

# Online Safety

## Camera and Image Policy



### 1 Introduction

- 1.1 The use of cameras should be considered an essential and integral part of everyday life. As such, children and young people and early years practitioners and their managers are to be encouraged to use such technology in a positive and responsible way.
- 1.2 It must be recognised however, that digital technology has increased the potential for cameras and images<sup>1</sup> to be misused and inevitably there will be concerns about the risks to which children and young people may be exposed.
- 1.3 Practical steps must be taken to ensure that the use of cameras and images will be managed sensitively and respectfully. A proactive and protective ethos is to be reflected which will aim to promote effective safeguarding practice.
- 1.4 It must however be acknowledged that technology itself will not present the greatest risks, but the behaviours of individuals using such equipment will.

### 2 Aim

- 2.1 The Camera and Image Policy will aim to ensure safer and appropriate use of cameras and images through agreed acceptable use procedures. This is to be in line with legislative requirements and will aim to respect the rights of all individuals.

### 3 Scope

- 3.1 The Camera and Image Policy will apply to all individuals who are to have access to and/or be users of work-related photographic equipment. This will include children and young people, parents and carers, early years practitioners and their managers, volunteers, students, committee members, visitors, contractors and community users. This list is not to be considered exhaustive.
- 3.2 The Camera and Image Policy will apply to the use of any photographic equipment. This will include mobile phones and portable gaming devices with inbuilt cameras as well as other forms of digital technology and resources for storing and printing images.

### 4 Responsibilities

- 4.1 The Senior Designated Person for Safeguarding (SDPS) is to be responsible for ensuring the acceptable, safe use and storage of all camera technology and images. This will include the management, implementation, monitoring and review of the Camera and Image Policy.
- 4.2 Further details on the responsibilities of the Senior Designated Person for Safeguarding, registered person, early years practitioners and their managers, parents and carers, children and young people are to be found in the Acceptable Use Policy.

### 5 Legislative Framework

- 5.1 This policy complies with the requirements of the General Data Protection Regulation (2018), Freedom of Information Act 2000, Human Rights Act 1998 and other relevant Acts, regarding the taking and use of photographic images of children.
- 5.2 All images will be used in a manner respectful of the eight Data Protection Principles.
- 5.3 This means that images will be:

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<sup>1</sup> Photographic, digital, video and audio recordings.

- Fairly and lawfully processed
- Processed for limited, specifically stated purposes only
- Used in a way that is adequate, relevant and not excessive
- Accurate and up to date
- Kept on file for no longer than is necessary
- Processed in line with an individual's legal rights
- Kept securely
- Adequately protected if transferred to other countries.

Where necessary, registration as a data controller will be applied for to allow personal information to be processed.

## **6 Code of conduct**

- 6.1 All early years practitioners and their managers must ensure that the policy and procedures included herein are to be adhered to at all times. The Camera and Image Policy must be considered in conjunction with Acceptable Use Policy, Internet Policy and ICT Misuse Policy.
- 6.2 The use of cameras and other photographic equipment is only to be authorised by the Senior Designated Person for Safeguarding. Early Years practitioners and their Managers should use such equipment for purposes designated by the Senior Designated Person for Safeguarding. It must be recognised that individuals may be given different levels of responsibility in terms of authorised use.
- 6.3 Wherever practical, cameras and other photographic equipment will be designated for work-related purposes only. Such equipment must be booked and signed out accordingly. The use of personal photographic equipment is to be avoided. Should it be considered that such use is not to be precluded for a given reason, explicit authorisation must be obtained from the Senior Designated Person for Safeguarding and all relevant details of use are to be recorded.
- 6.4 Early years practitioners and their managers must report to the Senior Designated Person for Safeguarding to book out cameras or other photographic equipment. The Senior Designated Person for Safeguarding will be responsible for ensuring that the following information is to be recorded each time equipment is booked out:
- Name of individual using the equipment.
  - Date and time equipment is booked in and out.
  - Type of equipment used.
  - Purpose
  - Any difficulties encountered or concerns reported.
- 6.5.1 The use of personal USB sticks, the transferring of images via free unfiltered web email or via mobile media is to be avoided. Should remote access be given to servers or systems where images are to be stored, access will only be given as authorised by the Senior Designated Person for Safeguarding.
- 6.6 The Senior Designated Person for Safeguarding must reserve the right to view any images taken and/or to withdraw or modify an individual's authorisation to take or make images at any time. Early years practitioners and their managers must ensure that all images are available for scrutiny and be able to justify any images in their possession.
- 6.7 The Senior Designated Person for Safeguarding will be responsible for ensuring the safe storage of all images, in accordance with the Camera and Image Policy. Early years practitioners and their managers are to have a duty to report any concerns relating to potential misuse. Clear whistle-blowing procedures are to be in

place. An anonymous reporting system will also be promoted and used to facilitate this process.

