdraw permission at any time.

The use of any photographic or recording devices by staff, parents or visitors must be with the consent of the designated person in charge. Parents/guardians must be informed of their responsibilities around the taking of group photos and that it is not ok to take group photos if not all children present have consented to their photograph being taken. **Any consent must be reviewed on a regular basis and at least annually.**

### **Use of photographic and recording devices in the service:**

Staff members take photos of children in Riverside Childcare for a variety of purposes as set out below.

The purposes for which photos and/or recordings may be used in the service:

- To document children's learning and development.

- To communicate with families.
- To record evidence in the event of an accident/incident involving a child.
- For safety, for example, group photographs on outings for speedy identification of individuals in the case of any incident.
- To support quality assurance, for example, in the Sólta Quality Assurance Programme.
- Local news or online social media, for example, local newspapers, Facebook etc.

### **Who can view, listen, or retain photographs or recordings of a child:**

Signed informed consent must be obtained for each child from their parent/guardian to access the internet, be photographed or recorded in accordance with this policy.

The parent/guardian consent form includes:

- When, in what circumstances and for what purpose the child is permitted access to the internet.
- When, in what circumstances and for what purpose the child will be photographed (see sample list of uses above).
- When, in what circumstances, in what way and for what purpose the child's activity and/or voice will be recorded (see sample list above).
- Consent for photographs and videos to be taken of children – include specific information about how the photos/video will be used and displayed.
- How and with whom images and/or recordings will be shared, including with other parents in the service, for example, a video recording of a group activity, an event or a performance.
- That CCTV use will be in compliance with Data Protection requirements.
- How images on record will be dealt with when their child leaves the service.

The completed Parent/Guardian Consent Forms must be retained on the child's individual file.

### **Children's agreement**

Where possible, in addition to parents' consent, children's agreement is obtained to:

- Take their photograph.
- Record or use their voice and/or activity.
- Display or share their photos or recordings.
- Use of personal devices in the service

### **Personal Devices:**

Staff members, families, contractors and visitors may bring personal devices into the service. Personal 'smart' devices, such as phones or tablets, will not be used in the presence of children and will be switched off during working hours, except at break time in designated areas. Staff members will not take any images, video/audio recording of children or families at the service, on their personal devices. Children are not allowed to bring personal 'smart' devices, such as phones or tablets to the service. When visiting the service, parents or other visitors may not use personal 'smart' devices, such as phones or tablets, to take photos or videos or engage with children other than their own child.

### **Storing images and recordings securely**

Images or video recordings of children must be kept securely. Hard copies of images must be kept in a locked filing cabinet/drawer and electronic images stored in a protected folder with restricted/password protected access.

Images and recordings will be retained with the child's individual file.

Images must not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones. Personal equipment must not be used to store photos and recordings of children, and only cameras or devices belonging to the service should be used.

Digital equipment must remain within the service at all times (this includes appropriate use on outings) and be stored securely when not in use.

### **Record keeping:**

Photos/videos are retained for a period of 3 years unless parent/guardian requests that they are deleted. After 3 years they are deleted from digital devices/websites or if in hard copy, they are given to parents. Photos/videos are deleted immediately at the request of a child's parent/guardian.

This policy will be reviewed on an annual basis.

### **Person Responsible:**

This policy was reviewed by Riverside Childcare on Date: 01/08/23

Signed by: Michael Dunster on behalf of Management (Manager, Owner, Chairperson)



Review Date: 01/08/25

**Use of Internet, Photographs and videos:**

Pre-school children will not be permitted access to the internet, photographed or recorded other than in accordance with the terms set out in our policy.

**Photograph Consent Form**

Child's name \_\_\_\_\_ Date completed \_\_\_\_\_

The issue of child safety is taken very seriously at Riverside Childcare. Images of the children may be used for **display/training purposes within the service**. While we may have parent/guardian consent, we **also respect your child's right to privacy and consent to having their photo taken** or not taken if they don't seem to agree. Photographs taken will be for the use of Riverside Childcare and parents. We will not share photographs with other third parties without your consent. We aim to minimise the potential for misuse by having effective safeguards in place to protect children. We will **never include the full name** of the child alongside an image.

**Under no circumstance parents will share any photographs of the children attending Riverside Childcare with any other third parties.** Only the parents registered within our Little Vista app have access to these photographs.

Please see the service's policies for further details on our procedures on storage, retention time and removal of photographs.

Please circle yes or no below to indicate if you wish to provide consent or not:

- I give permission for my child's photograph to be used **within Riverside Childcare for display purposes** including **Little Vista App** to which only parents/guardians have access to:

Yes

No

- I give permission for my child's photograph to be used in the **Riverside Childcare Website and Social Media Accounts** (Facebook, where children must remain unidentifiable (blurred face)).

Yes

No

- I understand and agree that pictures shared on our **Little Vista App** of any child attending Riverside Childcare **must not be in any way shared, screenshoted or reproduced** by anyone:

Yes

No

Parent/guardian signature (1) \_\_\_\_\_ Date: \_\_\_\_\_

Parent/guardian signature (2) \_\_\_\_\_ Date: \_\_\_\_\_

I understand that I can withdraw my consent or request to see photographs taken at any time. I understand that additional consent will be obtained should images be taken or used by a third party, used in publicity materials or in the media. This form is valid for the duration of your child's time at our setting. It is your responsibility to let us know if you want to withdraw or change your consent at any time.