



# Mobile phone, smart watches and camera policy

Reference:	A02
Version number:	1.4
Last updated:	October 2023
Next review due:	November 2024 or if legislation/statutory requirements change

## Summary of changes and reviews

Version	Date	Summary of amendments	By
1.0	10 Feb 20	Version control numbering implemented. Adapted from Wishford Schools Mobile Phone and Camera Policy template, superseding the school's own previous policy.	SB
1.1	9 Nov 21	Clarification of restriction on staff calling parents while on trips using their own mobile device, inclusion of Form granting permission/clarifying terms for staff taking images of children with own devices at Appendix 2, and Boarders' Mobile Phone Agreement at Appendix 3.	SB
1.2	25 May 22	Following a conversation with Paul Easterbrook, Director of Education and Compliance at Wishford Schools, the following amendments have been made:  Appendix 2 will now be split into separate documents and each permission form will be specific to the area/department of the school.	NR
1.3	14 June 22	Following a conversation with Nigel Reed about the boarders' use of technology in the evenings:  Appendix 3 has had a change of wording on appropriate Apps and usage	JN
1.4	30 Oct 23	Reviewed early as part of annual staff review pack. No changes other than review dates.	SD



## Contents

Introduction and Aims.....	3
Scope .....	3
Code of Conduct .....	3
Personal Mobiles .....	4
Staff .....	4
Mobile Phones for work related purposes.....	5
Pupils .....	5
Smart watches .....	5
Staff .....	5
Pupils .....	5
Volunteers, Visitors, Governors and Contractors.....	6
Parents.....	6
Dissemination .....	6
Appendix 1 - Guidance on the use of photographic images and videos of children in schools.....	7
Safeguarding concerns .....	7
Data Protection Concerns.....	7
Data Protection Issues.....	7
Recommended Good Practice.....	7
Personal Use .....	7
Official School Use .....	8
Media Use.....	8
Safeguarding concerns and recording images of young people .....	8
Use of Photographic/Filming Equipment by Parents and Spectators .....	8
Publishing Images of Young People.....	9
Summary.....	9
Parental Consent .....	9
Appendix 2 – Permission for staff to record or photograph children with personal devices .....	10
Appendix 3 – Boarders’ Mobile Phone Agreement.....	14



# MOBILE PHONE, SMART WATCH AND CAMERA POLICY

## Introduction and Aims

At Hatherop Castle, the welfare and well-being of our pupils is paramount. The aim of the Mobile Phone and Camera Policy is to allow users to benefit from modern communication technologies, whilst promoting safe and appropriate practice through establishing clear and robust acceptable mobile user guidelines. This is achieved through balancing protection against potential misuse with the recognition that mobile phones are effective communication.

It is recognised that it is the enhanced functions of many mobile phones that cause the most concern, offering distractions and disruption to the working day, and which are most susceptible to misuse - including the taking and distribution of indecent images, exploitation and bullying. However, as it is difficult to detect specific usage, this policy refers to ALL mobile communication devices and cameras.

This policy applies to all areas of the school including children in the Early Years Foundation Stage (EYFS).

## Scope

This policy applies to all individuals who have access to personal devices. This policy applies to all individuals who have access to personal mobile phones on site. This includes staff, volunteers, Wishford personnel, children, young people, parents, carers, visitors and contractors. This list is not exhaustive. This policy should also be read in conjunction with to the following documentation:

- A01 Safeguarding Policy
- B01 IT Acceptable Use Policy
- B03 Bring Your Own Device Policy for Staff, Pupils and Visitors
- C07 Anti-Bullying Policy

## Code of Conduct

A code of conduct is promoted with the aim of creating a cooperative workforce, where staff work as a team, have high values and respect each other; thus creating a strong morale and sense of commitment leading to increased productivity.

Our aim is therefore that all practitioners:

- have a clear understanding of what constitutes misuse.
- know how to minimise risk.
- avoid putting themselves into compromising situations which could be misinterpreted and lead to possible allegations.
- understand the need for professional boundaries and clear guidance regarding acceptable use.
- are responsible for self-moderation of their own behaviours.
- are aware of the importance of reporting concerns promptly.