## **7 Consent**

### **7.1 Statement of intent**

- 7.1.1 General signed consent to take photographs or record images of children will be requested from the parent or carer on enrolment of their child. The purpose for taking any images is to be clearly explained and agreed. Any consent given is to be reviewed on a regular basis (of a period of no more than one year) until such time the child or young person will no longer attend the setting. This consent will cover the taking of images for general purposes, such as taking photographs which will be used to document children's learning.
- 7.1.2 Consent must be requested because an image of a child or young person is considered to be personal data under the Data Protection Act 1998 and consent must be obtained as a requirement of the Act. The requirement for consent will be applied to all children and young people under the age of 18 years (or from the young person, if deemed to be competent to make such a judgement, from the age of 12 years). The child's view is always to be considered, regardless of age.
- 7.1.3 It should be recognised that some children and young people will be more vulnerable than others, for example disabled children, children in care, those with a child protection or child in need plan, children with English as an additional language, black, minority and ethnic children and those who have been subject to domestic abuse. For a range of reasons, such children's security may be compromised more than others, and therefore extra precautions must be considered in such circumstances.

### **7.2 Procedures**

- 7.2.1 Prior consent will always be obtained in writing before any images will be taken. Verbal consent will not be accepted under any circumstance. If it should not be possible to obtain prior written consent, no images will be taken involving the individual child or young person concerned.
- 7.2.2 Individuals who do not have parental responsibility, such as childminders, friends or other relatives will not be able to give such consent. Only consent provided by a parent or carer with parental responsibility is to be accepted.
- 7.2.3 The parent or carer will reserve the right to refuse or withdraw their consent at any time. Partial or restricted consent may also be given where deemed necessary by the parent or carer.
- 7.2.4 Specific consent for the use of images for purposes other than those previously stated and agreed will be requested, for example, should images be required for publicity materials or to support the training needs of early years practitioners and their managers. Such consent will detail how the photographs are to be used and for what period of time such permissions will cover.
- 7.2.5 Images must not be used for anything other than the stated purposes; unless additional revised consent is to be obtained. A copy of the relevant image will be stored with the specific consent form.
- 7.2.6 Images of children who are to no longer attend the early years setting will not be used, unless specific consent has been obtained to cover this extended period. Generally, consent to use images will lapse should a child leave the early years setting.
- 7.2.7 Images of children if held for which consent has never been given are not to be used, unless the specific consent of the parent or carer is to be obtained. Should it not be possible to obtain such consent, such images are to be returned to the individual concerned or destroyed.

## **8.1 Statement of intent**

- 8.1.1 It must be recognised that children and young people could be exposed to potential risk should images be misused, including:
- The making, taking and distribution of inappropriate and indecent images.
  - Grooming (the process by which child sex offenders and paedophiles will befriend victims through direct or indirect contact, often preceded by efforts to gain personal information about the child or young person).
- 8.1.2 It must be remembered that such incidents fortunately remain very rare; but it should also be understood that detailing such concerns will often raise further anxieties and will make many individuals feel uncomfortable. It must be acknowledged however, that the first step towards minimising any danger will be to have a fuller understanding of what constitutes a risk and what behaviours may compound it.
- 8.1.3 Protective and precautionary measures should therefore be considered when taking, making or using images of children. It is to be ensured that all early years practitioners and their managers are aware of the potential for images to be subject to misuse; and therefore will be expected to agree and sign up to an Acceptable Use Agreement (in line with the Acceptable Use Policy).

