



## ST LAWRENCE COLLEGE JUNIOR SCHOOL including EYFS

### 7i (Use of) Mobile Phone, Electronic Device and Cameras (MPED&C) Policy

#### 1. Policy aims and scope

- This policy takes into account the DfE statutory guidance 'Keeping Children Safe in Education' 2023, Early Years and Foundation Stage 2024 and 'Working Together to Safeguard Children' 2022 and the local Kent Safeguarding Children Multi-agency Partnership (KSCMP) procedures.
- The purpose of this policy is to safeguard and promote the welfare of all members of the Junior School community when using mobile devices and smart technology.
  - The Junior School recognises that online safety is an essential part of safeguarding and acknowledges its' duty to ensure that all pupils and staff are protected from potential harm when using mobile and smart technology.
  - As outlined in our Safeguarding Child Protection Policy, the Designated Safeguarding Lead (DSL), is recognised as having overall responsibility for online safety.
- This policy applies to all access to and use of all mobile and smart technology on site; this includes mobile phones and personal devices such as tablets, e-readers, games consoles and wearable technology, such as 'smart' watches and fitness trackers, which facilitate communication or have the capability to record sound or images.
- This policy applies to pupils, parents/carers and all staff, including the Governors, leadership team, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for, or provide services on behalf of the school (collectively referred to as "staff" in this policy).

#### 2. Links with other policies

This policy links with several other policies, practices and action plans, including but not limited to:

- Anti-bullying policy
- Acceptable Use Policies (AUP)
- Good Behaviour policy
- Cameras and image use policy
- Safeguarding child protection policy
- Staff code of conduct
- Whistle Blowing policy
- Curriculum policies, such as: Computing, SHEEP (PSHE) and Relationships Education
- Data security
- EYFS Policy

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### 3. Safe use of mobile and smart technology expectations

- We recognise that use of mobile and smart technologies is part of everyday life for many pupils, staff and parents/carers.
- Electronic devices of any kind that are brought onto site are the responsibility of the user. All members of the school community are advised to:
  - take steps to protect their mobile phones or personal devices from loss, theft or damage; we accept no responsibility for the loss, theft or damage of such items on our premises.
  - use passwords/PIN numbers to ensure that unauthorised access, calls or actions cannot be made on their phones or devices.
- Mobile phones and personal devices (including smart watches with wifi and cameras) are not permitted to be used in specific areas on site, such as changing rooms, toilets and swimming pools. Staff may not use mobile phones in the pupils' boarding bedrooms unless to call the medical centre or an ambulance in an emergency.
- The sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the community; any breaches will be dealt with in line with our anti-bullying, behaviour and child protection policies.
- All members of our school are advised to ensure that their mobile phones and personal devices do not contain any content which may be offensive, derogatory or illegal, or which would otherwise contravene our behaviour or safeguarding child protection policies.

### 4. School provided mobile phones and devices

- Members of staff who need contact with our Boarding families will be issued with a work phone number in addition to their work email address, to allow direct contact with families when required.
- All other staff should restrict contact with parents to emails via the school office email address, or school landline phones and not use their personal mobile phones for conversations.
- Google Classroom has provided a platform for communication directly between parents and staff. Staff should be circumspect with this and only reply during the school day and only with regards to the online teaching and learning content. Other matters such as pastoral concerns should be directed through the formal school office channel. Staff providing formal remote learning on Google Classroom will do so using school equipment in accordance with our acceptable use policy and remote learning guidelines.
- School mobile phones and devices will be suitably protected via a passcode/password/PIN and must only be accessed or used by members of staff or pupils under direct supervision of a member of staff.
- Mobile phones and devices will always be used in accordance with the acceptable use of technology policy.

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- Where staff and/or pupils are using school mobile phones or devices, they will be informed prior to use via our Acceptable Use Policy (AUP) that activity may be monitored for safeguarding reasons and to ensure policy compliance.
- Staff with smart watches must not use these during any times when with children.

## 5. Staff use of mobile and smart technology

- Members of staff will ensure that use of any mobile and smart technology, including personal phones and mobile devices, will take place in accordance with the law, as well as relevant SLC policy and procedures, such as confidentiality, child protection, data security, staff code of conduct and Acceptable Use policies.