It is fully recognised that imposing rigid regulations on the actions of others can be counterproductive. An agreement of trust is therefore promoted regarding the carrying and use of mobile phones within the setting, which is agreed to by all users:



## Personal Mobiles

### Staff

- Staff are not permitted to make/receive calls/texts during contact time with children. Emergency contact should be made via the school office.
- Staff should have their phones on silent or switched off and out of sight (e.g. in a drawer, handbag or pocket) during class time.
- Use of personal mobile telephones in the presence of EYFS children is significantly restricted. EYFS staff, and other staff visiting EYFS, should not have them with when they are with EYFS children; they should be locked away or kept in an office, to which children do not have access. The only exceptions are as follows:
  - With express written permission of the Headmaster, for each instance.
  - It is acceptable to have a mobile phone on you when visiting Prep 1 and 2, or in the main school building when EYFS children are there, but it should not be taken out or used in within sight of EYFS children.
  - Mobile telephones may be used in assemblies and or activities, with the permission of the Headmaster, where EYFS children are present, such as for playing music. However, the camera function must not be used.
- Mobile phones should not be used in a space where children are present (e.g. classroom, playground), except in assemblies as outlined above.
- Use of phones (including receiving/sending texts and emails) should be limited to non-contact time when no children are present e.g. in office areas, staff room, empty classrooms.
- It is advised that staff protect access to functions of their phone.
- Should there be exceptional circumstances (e.g. acutely sick relative), then staff should make the Head aware of this and can be given authorisation to have their phone in case of having to receive an emergency call.
- It is highly preferable that legitimate recordings and photographs should be captured using school equipment such as cameras, mobile telephones and tablets.
- If this is not possible, staff may use their personal devices for make recordings and photograph non-EYFS pupils, under the following conditions:
  - a school-owned device (with sufficient quality camera) is not available;
  - the staff member must have written consent from the Headmaster, using the form at Appendix 2;
  - the images of the child must be deleted from the device and any personal cloud storage within 48 hours of being captured;
  - the capture or recordings/images must be justifiable, for work purposes, appropriate for the context, and in line with the safeguarding requirements in this policy; and
  - staff agree to random spot checks to confirm that personal photographs have been deleted from devices.

Under no circumstances are images or recordings of EYFS pupils to be captured on personally-owned devices.

- In exceptional circumstances and with the permission of the Head and with a risk assessment in place, staff can use their personal devices, but these are to be deleted immediately on the return to school in the presence of a member of SLT. However, this should only happen if school devices are unavailable, and this exemption does not apply to EYFS children.
- Staff should report any usage of mobile devices that causes them concern to the Head.



## Mobile Phones for work related purposes

We recognise that mobile phones provide a useful means of communication on offsite activities. However, staff should ensure that:

- Mobile use on these occasions is appropriate and professional (and will never include taking photographs of children).
- Where parents are accompanying trips, they are informed not to contact other parents (via calls, text, email or social networking) during the trip or use their phone to take photographs of children.
- Staff should only contact parents whilst on a trip using their own mobile telephone if it is an emergency. Routine communication should be through the school office, or the schools marketing telephone should be used. (Teachers are encouraged to take the marketing phone with them; both as means of emergency communication, but also to capture photographs of the activities).

## Pupils

Pupils are not allowed to bring in or use mobile phones in school, with the exception of boarders. The following restrictions apply:

- Phones, which must be named clearly, will be used within the boarding house at those times prescribed by the house staff.
- Boarders' phones must be protected with a PIN (Personal Identification Number). This number, known only to the pupil, will prevent others using the device without the owner's permission.
- Boarders will be required to sign the 'Boarders' Mobile Phone Agreement' (at Appendix 3).
- VPNs are not permitted to be installed or used on personal devices.

Mobile phones brought to school without permission will be confiscated and returned at the end of the day.

If mobile phones are used in or out of school to bully or intimidate others, then the head teacher does have the power to intervene 'to such an extent as it is reasonable to regulate the behaviour of pupils when they are off the school site'. Further details are covered in C07 Anti-Bullying Policy and B04 e-Safety Policy.

## Smart watches

For the purposes of this policy, a smart watch is defined as any watch that has the capacity to be connected to the internet or receive notifications. This is discrete from basic activity trackers that do not have connectivity.