## **8.2 Procedures**

- 8.2.1 The purpose and context for any proposed image should always be considered. It must be determined whether taking a photograph or video, for example, will be the most effective option or whether alternative methods of capturing information are to be judged more appropriate in the given circumstance.
- 8.2.2 Careful consideration must be given before involving young or vulnerable children who may be unable to question why or how activities are to take place.
- 8.2.3 Sensitivity must be shown to any child or young person who is to appear uncomfortable; and the potential for misinterpretation is to be recognised. Images will therefore not be taken of any child or young person against their wishes. Coercion must not be used to encourage a child or young person to participate when it has been indicated that they clearly do not want to be involved. A child or young person's right not to be photographed is to be respected.
- 8.2.4 The taking or making of images of a child or young person in a one to one situation with an adult is to be avoided whenever possible; unless there is an agreed, specified reason for doing so. It must be recognised that the context of such situations is likely to be perceived as sensitive and the use of cameras will be seen as intrusive and open to misinterpretation. It is to be recognised that this may leave both the adult and child in a vulnerable position and is therefore not to be considered accepted practice.
- 8.2.5 It is to be recognised that individual close-up pictures of a child or young person often provides little context or purpose, and most often, an image of a group of children will show an activity or situation to better effect. Unnecessary close-up pictures of an individual child or young person with no surrounding context or purpose are therefore to be avoided. The vast majority of photographs taken in the setting environment will therefore be general shots of whole or small group activities.
- 8.2.6 Where group photographs of children and young people are to be planned, permission must be obtained from all parents and carers. If any parent or carer has indicated that their child is not to have a photograph taken, then a group photograph will not be considered appropriate.

- 8.2.7 Photographs are not to be taken of any child or young person should they suffer an injury; whether it is to be considered accidental or non-accidental. This will be deemed a misuse of power which will potentially cause the child or young person to become distressed or to feel humiliated. Where necessary, medical help will be sought, and in the case of a suspected non-accidental injury the Safeguarding Policy will be implemented with immediate effect.
- 8.2.8 All images to be taken should represent the diversity of the children and young people who attend the early years setting. No child is to be favoured in photographs.
- 8.2.9 Images which could be considered to cause distress, upset or embarrassment must not be used.
- 8.2.10 Images of children and young people must only be taken when they are in full and suitable dress. In no circumstances, are images to be taken of children or young people in any state of undress. Should children and young people be participating in sport activities, careful consideration must be given to the appropriateness of taking such images, in particular the angle of which shots may be taken.
- 8.2.11 The taking or making of images in sensitive areas of the early years setting, for example, toilet cubicles and changing areas are not to be permitted.
- 8.2.12 It should be ensured that a child or young person's name or any other identifying information does not appear in any caption or accompanying text alongside their photograph, for example on displays, documentation panels and name cards. Particular care is to be taken where such images are likely to be viewed by others, including the general public.
- 8.2.13 It is to be ensured that if, on occasion, a child or young person is to be named (for an agreed reason) in any published text, for example, in the prospectus, a photograph of the child will not appear.
- 8.2.14 The minimum amount of information possible is to be provided to preserve the identity of children and young people at all times. No personal details, such as home telephone numbers, email or home addresses are to be disclosed in any written or verbal communications. This is to include information that will contribute to the personal profile of a child or young person.
- 8.2.15 Consideration will always to be given to where images are to be published. This will also include where parents are encouraged to be involved with learning platforms, such as 'Interactive Learning Diary'. These systems must be designed to enable parents and carers to access their own child's photographs and work safely.
- 8.2.16 It must be understood that the need to obtain consent for the use of images, is to be applied to adults as well as children.

## **9 Using images of children supplied by a third party**

### **9.1 Statement of intent**

- 9.1.1 It must be recognised that photographs and other images are subject to copyright, which will generally rest with the photographer. Prior permission must therefore be obtained before such images are to be used.

### **9.2 Procedures**

- 9.2.1 Before using any image supplied by a third party, it is to be ensured that the third party owns the copyright and that consent has been given in writing by the individual(s) concerned to use the image.
- 9.2.2 Where a third party provides such photographs/images, they will be obliged to confirm in writing that they have the express consent of the parent or carer to use the said image, where applicable.

