

13. USE OF INTERNET AND PHOTOGRAPHIC AND RECORDING DEVICES [INCORPORATING MULTIMEDIA]

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This policy has been communicated to parents/guardians.

Relevant staff know the requirements and have a clear understanding of their roles and responsibilities in relation to this policy.

Relevant staff have received training on this policy.

Statement of Intent: The Service will ensure that the use of multimedia will be age appropriate and supervised when used.

Policy and Procedure:

Computers: Computer skills are considered essential for accessing life-long learning and future employment. The use of the computers is built into the curriculum within the Service. Children will be supervised by staff at all times when using computers at the Service. Technology should be integrated into the learning environment on the same basis as other areas e.g. water area, sand area, home area.

- Access to computers is on a rostered, timed and turn taking basis.
- The software for the computers will be purchased by the Service only.
- The software purchased is educational (age and developmentally appropriate for the various age ranges that access the computers). The Service also purchases 'games' software for the computers

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which is also (age and developmentally appropriate for the various age ranges that access the computers).

- No software for computers may be brought to the Service by children or parents/guardians.
- Health and Safety issues such as viewing distances, seat, height and posture and footrests will also be considered when using computers with children.

Internet Access: The internet is now regarded as a valuable resource to support teaching and learning. At the Service we have an obligation to provide children with as safe as possible internet environment. The Service will obtain written consent from parents/guardians allowing a child to have access to the Internet.

Please see Appendix Q: Parental/Guardianship Consent to Child's Use of the Internet

Core Principles of Internet Safety: Internet is becoming as common place as the TV or telephone and its effective use is an essential life skill. Unmediated internet access brings with it the possibility of placing children in embarrassing, inappropriate even dangerous situations.

- **Guided educational use:** Significant educational benefits should result from Internet use including access to information from around the world. Internet use should be carefully planned and targeted within a regulated and managed environment
- **Risk assessment:** We have a duty to ensure that children in the Service are not exposed to inappropriate information or materials. We also need to ensure that children know how to ask for help if they come across material that makes them feel uncomfortable.
- **Responsibility:** Internet safety in the Service depends on staff, parents/guardians and visitors taking responsibility for the use of Internet and other communication technologies such as mobile phones. It is the Service's responsibility to use technical solutions to limit Internet access and to monitor their effectiveness.

Why it is important for Early Year's children to access the Internet? The Internet is an essential element in 21st century life for education, business and social interaction. We provide children with quality Internet access as part of their learning experience.

Internet access will be tailored expressly for educational use and will include appropriate filtering. Children will learn appropriate Internet use. Staff will guide children in online activities. The Internet is also used in the Service to support the professional work of staff, to allow effective planning and to enhance the Service management information and business administration systems.

How will filtering be managed? Management are responsible for ensuring that the appropriate filters are applied to the PCs/laptops/tablets in the Service. Management will also review the sites accessed.

Staff will monitor the websites being used by the children during sessions.

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If a member of staff uses the Service PCs/laptops/tablets for work, they must ensure that they logout immediately on completing the work.

If staff or children discover unsuitable sites have been accessed on the Service's PCs/laptops/tablets, they must be reported to the Manager immediately so that the filters can be reviewed.

Managing Content: Staff are responsible for ensuring that material accessed by children is appropriate and for ensuring that the use of any Internet derived materials by staff or by children complies with copyright law.

Technology Usage:

- Technology is only used within the Service to enhance and support children's learning and development.
- Where the Service provides access to technology it will ensure the software is suitable for the child's age and stage of development and supports the programme to enhance critical thinking, problem solving and reasonable skills.
- Children with additional needs are accommodated to use technology independently as required.

Communication: Children will not have access to e-mail. Staff using e-mail will use the company email address. This address must not be used for personal e-mail.

On-line Communications and Social Networking: Staff will not discuss individual children or their personal setting on Facebook, Twitter, Snapchat or any other social networking site.

Mobile Technologies: Mobile phones are not permitted within the classrooms.

The taking of photographs on mobile phones is strictly prohibited anywhere in the service.

Children may not bring mobile phones, tablets, or similar devices into the Service

Television/DVD: The use of TV and DVD will be kept to a minimum and will be used occasionally as a treat. If and when such media is employed the programme/film chosen will be age and stage appropriate and will be educational in content. Parents/guardians will be informed with adequate notice of intended usage.

We will ensure that if and when if at all any DVD's watched by children are compliant with the Irish Film Classification Office. This will apply to DVD's rated General (G) or Parental Guidance (PG) only. The Irish Film Classification Office rate G films and PG films as:

General

- A film classified as 'General' should be suitable for children of school going age.