## Staff

Staff may wear smart watches, but must adhere to the above guidance when using them in front of children.

## Pupils

Pupils are permitted to wear smart watches, but must adhere to the following guidelines:

- The watch must not be connected to the Internet or WiFi.
- The watch must not be paired with a phone while in school.
- Notifications and walkie talkie mode must both be disabled.
- The watch is not to be used in lessons (apart from reading the time) or act as a distraction and must be kept on silent throughout the day
- Hatherop Castle School does not accept any responsibility for the theft, loss of, or damage to, these devices and parents need to understand that such devices are expensive and can be prone to damage.



- Any children wearing a smart watch or activity tracker style watch will be asked to remove it for sport and physical activity in the interest of pupil safety – particularly for contact sports. Staff will be able to look after the watches in these occasions, but like the school, do not accept any responsibility for the theft, loss of, or damage to, these devices.

## Volunteers, Visitors, Governors and Contractors

All Volunteers, Visitors, Wishford personnel and Contractors are expected to follow our mobile phone policy as it relates to staff whilst on the premises. On arrival, such visitors will be informed of our expectations around the use of mobile phones.

## Parents

Parents are requested not to use their mobile phones while in school. Phones should be on silent and out of sight.

We do however allow parents to photograph or video school events such as shows or sports days using their mobile phones – but **insist that parents do not publish images (e.g. on social networking sites) that include any children other than their own.** This is outlined in detail at Appendix 1.

## Dissemination

The mobile phone policy will be shared with staff and volunteers as part of their induction. It will also be available to parents via the school office and website.



## Appendix 1 - Guidance on the use of photographic images and videos of children in schools

This appendix is updated regularly to reflect changes in safeguarding expectations and the Data Protection Act. Any problems in our school Can be avoided by everybody following this policy.

There are 2 main areas of concern:

### Safeguarding concerns

- The potential for inappropriate use/adaptation of images for use on child pornographic websites.
- The possible identification of young people, especially where the photograph is accompanied by additional information.

### Data Protection Concerns

- Whether taking photographs or videos of children in school by parents, staff or others could breach data protection regulations.

### Data Protection Issues

The question is often asked as to whether parents/carers can take photographs or make video recordings of nativity plays and similar school events. Parents/carers are not required to comply with the Data Protection Act 1998 when taking photographs for their own private use of their children at an organised event.

Parents/carers are not permitted however to take photographs or to make a video recording for anything other than their own personal use. They would not, for example, be permitted to sell videos of a school event, (unless authorised/commissioned to do so by the Headteacher/Wishford Schools for the purpose of fundraising on behalf of the school and in a fashion that had already met the requirements for such sales). Recording and/or photographing other than for private use would require the consent of all the other parents/carers whose children may be included in the images. To make sales or pass copies on without this could be a breach of the Data Protection Act 1998.

The school will determine whether to allow videos or photographs to be taken by parents/ carers during the event, and parents will be informed accordingly. It will be made clear from the start that any images taken must be for private use only and if they include others, they must not be put on the web/internet without their consent; otherwise Data Protection legislation may be contravened.

### Recommended Good Practice

The Data Protection Act is unlikely to apply in many cases where photographs are taken in schools and other educational institutions. Fear of breaching the provisions of the Act should not be wrongly used to stop people taking photographs or videos which provide many with much pleasure.

Where the Act does apply, if the photographer asks for permission to take a photograph, this will usually be enough to ensure compliance;

- Photos taken for official school use may be covered by the Act and pupils and students should be advised why they are being taken.
- Photos taken purely for personal use are exempt from the Act.

### Personal Use

A parent takes a photograph of their child and some friends taking part in the school Sports Day to be put in the family photo album. These images are for personal use and the Data Protection Act does not apply.





## Official School Use

Photographs of pupils or students are taken for building passes. These images are likely to be stored electronically with other personal data and the terms of the Act will apply.

A small group of pupils are photographed during a science lesson and the photo is to be used in the school prospectus. This is unlikely to be personal data and the Act wouldn't apply.

## Media Use

A photograph is taken by the local newspaper of a school awards ceremony. This is unlikely to be covered by the Act. Even if it were covered, personal data processed for journalistic purposes are exempt from the main provisions of the Act. However, as there may be concerns in individual cases about pictures appearing in the press, it would be good practice for schools to advise people that the press will be attending certain events.