## **10 Use of images of children by the media**

### **10.1 Statement of intent**

- 10.1.1 There may be occasions where the press are invited to a planned event to take photographs of the children and young people who are to take part. It should be noted that the press enjoys special rights under the Data Protection Act, which permit them to publish material for journalistic purposes.
- 10.1.2 Generally, parents and carers will take pride in 'press cuttings'. For the majority, this pride will often outweigh any fears about the image and/or information being subject to misuse. However, some parents may object to information about, and images of, their own children being published. As a result, it is to be ensured that parental/ carer consent will be sought before the press is to be given any access to children and young people. Should a parent or carer choose not to give permission for their child to be photographed in such circumstances, this right must be observed at all times.

### **10.2 Procedures**

The manner in which the press will use images is to be controlled through relevant industry codes of practice as well as the law. In this way a check is to be put on the potential improper use of images of children and young people by the press. Additional checks will however also be carried out by the Senior Designated Person for Safeguarding. This will ensure that broadcasters and press photographers are to be made aware of the sensitivity which must be considered in respect of detailed captioning, one to one interviews, and close up sports photography.

Where a press photographer is to be invited to celebrate an event, every effort will be made in advance to ensure that the newspaper's (or other relevant media) requirements are able to be met. Where, for example, a newspaper is to be invited to take photographs of children and young people, it is unacceptable for their names to be completely withheld. Newspapers will be very unlikely to print anonymous photographs. An agreement will therefore be sought between parents and carers and the press which will request that first names only will be published. Responsibility and liability however cannot be held for the actions of a third-party organisation, should they choose not to abide by any such agreement once in place.

Consideration will therefore be given to the requirements of the press before any planned event. Parental/carer permission/opinion will be the key factor in making a decision as to whether the press will be invited or not. This may mean that only those children, whose parents or carers will be happy for photographs and names to be published, can be given the opportunity to be involved in such events.

- 10.2.4 Should it not be considered possible or appropriate to limit the children and young people who are to be photographed, for example, because a specific group of individuals are to have achieved something special (and parental permission regarding the publication of first names is to be withheld by one or more of the group) efforts will be made to negotiate a revised agreement with the press which must be deemed acceptable to all parties. Should it not be possible for such an agreement to be reached, the option of newspaper publicity will have to be forgone.
- 10.2.5 The identity of any press representative will be verified. Access will only be permitted where the event is to be planned, and where press are to be specifically invited to attend. No authorisation will be given to unscheduled visits by the press under any circumstances. In the event that the press should turn up uninvited, for reasons beyond the control of the setting, every reasonable effort will be made to ensure that children and young people and parents and carers are protected from any press intrusion.

10.2.6 Every effort will be made to ensure the press abide by any specific guidelines should they be requested by the setting. No responsibility or liability however can be claimed for situations beyond reasonable control, and where the setting is to be considered to have acted in good faith.

## **11 Use of a professional photographer**

### **11.1 Statement of intent**

11.1.1 It will be ensured that any professional photographer who is to be engaged to record any events will be prepared to work according to the terms of this policy document and the following guidelines:

- In the context of data protection legislation, the photographer will be considered a 'data processor' and any agreement with them will be in accordance with the General Data Protection Regulation (2018).
- Photographers will only be used where they will guarantee to act appropriately to prevent unauthorised or unlawful processing of images; and will insure against accidental loss or destruction of, or damage to, personal data.

### **11.2 Procedures**

11.2.1 Photographers will be asked to sign an agreement which will aim to ensure:

- Compliance with the General Data Protection Regulation (2018).
- Images are only to be used for a specified purpose and will not be used in any other context.
- Images will not be disclosed to any third party unless it is to be a specific requirement to do so in order to fulfil the requirements of the agreement. Such use will also be subject to parental/ carer permission.

11.2.2 Only reputable photography agencies and/or professional photographers will be used. Evidence of such authenticity will be required.

11.2.3 Details of any checks regarding suitability, which are to include evidence of (DBS) Disclosure Barring Service checks, will be requested. Photographic identity will be checked on arrival. Should there be any concerns in respect of the authenticity of any photographer, entry will be refused. Such concerns will be reported as is to be deemed appropriate.

11.2.4 Photographers are to be treated as any other visitor. As such, appropriate levels of supervision will be in place at all times. This will ensure that no unsupervised access to children and young people will be given.