Staff will be advised to:

- Keep mobile phones and personal devices in a safe and secure place (e.g. in a drawer or personal bag) during lesson time.
- Keep personal MPED&C switched off or set to 'silent' mode during lesson times.
- Ensure that Bluetooth or other forms of communication, such as 'airdrop', are hidden or disabled during lesson times.
- Not use personal devices during teaching periods unless permission has been given by the Head of Junior, Head of Pre-Prep or Deputy Head, such as emergency circumstances.
- Ensure that any content bought onto site via personal mobile phones and devices is compatible with their professional role and our behaviour expectations.
- Members of staff are not permitted to use their own personal phones or devices for contacting pupils or parents and carers.
  - Any pre-existing relationships or circumstance, which could compromise staff's ability to comply with this, will be discussed with one of the DSLs.
- Staff will only use school provided equipment (not personal devices):
  - to take photos or videos of pupils.
  - to work directly with pupils during lessons / educational activities.
  - to communicate with parents/carers.
- Where remote learning activities take place, staff will use school provided equipment. If this is not available, staff will only use personal devices with prior approval from the Head of Junior School. Staff will follow clear guidance outlined in the Acceptable Use Policy and/or remote learning AUP. Google Classroom live interactions with pupils will be recorded and stored in a communal area to protect both staff and pupils.
- If a member of staff breaches our policy, action will be taken in line with our staff code of conduct policy.
- If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device or have committed a criminal offence using a personal device or mobile phone, the police will be contacted and the LADO (Local Authority Designated Officer) will be informed in line with our

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allegations policy.

## 6. Pupils use of mobile and smart technology

- Pupils will be educated regarding the safe and appropriate use of mobile and smart technology, including mobile phones and personal devices, and will be made aware of behaviour expectations and consequences for policy breaches.
- Safe and appropriate use of mobile and smart technology will be taught to pupils as part of an embedded and progressive safeguarding education approach using age-appropriate sites and resources. Further information is contained within our safeguarding and child protection and relevant specific curriculum policies e.g. SHEEP and Computing.
  - Mobile phones and/or personal devices including smart watches will not be used on site by pupils, unless permission granted by the SENDCo on the basis of supporting their learning during specified lessons only.
  - If a pupil requires access to a personal device in exceptional circumstances, for example medical assistance and monitoring e.g. a child with diabetes to aid rapid communication with parents and care teams, this will be permitted. The pupil will be restricted from using any such device for any purpose other than medical need.
  - Mobile phones or personal devices will not be used by pupils during lessons or formal educational time, unless as part of an approved and directed curriculum-based activity with consent from a member of staff and with parental consent.
  - The use of personal mobile phones or devices for a specific education purpose does not mean that blanket use is permitted.
  - Staff will only allow pupils to use their mobile phones or personal devices as part of an educational activity, following a risk assessment, with approval from the Head of Junior School.
  - On the very rare occasion that pupils may bring in their personal device for educational or celebratory purposes (e.g. Year 6 Leavers' events) these must be kept safe and secure and only used when under close supervision of staff.
  - If a pupil needs to contact their parents or carers whilst on site, they will be allowed to use the office phone, or a staff work phone if off site.
  - Parents are advised to contact their child via the school office; exceptions may be permitted on a case-by-case basis (for example for boarders whose families may be living in a different time zone), as approved by the Head of Junior School.
- Where pupils' mobile phones or personal devices are used to access Google Classroom, this will be in accordance with our Acceptable Use Policy and Good Behaviour Policy.
- Mobile phones and personal devices must not be taken into examinations. Pupils found in possession of a mobile phone or personal device which facilitates communication or internet access during an exam will be reported to the appropriate examining body. This may result in the withdrawal from either that examination or all examinations.