## Safeguarding concerns and recording images of young people

There have been concerns about the risks posed directly and indirectly to young people through the use of photographs on websites and other publications.

Therefore, the following guidelines are suggested:

- All young people featured in photographs/recordings must be appropriately dressed, a minimum of vest/shirt and shorts.
- The recording should ideally focus on the activity. Where possible, images of children/young people should be recorded in small groups (the group may comprise any combination of adults and children).
- Staff should be allowed to use video equipment as a legitimate learning aid and means of recording special occasions. However, care should be taken in the dissemination and storage of the material. Whenever possible school owned equipment will be used and not personal devices.
- Try to take photographs that represent the diverse range of youngsters participating safely in activities. This might include:
  - Boys and Girls
  - Young people from minority ethnic communities
  - A range of clothing, e.g. tracksuit/jogging trousers
  - Girls with hair covered – a baseball cap will do
  - Disabled people
  - Glasses – okay if not actually playing at the time
  - Shin pads must be on if they are recorded playing.
  - Jewellery should be off in all images.

## Use of Photographic/Filming Equipment by Parents and Spectators

If parents or other spectators are intending to photograph or video at an event, they will also be made aware the expectations:

- Parents and spectators should be prepared to identify themselves, if requested, and state their purpose for photography/filming.
- Participants and parents should be informed that if they have concerns about inappropriate or intrusive photography/filming, these should be reported to the event organiser or official and recorded in the same manner as any other child protection concern.



- Event organisers should approach and challenge any person taking photographs who has not made his/herself known and/or registered with them. They might need to refer it to the local police force if this person continues to record images unauthorised.

### Publishing Images of Young People

- If a photograph/recording is used, personal details of young people such as email address, home address and telephone numbers should not be revealed.
- Ask for parental/carers permission to use an image of young person. Parents/carers are aware of the way the image of their child is representing. Parents/carers have opportunity to opt out of this.
- Ask for the young person's permission to use their image. This ensures that they are aware of the way the image is to be used. A Parent/Guardian and Young Person Permission Form is the best way of achieving this.
- Where a story concerns an individual (e.g. their selection for county teams, triumph over adversity), particular attention should be paid to ensuring permission is gained from a parent/guardian and the young person to use a photograph/recording and relevant details.
- In order to guard against the possibility of a young person under a court order appearing on a website, the simultaneous streaming of images onto a website is not permitted. Delayed streaming also provides an opportunity for the editing of inappropriate clips (e.g. disarranged clothing).
- Think about the level of consideration that you give to the use of images in all publications, e.g. the processes used in choosing photographs for a publicity brochure for the school. Apply an increased level of consideration to the images of youngsters used on websites. Simple technology features such as watermarking may dissuade third parties from using or attempting to access controlled imagery.

### Summary

Protecting the welfare of young people is about putting in place the best possible practices and procedures; this will protect not only young people but also the adults involved.

### Parental Consent

Parental consent is sought from parents regarding the use of any photographs or videos of their children for various purposes, including marketing. The following statement is included on the acceptance form:

- We would like to ask for permission to take images of your child. As well as for administrative and child-safety purposes, images are also used in year books, prospectuses, school website, news articles and on our social media platforms. We never name children and the vast majority of parents enjoy the opportunity to see the exciting experiences their children have at school. Permissions can be reviewed any time by contacting the School Office.
- Please confirm that you are happy for images and videos of your child to be used. (A Yes or No tick box then appears).
- If you answered no, the School Office may contact you to discuss these provisions. It may be that your child has to be excluded from some photo/video opportunities or pixelated out of the images.