## **12 Children photographing each other**

### **12.1 Statement of intent**

Children may on occasion be given the opportunity to photograph each other and their surroundings. This practice will often occur during off-site activities and for most children it will be normal practice to take photographs to record a trip or event. Children may also be given access to cameras within the setting environment to support their learning and development needs. These activities will be encouraged in a safe and enabling environment.

### **12.2 Procedures**

12.2.1 Early years practitioners and their managers will be required to discuss and agree some age appropriate acceptable use rules with children and young people regarding the appropriate use of cameras.

12.2.2 Nevertheless there may be occasions where children will take inappropriate images, including photographs which may show friends and other children in a state of undress. This practice will be discouraged, and parents will also be advised to monitor their child's use of cameras within the home and social environment.

## **13 The right of parents and carers to take photographs and videos**

### **13.1 Statement of intent**

- 13.1.1 Parents and carers will not be covered by the General Data Protection Regulation if they are to take photographs or make a video recording for their own private use. The Act will therefore not prevent parents and carers from taking photographs or making video recordings of their own children within the setting environment, for example, during nativity plays.
- 13.1.2 The right to refuse parents and carers the opportunity to take photographs and make videos is however to be reserved on health and safety grounds. This right will be implemented should it be deemed appropriate. For example, if an excessive use of flashlights and/or bulky and noisy equipment are to be considered a potential health and safety risk.

### **13.2 Procedures**

- 13.2.1 Parents and carers will be required to complete a Photography Request Form should they wish to take or make any recordings within the setting environment. Authorised use will only be permitted on agreed dates and times, and within designated areas of the setting.
- 13.2.2 Before a photography request can be authorised, consent will need to be obtained from all parents and carers of other children who may be captured in any photograph or video. Should it not be possible, to gain consent from the parents and carers of all children who may be implicated, there will be no option but to refuse an open request to take or make images. Consideration will however be given to organising a one-off photograph opportunity which will only involve those children for who consent has been obtained.
- 13.2.3 Parents and carers will only be permitted to make recordings or take photographs of any event for their own personal use. The use of such images and recordings for any other purpose, without express permission, will be a breach of the General Data Protection Regulation.
- 13.2.4 Parents and carers who are to be authorised to use photographic equipment must be encouraged to be mindful of others when making and taking such images. This will be to ensure minimum disruption to other parents and carers during any event or production. Care must be taken to ensure the view of others will not be obscured and intrusive photography or filming must be avoided at all times. The right to withdraw consent will be maintained and any images or filming must be open to scrutiny at any time.
- 13.2.5 Every effort must be made to ensure that individuals with no connection to the early years setting are to be given no opportunity to film covertly. Early years practitioners and their managers are to have the authority to question anybody they do not recognise (subject to their own safety being ensured) should they be observed using any photographic equipment at events and productions or within the general vicinity. Care will be taken at all times to prevent any opportunist photography or filming taking place.

## **14 Closed-circuit television (CCTV)**

### **14.1 Statement of intent**

- 14.1.1 CCTV is to be used for the following purposes:
- To control access.
  - To monitor security.
  - For site management, for example delivery arrivals.
  - For monitoring purposes, particularly within the porch area

### **14.2 Procedures**

- 14.2.1 All areas which are to be covered by CCTV must be well signposted, and notifications are to be displayed so that individuals will be advised

before entering such vicinity.

## **15 Mobile phones**

- 15.1 The Mobile Phone/Mobile Technology Device Policy is to be referred to in conjunction with this policy.

## **16 Use of internet/internet sites**

- 16.1 The Internet Policy is to be referred to in conjunction with this policy.

## **17 Website**

### **17.1 Statement of intent**

- 17.1.1 It is to be understood that the posting of images on websites may raise particular issues and concerns.
- 17.1.2 It must be recognised that there will be a risk that such images could be subject to manipulation and circulation without consent or even knowledge. The risk that children and young people could be exploited in some way after having their image displayed must also be acknowledged.
- 17.1.3 However, the value offered by websites also needs to be appreciated. They are to give children and young people extensive creative opportunities for design and development. For some children and young people this will provide a medium which will best suit their individual learning style. This will give them the opportunity to succeed and excel. Access to moderated websites is therefore to be encouraged in a safe and age-appropriate environment.