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- Any concerns regarding pupils' use of mobile technology or policy breaches will be dealt with in accordance with our existing policies, including anti-bullying, safeguarding child protection and good behaviour.
  - Staff may confiscate a learner's mobile phone or device if they believe it is being used to contravene our safeguarding child protection, behaviour or anti-bullying policies.
  - Searches of mobile phone or personal devices will be carried out in accordance with our policy. Action by staff will be in line with the DfE '[Searching, Screening and Confiscation](#)' guidance.
  - Pupils' mobile phones or devices may be searched by a member of the leadership team, with the consent of the pupil or a parent/carer. Content may be deleted or requested to be deleted if it contravenes our policies.
  - Appropriate sanctions and/or pastoral/welfare support will be implemented in line with our Good Behaviour policy.
  - Concerns regarding policy breaches by pupils will be shared with parents/carers as appropriate.
  - Where there is a concern that a child is at risk of harm, we will contact / respond in line with our safeguarding child protection policy.
  - If there is suspicion that material on a pupils' personal device or mobile phone may be illegal, or may provide evidence relating to a criminal offence, the device will be handed over to the police for further investigation.
  - The Team are aware of the risks of sexual harassment between pupils, the risk of sharing of indecent images or harmful content between children. Staff have regular training updates via the annual safeguarding online training and weekly updates. These risks are mitigated by all pupils handing in their mobile phones to the school office for the duration of the school day. The risks are further mitigated by regular communication and advice to parents regarding online safety including links on the school website via the Learning Website page. Further details can be found within the main Safeguarding Policy. The children are taught about their responsibilities online via SHEEP lessons and the annual NSPCC Share Aware training days support children in an age-appropriate way, to know about what to do if they have concerns or something or someone makes them feel uncomfortable.

### **In the Boarding Department**

Boarders' mobiles must be kept in the boarding house.

At the discretion of the Boarding House staff, controlled use of mobiles / devices may be made by pupils, to communicate with their family members, or for playing games, during the evenings and at weekends, this is always time limited.

It is permissible for boarding staff to use personal mobiles/devices at suitable times, provided:

They are *not* used to take photographs;

They are *not* used to communicate with pupils;

They are *not* used in the bedrooms;

Internet-enabled devices are used within the bounds of the school's Staff ICT Acceptable Use Policy.

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Boarding pupils' phones will be regularly monitored to ensure all Apps and Games are age appropriate. Two members of staff will be present with a pupil, whilst their devices are reviewed. If any member of staff has a concern they will safely confiscate the device and parents will be notified. The matter will be reported as an incident to the Deputy Head, Junior School via CPOMS and orally at the next opportunity.

Mobile phones and devices that have been confiscated will be held in a secure place and released to parents/carers or returned to the Boarding pupil after parents informed and any issues resolved, blocked or deleted.

## **7. Visitors' use of Mobile Phone, Electronic Devices and Cameras**

- Parents/carers and visitors, including volunteers and contractors, are expected to ensure that:
  - use of mobile phones and personal devices by visitors and contractors are only permitted within specific areas when there are SLC staff in direct line of sight and the member of staff overseeing the visitors gives permission. For example a contractor will need to ask permission from the Facilities team and a parent may only use a device during an event for which the organiser details in advance or at the start, when photography and recording is permitted.
- Appropriate signage and information is in place to inform visitors of our expectations for safe and appropriate use of personal devices and mobile phones.
- Parents may take photographs at school events, or when accompanying pupils on school trips, except in the following circumstances:
  - No photographs may be taken whilst children are changing for an activity, or in any of the school changing rooms, or whilst swimming.
  - Photographs must not be taken during performances of school plays, productions or concerts without the express permission, prior to the performance, of the production Director or member of the Senior Leadership Team. If photography is permitted, parents and guests should take care to avoid distracting pupils and the audience. Parents are permitted to take photographs or video footage, these must be strictly for private family use only. Photos and videos taken by parents should not be shared elsewhere (e.g. posted on social media site), to do so may breach intellectual property rights, data protection legislation and importantly may place members of the community at risk of harm.
- Video or sound recording of a copyright musical or theatrical performance is restricted to the school's authorised filming crews.
- Parent volunteers will be informed about this policy and expectations regarding their use of personal devices etc will be as per a member of staff.
- Visitors, including volunteers, who are on site for regular or extended periods of time are expected to use mobile and smart technology in accordance with our acceptable use of technology policy and other associated policies, including safeguarding child protection.