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- Not every child will respond in the same way to particular themes, scenes and images. What might amuse one child, may upset or frighten another, so parents/guardians, who know their own children best, should decide what is appropriate.

Parental Guidance

- A film with a 'PG' cert may be watched by unaccompanied children of any age.
- However, because some element within the overall film might be unsettling for younger children, parents/guardians are strongly advised to satisfy themselves in advance as to whether the film is appropriate for their younger children.

Should parents/guardians not wish their child to watch television/DVD, alternative activities will be arranged by the staff with those children.

The Manager will ensure that an up to date TV license is held.

Gaming Machines e.g. PlayStation, Nintendo Wii, Xbox: Gaming machines are used in the service.

Music CDs: At the Service we value music because it is a powerful and unique form of communication that can change the way children feel, think and act. It also increases self-discipline and creativity, aesthetic sensitivity and fulfilment. The CDs used are appropriate for young children and will contain no offensive or inappropriate language. Radio stations will not be listened to in areas where children can hear them as the content may not be suitable.

Music will not be played too loud so that the children's voices may still be heard.

Camera and Video Devices: We are aware of the need for sensitivity when taking photographs and observe the following:

- Parental permission will always be sought before photos or videos are taken.
- Only the Service's camera/video camera may be used to take pictures.
- Staff are not allowed to take pictures with phones/tablets or their own personal cameras. (If this is breached disciplinary action may be necessary).
- A photograph will only be taken if the child does not object to having his/her photograph taken
- Photographs are used to show positive issues (e.g. a piece of work that the child has worked hard on or is pleased with, children playing cooperatively together etc.)
- We are inclusive so that gender, race, special educational needs and differing abilities are reflected in a balanced way.
- There may be cultural issues of which we need to be aware when taking photographs of children from different ethnic minority groups.

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Where photographs, videos or even samples of children’s work are to be displayed outside the Service we seek parental permission for this to happen. Examples of this are newspaper reports, articles in early year’s publications or exhibitions of children’s work.

We will always get prior permission from parents/guardians for any images/videos collected that we would like to post on our website, Facebook or other social media.

Students visiting professionals or researchers, who need to take photographs or videos as part of their work, are made aware of the need for confidentiality and that children will not be named or identified in any other way. Further parental permission will be sought in this instance.

Videos are also occasionally used in the Service for many of the above purposes. In particular we may use them for observations of children’s play to further our understanding, or for assessment and planning tools

Parents/guardians Photographing and Videoing Children: Parents/guardians may not take photographs or record children in the Service without the consent of the Management

Records: The following records will be maintained:

- when a person can have access to a recording and photographic device
- in what circumstances
- for what purposes
- who can view, listen, or retain photographs/videos
- in what circumstances they can do this
- for what purpose

Use of Photographs: Photographs are used throughout the Service for a variety of purposes.

Generally, Child Care practitioners take photographs of the children throughout the year to capture a particular example of play or something that a child has achieved.

In addition, we use photographs for:

Photographs:	Purpose:	Who can access these photographs and in what circumstances?
Displays of children’s work	A record of ideas and topic references	Staff, Parents, Visitors
Examples of children’s play	As a part of an individual child’s profile	Staff, Parents
Classroom areas	To show the range of activities	Staff, Parents,

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Class albums	For children to look at and talk about	Staff, Parents, Children
Policy folders	To explain the work of the service to parents / guardians and visitors	Staff, Parents, Visitors
Special events and festivals	As a record of the year and for children and parents / guardians to look at and talk about	Staff, Parents, Children
Birthday display	Used as a class resource for talking about birthdays, months of the year etc.	Staff, Parents, Children
Photographic maps of the service and local environment	A resource for topic work	Staff, Parents, Children
From home	To act as a link between home and the service	Staff, Parents, Children
Children's own photographs	Children take photographs on the digital camera, to gain experience in technology	n/a

Storage of Photos: Photographic or video recording will not be stored on devices in the Service for extended periods of time. If a photograph is likely to be used again it will be stored securely and only accessed by those people authorised to do so. We will not re-use photos more than one-year-old, without further permission from the subject of the photo or the parent, as applicable.

Social Media: Photographs posted on social media e.g. Facebook or on our website will be removed after a period of not more than one year from the date the photograph was taken.

Disposal of Photographs: In the event that we no longer require a photo it will be disposed of as confidential waste. When photos are destroyed:

- The CD disk will be made unusable.
- The memory card / USB stick erased.
- The computer file deleted.
- Hard/printed copies and any negatives are destroyed.

CCTV: The system has been installed by the service with the primary purpose of ensuring the safety of children in our care, and helping to ensure the safety of all staff, parents/guardians and visitors consistent with respect for the individuals' privacy.

Data Controller: We have a designated Data Controller and they are responsible for the data/information collected using CCTV.