### **17.2 Procedures**

- 17.2.1 Displaying images of children and young people on the setting's external website is to be avoided, wherever possible. Should consideration be given to using images for display, explicit consent from the parent or carer will be required. Any images used will be copy-protected, include a watermark, and/or will be published in low definition to reduce the potential for misuse. Under no circumstances will a child's photo be published on any insecure social networking sites, such as Facebook or Bebo.

## **18 Learning journeys**

### **18.1 Statement of intent**

- 18.1.1 Under the Early Years Foundation Stage, early years practitioners and their managers are to be encouraged 'to track children's progress, [and have] ... a system for channelling the wealth of information gathered about individual children into a manageable summary. Detailed individual observations of self-initiated activity in a particular context, photos and special moments contained in a child's portfolio all document the child's unique learning journey'. (Progress Matters, National Strategies). Such portfolios will often be known as learning journeys and these are to be used to document and monitor the individual learning and development progress of each child in the early years age group (birth to five years).

### **18.2 Procedures**

- 18.2.1 The information contained within each learning journey is to relate to an individual, identifiable child; therefore it is to be treated as personal data. This means that such information is to be stored securely when not in use. The aim will be to avoid unauthorised access to potentially sensitive data.
- 18.2.2 A code of practice trust statement is to be advocated to protect and promote the welfare and individual rights of children and young people. Details of this code of practice will therefore be included on a Learning Journey Consent form. It will also be displayed on the front cover of all individual learning journeys.
- 18.2.3 Consent must be obtained from parents and carers should their child be photographed amongst a group of children; and where consideration is to be given

to including that image in a learning journey belonging to another child. It will be anticipated that this will be a regular occurrence, as group activity shots are to be encouraged.

18.2.4 Where possible, therefore, 'blanket' consent will be requested from parents and carers for group images to be included in the learning journeys of other children. Parents and carers must be given the option to view any images before they are to be included in any learning journey, should they request to do so. Parents and carers will also be permitted to restrict their consent. This may mean that group images can only be included in specified learning journeys, for example, those which are to belong to close friends. Should it not be possible to obtain consent, the relevant image must not be shared across learning journeys of other children.

18.2.5 Individual learning journeys, although to be constructed by early years practitioners and their managers, are to be provided for the benefits of the individual child and their parents or carers. Parents and carers are therefore to be given the responsibility for choosing what to do with any personal data contained in the learning journey, once it is to be in their possession. However, parents must be made aware that they are not permitted to 'publicise' another child or young person without the express agreement of the parent or carer concerned. Parents and carers must therefore be reminded that they must not share, distribute or display said images without relevant authorisation and consent from the parents and carers of all children and young people captured in any of the photographs.

## **19 Early years practitioners training portfolios**

### **19.1 Statement of intent**

19.1.1 During training, early years practitioners may be required to compile portfolios which will be used to document and evidence their own learning. Part of this documentation is likely to include images of the early years practitioner working alongside children and young people participating in various activities. Should such evidence be required, parent or carer consent will be requested.

19.1.2 The Senior Designated Person for Safeguarding is to have a duty of care to ensure early years practitioners are to act responsibly in compiling the images to be included in training portfolios. Early years practitioners will therefore be monitored in their taking, making and use of such images. All images will be subject to scrutiny and regular audits will be carried out to ensure all relevant policies and procedures are to be adhered to.

### **19.2 Procedures**

19.2.1 The Senior Designated Person for Safeguarding will oversee the compilation of images which are to be used by early years practitioners when completing training portfolios.

Any images which are to be deemed unsuitable for any reason will not be included.

20.2.2 Should images be considered inappropriate, the Senior Designated Person for Safeguarding will ensure the ICT Misuse Policy is to be applied.

## **21 Storage and disposal**

### **21.1 Statement of intent**

Images are to be stored and disposed of securely. The aim will be to prevent unauthorised access, ensure confidentiality and protect identity. All images are to be stored and disposed of in line with the General Data Protection Regulation (2018).

### **21.2 Procedure**

21.2.1 Images will not be kept for longer than is to be considered necessary. The Senior Designated Person for Safeguarding is to ensure all photographs are to be

permanently wiped from memory cards, computer hard and portable drives or other relevant devices once the images will no longer be of use.