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- If visitors require access to mobile and smart technology, for example when working with pupils as part of multi-agency activity, this will be discussed with the Head of Junior School prior to use being permitted.
  - Any arrangements regarding agreed visitor access to mobile/smart technology will be documented and recorded by the SENDCo if directly working with pupils and by the Facilities Manger if a contractor. This may include undertaking appropriate risk assessments if necessary.
- Members of staff are expected to challenge visitors if they have concerns about their use of mobile and smart technology and will inform the DSL or a member of SLT of any breaches of our policy.

Mobile phone use for contractors engaged by the Facilities Department for all non-student related activities should ensure the use of phones, electronic devices are kept to minimum whilst on working on the SLC site and:

- Is for work related purposes only including lone working and agreed health and safety procedures;
- conversations are held in a private area as identify by the FM;
- photographs, video recordings of staff or students is not permitted under any circumstances;
- all photos or recordings of buildings, equipment, machinery, or the grounds are not to include an image of any student or staff member;
- if a contractor is found or suspected of recording or photographing students or have committed a criminal offence using a personal device or mobile phone, the police will be contacted and the LADO (Local Authority Designated Officer) will be informed in line with our allegations policy.

## 8. Use of Images

- On signing the Acceptance Form when their children enter the school, parents agree to abide by the school's Terms and Conditions. These Terms and Conditions (Section 30) confirm that photographs/images of pupils taken in school may be included in the school's promotional material and on the school's website.
- No photograph of a pupil will be published that includes the pupil's full name without the parent's consent.
- Where parents have expressly asked for their child's image not to be used in the media, they should make their child aware and should write to the Head of the Junior School, requesting an acknowledgement of the letter.

## Policy monitoring and review

- Technology evolves and changes rapidly. SLC Junior School will review this policy at least annually. The policy will be revised following any national or local policy updates, any local concerns and/or any changes to our technical infrastructure.

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- We will regularly monitor internet use taking place via our provided devices and systems and evaluate online safety mechanisms to ensure that this policy is consistently applied. Any issues identified will be incorporated into our action planning.
- All members of the staff community will be made aware of this policy and will fall under the safeguarding topic for weekly staff meetings.

## 9. Responding to policy breaches

- All members of the community are informed of the need to report policy breaches or concerns in line with existing school policies and procedures. This includes: Safeguarding child protection and Good Behaviour policies.
- After any investigations are completed, leadership staff will debrief, identify lessons learnt and implement any policy or curriculum changes, as required.
- We require staff, parents/carers and pupils to work in partnership with us to resolve issues.
- All members of the community will respect confidentiality and the need to follow the official procedures for reporting concerns.
- Learners, parents and staff will be informed of our complaints procedure and staff will be made aware of the whistleblowing procedure.
- If we are unsure how to proceed with an incident or concern, the DSL (or a deputy) or *a member of SLT* will seek advice from the [Education People’s Education Safeguarding Service](#) or other agency in accordance with our child protection policy.

## 10. Data Protection

All images taken by the school will be used in a manner compliant of the eight Data Protection Principles (Data Protection Act 2018, GDPR & EYFS Framework). This means that images will be:

- 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

## 11. Key Details

Designated Safeguarding Lead (s): Ellen Rowe Head of Junior School, Deputy DSL Robin Perry Deputy Head, Deputy DSL EYFS Sarah Peskett and Deputy DSL Boarding Linda Morgan

Named Governor with lead responsibility: Melissa Millin

**Date written/updated: August 2023**

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**Date agreed and ratified by Governing Body: (PWG)**

**Date of next review: (January 2025)**

This policy will be reviewed **at least** annually. It will also be revised following any concerns and/or updates to national and local guidance or procedures.

## REVISION HISTORY

Version No	Revision Date	Summary of Change	Approved by	Updated by
1.1		This is a completely new version of a previous policy. It has had a major overhaul in the light of developing technology, Google Classroom and KCSIE 2022. It is based on the Education People's mobile and smart technology policy template.	PWG	ER
1.2	20/3/23	Addition of mitigation against sexual harassment / sharing of indecent images / harmful content. References to KCSIE 2022. Covers how staff, pupils and parents are trained.	PWG	ER
1.3	August 23	Updated Government policies and reference to CPOMS	PWG	ER
1.4	January 24	Changes with regards to new EYFS Framework to include smart watches	PWG	ER

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