Management is responsible for the operation of the system and for ensuring compliance with this policy.

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This will be achieved by monitoring the system to:

- Ensure that children are appropriately cared for.
- Assist in the prevention and detection of crime.
- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff and assist in providing evidence.
- Provide opportunities for staff training.
- To investigate accidents.

The system will not be used:

- To provide recorded images for the world-wide-web.
- To provide images for a third party, other than An Garda Síochána in the course of their enquiries.
- Daily monitoring of staff.
- Monitoring staff performance.
- A supervision tool.
- Recording any conversations.

NOTE: If after viewing the CCTV for one of the reasons stated that any inappropriate practice or breach of policies is observed this would be brought to the attention of the employee, they would have the opportunity to view same and depending on the matter this may result in invoking the discipline policy and procedure.

The Data Protection Acts of 1988 and 2003, and the 2016 General Data Protection Regulation (GDPR): CCTV digital images, if they show a recognisable person, are Personal Data and are covered by the Data Protection Acts.

Location: The following areas are currently monitored by CCTV

- Reception.

Fairness: Management respects and supports the individual's entitlement to go about his/her lawful business and this is the primary consideration in the operation of CCTV. Although there will be inevitably some loss of privacy with CCTV cameras are not used to monitor the progress or activities in the ordinary course of lawful business. They are used to address concerns, deal with complaints or support investigations. New employees will be informed immediately, at induction that a surveillance system is in operation. Parents/guardians will be informed when they enrol their child. They will be informed of the purpose of the CCTV and what it can and cannot be used to monitor.

Role of the Management:

- To ensure the system is always operational.
- To ensure that servicing and repairs are carried out as necessary to the system.

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- To respond to any individual's written request to view a recording that exists of him/her or his/her children.
- To ensure prominent signage is in place that will make individuals aware that they are entering a CCTV area.
- To ensure that areas of privacy (toilets etc.) are not monitored using CCTV.
- To ensure confidentiality is maintained at all time. Recorded information will be stored in the office and will only be available to those directly connected with achieving the objectives of the system.

Traceability: Recordings must be logged and traceable throughout their life in the system. They must be identified by a unique serial number indelibly marked on the media shell.

Time and Date Stamping: The correct time and date must be overlaid on the recording image.

Copy/viewing Recordings: Management will respond to a request to view a recording by allowing the viewing to take place, in the presence of management on the premises. This is to protect other children/staff that may be present on the recording. Copies of recorded information must be strictly controlled and only made in relation to incidents which are subject to investigation. They must only be given to authorised third parties. Copies can only be issued by management.

Retention: Recordings are retained for one month

Access to Recordings: There is no obligation on the Service to comply with a request that it considers unreasonable or vexatious or if it involves disclosing identifiable images of third parties. Third parties must give consent. Recordings will however be provided, if required by law or authorised agencies such as the Garda.

- Requests for access to recordings must be made in writing.
- Sufficient information must be provided to locate the relevant recording, a specific date and reasonable time window.
- Viewings will take place, if appropriate, in the service in the presence of management.
- Management will have 21 days to respond.
- If a copy of recording is given to a third party that third party must sign a declaration form that they will not share the tape with anyone else, copy it or use it for unauthorised purposes.
- An incident report will be completed for each incident requiring investigation

If access to or disclosure of the images is allowed, then the following should be documented:

- a. The date and time at which access was allowed or the date on which disclosure was made.
- b. The identification of any third party who was allowed access or to whom disclosure was made.
- c. The reason for allowing access or disclosure.
- d. The extent of the information to which access was allowed or which was disclosed.
- e. The identity of the person authorising such access.

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Where the images are determined to be personal data images of individuals (other than the data subject) may need to be disguised or blurred so that they are not readily identifiable. If the system does not have the facilities to carry out that type of editing, an editing company may need to be hired to carry it out. If an editing company is hired, then the Manager or designated member of staff needs to ensure that there is a contractual relationship between the Data Controller and the editing company.

Data Subject Access Standards: All staff involved in operating the equipment must be able to recognise a request by data subjects for access to personal data in the form of recorded images by data subjects. Data subjects may be provided with a standard subject access request form which:

- a) Indicates the information required in order to locate the images requested.
- b) Indicate that a fee will be charged for carrying out the search for the images.
- c) The maximum fee which may be charged for the supply of copies of data in response to a subject access request is set out in the Data Protection Acts, 1988 and 2003.
- d) Ask whether the individual would be satisfied with merely viewing the images recorded.
- e) Indicate that the response will be provided promptly following receipt of the required fee and in any event within 40 days of receiving adequate information

Signed: _____ **Date:** _____

Name:

Person responsible for approving the Policy

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