## Appendix 2.1 – Permission for staff to record or photograph children with personal devices in boarding.

Staff member \_\_\_\_\_

I understand the implications and requirements incumbent upon me if I am to use my personal mobile device to capture images or recordings of pupils. In doing so, I agree to the following terms and conditions:

- The use of a personal device should be a last resort; it should only be used if a school device is not available at that time. This may include a spur of the moment opportunity to capture a good photograph, which may be missed were a school device to be sourced.
- The images of the child must be deleted from the device and any personal cloud storage within 48 hours of being captured. To protect yourself it would be highly recommended that you delete these photos in front of a senior member of staff.
- No phones should be used or photos taken in the dormitories or shower facilities.
- The capture or recordings/images must be justifiable, for work purposes, appropriate for the context, and in line with the safeguarding requirements in this policy.
- Should an inappropriate image or video be captured inadvertently, it must be deleted immediately and a disclosure made to the Headmaster.
- I agree to surrender my phone for inspection at the request of a member of the school's Senior Leadership Team, and will unlock the device if necessary, in order that they can confirm that images have been deleted.
- The permission to use a personal device to capture images or recordings does not apply to EYFS pupils, for which only school-owned devices can be used.
- The permission to use personal devices to capture images or recordings does not apply to pupils from other schools, unless such permission has been granted in writing by their Headmaster or Principal.
- Permission has been granted by the Headmaster, by him signing the form below.

Staff member

Authorised by the Headmaster

Signed \_\_\_\_\_

Signed \_\_\_\_\_

Date \_\_\_\_\_

Date \_\_\_\_\_



## Appendix 2.2 – Permission for staff to record or photograph children with personal devices in the Sports Department.

Staff member \_\_\_\_\_

I understand the implications and requirements incumbent upon me if I am to use my personal mobile device to capture images or recordings of pupils. In doing so, I agree to the following terms and conditions:

- The use of a personal device should be a last resort; it should only be used if a school device is not available at that time. This may include a spur of the moment opportunity to capture a good photograph, which may be missed were a school device to be sourced.
- The images of the child must be deleted from the device and any personal cloud storage within 48 hours of being captured. To protect yourself it would be highly recommended that you delete these photos in front of a senior member of staff.
- No phones or photos taken in the changing rooms or shower facilities.
- No photos should be taken on personal devices when children are swimming.
- When taking photos of children in matches, try to avoid taking photos of the opposition school.
- The capture or recordings/images must be justifiable, for work purposes, appropriate for the context, and in line with the safeguarding requirements in this policy.
- Should an inappropriate image or video be captured inadvertently, it must be deleted immediately and a disclosure made to the Headmaster.
- I agree to surrender my phone for inspection at the request of a member of the school's Senior Leadership Team, and will unlock the device if necessary, in order that they can confirm that images have been deleted.
- The permission to use a personal device to capture images or recordings does not apply to EYFS pupils, for which only school-owned devices can be used.
- The permission to use personal devices to capture images or recordings does not apply to pupils from other schools, unless such permission has been granted in writing by their Headmaster or Principal.
- Permission has been granted by the Headmaster, by him signing the form below.

Staff member

Authorised by the Headmaster

Signed \_\_\_\_\_

Signed \_\_\_\_\_

Date \_\_\_\_\_

Date \_\_\_\_\_



## Appendix 2.3 – Permission for staff to record or photograph children with personal devices for events/activities.

Staff member \_\_\_\_\_

I understand the implications and requirements incumbent upon me if I am to use my personal mobile device to capture images or recordings of pupils. In doing so, I agree to the following terms and conditions:

- The use of a personal device should be a last resort; it should only be used if a school device is not available at that time. This may include a spur of the moment opportunity to capture a good photograph, which may be missed were a school device to be sourced.
- The images of the child must be deleted from the device and any personal cloud storage within 48 hours of being captured. To protect yourself, it would be highly recommended that you delete these photos in front of a senior member of staff.
- The capture or recordings/images must be justifiable, for work purposes, appropriate for the context, and in line with the safeguarding requirements in this policy.
- No mobile phones should be used or photos taken in changing rooms, dormitories or bathroom facilities.
- Should an inappropriate image or video be captured inadvertently, it must be deleted immediately and a disclosure made to the Headmaster.
- I agree to surrender my phone for inspection at the request of a member of the school's Senior Leadership Team, and will unlock the device if necessary, in order that they can confirm that images have been deleted.
- The permission to use a personal device to capture images or recordings does not apply to EYFS pupils, for which only school-owned devices can be used.
- The permission to use personal devices to capture images or recordings does not apply to pupils from other schools, unless such permission has been granted in writing by their Headmaster or Principal.
- Permission has been granted by the Headmaster, by him signing the form below.

