

USE OF THE INTERNET, PHOTOGRAPHIC AND RECORDING DEVICES POLICY

Over the Rainbow Early Learning Centre Ltd is committed to ensuring the appropriate use of internet within the service and to setting out clear guidelines regarding the photographing and recording of children.

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.

Principle

This policy is underwritten by the Child Care Act 1991 (Early Years Services) Regulations 2016, the Child Care Act 1991 (Early Years Services) (Amendment) Regulations 2016 and the Tusla Quality and Regulatory Framework.

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 internet?

- Providing children with opportunities to access the internet unsupervised or access 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, Twitter and Instagram.

- Reasonable personal use while on break will be tolerated subject to the conditions referred to above.
- No digital imagery/photos/videos of children or families is to be published on social media sites/networking sites without consent.
- 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

- 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/tablets 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 **Over the Rainbow Early Learning Centre Ltd** internet is not a private activity, and therefore, the 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 Data Protection Act 2003.
- 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.
- No personal photographic or recording devices are permitted to be used to take photos of children while in the care of the service.
- Tablets are provided within the service to be used to take photos of children. These photos are only to be used to document learning on ChildPaths or to be displayed within the service.

- Printed photographs of children and or their families used within the service will be returned to the child once they leave.
- It is strictly prohibited to remove any photos of children from the service.
- Photos taken on the tablets are deleted once they have been uploaded to ChildPaths secure servers.
- Photos which are sent in by email are deleted once printed and used within the setting.
- Unused photos are destroyed in accordance with the Record Keeping policy.

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 photograph on outings for speedy identification of individuals in the case of any incident.
- To support quality assurance, for example, in the Síolta Quality Assurance Programme.
- Local news or online social media, for example, local newspaper, 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 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 will be photographed.
- When, in what circumstances, in what way and for what purpose the child's activity and/or voice will be recorded.
- 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.
- How images on record will be dealt with when their child leaves the service.
- The completed Parent/Guardian Consent Forms form part of the registration forms and are 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.

Personal Devices

- Staff members, families, contractors and visitors may bring personal devices into the service.
- 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.

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- 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.
- Images and recordings will be retained with the child's individual file.
- Personal equipment must not be used to store photos and recordings of children, and only 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 on ChildPaths are retained for a period of 3 years unless parent/guardian requests that they are deleted sooner. Hard copy photos are returned to the child once they leave the service and all digital copies destroyed. Photos/videos are deleted immediately at the request of a child's parent/guardian.

ChildPaths childcare management system software

ChildPaths is a web-based childcare management software system designed so parents and guardians can engage in conversation about their child's day. Uploading photos to a child's profile allows staff to interact and communicate better with the children as they can create conversations which are child lead from the photos parents upload over the weekend etc.

- Any information and data that we collect will be for our record keeping use and will be treated under our confidentiality policy, which we legally have to share with the childcare inspectors.
- From a security perspective, the information that travels from our tablets to the servers is encrypted, and the servers are held in Ireland with one of the world's leading hosting providers, Amazon.
- The software is protected by a username and password to access the information.
- Parents only have access to their own child's account.
- Additional security information can be provided on request from Child Paths

Communication

All parents/guardians are informed of this policy on enrolment. Staff members will check with parents that they have read and understood the policy and provide any assistance needed.

A summary of this policy will be included in the parent handbook. This policy will also be reviewed with staff members at induction and annual staff training.

A copy of all policies will be available during all hours of operation to staff members and parents in the Policy Folder located in the setting or on the website www.overtherainbowelc.com

Parents/guardians may receive a copy of the full policy and procedures at any time upon request. Parents/guardians and all relevant staff members will receive written notification of any updates to this policy.

This policy will be reviewed on an annual basis.

This policy was adopted by **Over the Rainbow Early Learning Centre Ltd** on:

Date: _____

Manager

co-Manager

Review Date: _____