- 21.2.2 Should images need to be kept for a short period of time, they must be protectively stored and password protected on the computer hard drive or other appropriate storage device. Such equipment will be stored securely and access will be restricted.
- 21.2.3 Photographs will only be stored on portable storage devices for a temporary period. Express permission must be obtained from the Senior Designated Person for Safeguarding and effective security measures must be in place.
- 21.2.4 Security measures are to be the same that apply to any personal data and means that such data:
- Must be classified as protected, restricted or confidential.
  - Must be marked for relevant disposal.
  - Will not be removed from the site physically or electronically without suitable encryption (password protected is not enough by law).

Suitable encryption software is to be found at: <http://www.truecrypt.org/downloads>  
<http://www.axantum.com/AxCrypt/Downloads.html>

- 21.2.5 All images, including those held within learning journeys will remain on site at all times, unless prior explicit consent has been given by both the Senior Designated Person for Safeguarding and the parent or carer of any child or young person captured in any photograph. Should permission be given to take images off site, all relevant details are to be recorded, for example who, what, when and why.
- 21.2.6 Photographs must be disposed of should they no longer be required. It must be ensured that they will be returned to the parent or carer, deleted and wiped or shredded as appropriate. Copies are not to be taken of any images without relevant authority and consent from the Senior Designated Person for Safeguarding and the parent or carer.
- 21.2.7 A record of all consent details are to be kept on file. Should permission be withdrawn at any time, all relevant images will be removed and disposed of. The record will be updated accordingly.

## **22 Security**

### **22.1 Statement of intent**

- 22.1.1 All images are to be handled as personal data and deemed to be of a sensitive and confidential nature. It is to be recognised that damage or distress could be caused if security is to be breached. The responsibility of being in a position of trust in handling such data must therefore be taken seriously.
- 22.1.2 The Senior Designated Person for Safeguarding is to be responsible for ensuring all information is handled appropriately and securely. Should there be any concerns over breaches of security, the Senior Designated Person for Safeguarding and/or the registered person will be required to undertake an investigation as is to be deemed appropriate. All such incidents are to be recorded and where necessary reported to the relevant authorities. Any actions which are to be identified as a result of any investigations must be implemented with immediate effect.

### **22.2 Procedures**

- 22.2.1 Security procedures are to be monitored and reviewed at the end of every two month period.
- 22.2.2 Under the General Data Protection Regulation, reasonable steps must be taken to ensure the reliability and suitability of any individual who is to have access to personal data. Early years practitioners and their managers are therefore considered to be in a responsible position of trust.

22.2.3 To this effect, effective safer recruitment procedures are to be applied. Rigorous and regular checks are also to be undertaken to ensure the on-going suitability of all new and existing early years practitioners and their managers. All relevant checks must be completed before any new employee, volunteer or student is to be given access to children and/or their personal data.

22.2.4 All early years practitioners are to be required to follow confidentiality and information sharing procedures, which must be agreed to at the time of induction.

22.2.5 The following aspects of security are to be managed accordingly:

- Physical security – effective measures are to be put in place to ensure physical security and to protect against theft, including that of laptops, computers, cameras, and any personal data, including photographic images.
- Computer security – stringent measures are to be implemented to ensure computer security. Awareness will be raised in respect of technological advancements which could put online systems at risks. Security will be updated as and when it is to be required.

## **23 Links to other policies**

### **23.1 Safeguarding Policy and ICT Misuse Policy**

23.1.1 The Safeguarding Policy and the ICT Misuse Policy should be referred to when dealing with any incidents that occur as a result of the intentional or unintentional misuse of ICT. Any allegations of abuse or other unlawful activity should be reported immediately to the Senior Designated Person for Safeguarding who will ensure procedures outlined in the Safeguarding Policy are followed with immediate effect.

### **23.2 Other online policies**

23.2.1 The Camera & Image Policy should be clearly linked to:

- Internet Policy
- Acceptable Use Policy
- Mobile Phone & Mobile Technology Device Policy

## **Authorisation and review**

This policy was adopted at a meeting of Wroughton Preschool

Held on \_\_\_\_\_

Date to be reviewed

Yearly at AGM

Signed on behalf of the management  
committee

Name of signatory \_\_\_\_\_

Role of signatory (e.g. chair/owner)

Chairperson