Staff member

Authorised by the Headmaster

Signed \_\_\_\_\_

Signed \_\_\_\_\_

Date \_\_\_\_\_

Date \_\_\_\_\_



## Appendix 2.4 – Permission for staff to record or photograph children with personal devices on Trips.

Staff member \_\_\_\_\_

I understand the implications and requirements incumbent upon me if I am to use my personal mobile device to capture images or recordings of pupils. In doing so, I agree to the following terms and conditions:

- The use of a personal device should be a last resort; it should only be used if a school device is not available at that time. This may include a spur of the moment opportunity to capture a good photograph, which may be missed were a school device to be sourced.
- The images of the child must be deleted from the device and any personal cloud storage within 48 hours of being captured. To protect yourself, it would be highly recommended that you delete these photos in front of a senior member of staff.
- The capture or recordings/images must be justifiable, for work purposes, appropriate for the context, and in line with the safeguarding requirements in this policy.
- Photos should not be taken in bathroom facilities or sleeping areas such as tents when on Cumulus.
- Photos should only be taken of Hatherop Castle children and ideally in groups rather than individual photos.
- Should an inappropriate image or video be captured inadvertently, it must be deleted immediately and a disclosure made to the Headmaster.
- I agree to surrender my phone for inspection at the request of a member of the school's Senior Leadership Team, and will unlock the device if necessary, in order that they can confirm that images have been deleted.
- The permission to use a personal device to capture images or recordings does not apply to EYFS pupils, for which only school-owned devices can be used.
- The permission to use personal devices to capture images or recordings does not apply to pupils from other schools, unless such permission has been granted in writing by their Headmaster or Principal.
- Permission has been granted by the Headmaster, by him signing the form below.

Staff member

Authorised by the Headmaster

Signed \_\_\_\_\_

Signed \_\_\_\_\_

Date \_\_\_\_\_

Date \_\_\_\_\_



## Appendix 3 – Boarders’ Mobile Phone Agreement

I understand that bringing a mobile phone into school is a privilege, and I must follow a number of rules to be allowed to use it. I therefore agree to the following:

- I understand that the rules below are for my safety. I understand that the school wants to give me freedom, while also giving me enough security to make smart choices.
- I will hand my phone/tablet into the boarding staff as soon as it is brought into school.
- When I am given the phone to use in the evening, I will hand it back by the specified time, without staff needing to come and get it from me, and it will be turned off when I give it back.
- On a normal school evening, I will not use my phone for any purpose other than phoning my family.
- When I am allowed to use my phone/tablet to play games (Wednesdays and the weekend), they must be age appropriate games according to the Apple App Store or Android Store.
- I am responsible for collecting my phone before I leave school for the weekend, or at the end of term.
- I will not take photographs or videos of people without their consent, and never when they are getting changed.
- I will not send or willingly receive naked photos. Ever. I understand that there could be serious legal consequences in doing so, and it could even lead to me being expelled from the school. If I receive a naked photo, I will report it immediately.
- I understand that my behaviour on my phone can impact my future reputation – even in ways that I am not able to predict or see.
- I will tell staff if I receive suspicious or alarming phone calls or messages from people I don’t know. I will also tell staff if I am being harassed by someone through my mobile phone (including phone calls, messages or through any apps).
- I will NEVER use my phone to bully or tease anyone, even if my friends think it’s funny.
- I will not charge or use my phone in my dormitory; and only use my phone in communal areas.
- I will only connect the phone to the internet using the school’s WiFi, logging into Hatherop Personal, using your username and password. You must not connect to the internet via 4G.
- I will not install or use a VPN application on my device. If a VPN is already installed, I will delete it.
- I agree that the school has the right to confiscate or search a mobile phone, without my permission. In the unlikely event of needing to do this, the school will endeavour to contact a parent or guardian. If asked to do so, I will unlock the phone for the staff member.
- I understand that the school does not accept responsibility for damage or loss of a mobile phone brought into school.
- If I break these rules, the privilege to use my phone may be withdrawn, and in escalation, I may not be allowed to bring a phone into school at all.

Signed \_\_\_\_\_

Name \_\_\_\_\_

Date \_\_\_\_\_

Version: 1.4  
Dated: October 2023  
Next review: November 2024



