Safeguarding: Early Years - Use of Mobile Phones and Devices

Colegio Internacional Meres

Europe and USA

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THRIVE IN A RAPIDLY EVOLVING WORLD

1. Terminology

The term 'staff' is used throughout to encompass the following in school:

- Employed adults
- Trainee teachers
- Those representing the Proprietor i.e. Cognita
- Volunteers
- Visitors
- Those on work placements
- Agency staff
- Third parties, including peripatetics, sports coaches, those delivering club/activities, cleaners, caterers, transport workers, and any other form of contractors

2. Purpose

We recognise that staff may wish to have their personal mobile phones on the school site for use in case of emergency. It is acknowledged that staffmay also have other technological devices in their possession or within their personal belongings e.g. tablets.

However, safeguarding of pupils within the school including the Early Years setting is paramount and personal mobile phones and technological devices have the potential to be used inappropriately which may create risk of harm to pupils, staff and other adults. Therefore the setting has implemented the following policy.

3. Relevant Legislation, Guidance, and Regulations

Whilst country specific legislation, guidance and regulations must prevail, this policy is underpinned by the following UK best practice guidance documents:

- Mobile Phones in Schools (2026)
- Early Years Foundation Stage Framework (2025)
- Independent Schoools Standards (2026)
- Keeping Children Safe in Education (latest version)
- British School Overseas Standards
- The Children and Wellbeing Act (2026)
- Online Safety Act (2023)

4. Related Schools Policies

- Staff Code of Conduct
- Safeguarding and Child Protection Policy
- IT Policy
- AI Policy
- Social Media Policy

5. Use of Personal devices by staff

The Safeguarding and Child Protection Policy, IT Policy, and Staff Code of Conduct define and describe the acceptable use of technology and devices for all staff. Their purpose is to establish clear expectations about the safe use of technology for staff and pupils.

All staff are **prohibited** from having/using any personal device capable of capturing or sharing imagery/videos and/or data **in the presence/close vicinity of pupils whether on/off site**: this includes mobile phones, tablets, any Smart devices (including, but not limited to; phones, watches, glasses, and rings/jewellery), hearables/wearables (small electronic devices designed to be worn on the body, often close to the skin, to monitor and relay information about the wearer or their environment in real time). Hearables/wearables also pose risks (other than those related to safeguarding as outlined above) in terms of potential data breaches including 'hacking', unauthorized access, and privacy violations such as surveillance and stalking.

Currently health-related wearables* may potentially be worn, as long as the functionality regarding imagery/videos is disabled whilst the staff member is in school/with pupils off site. Note this position may change with technology advances.

Wearables for medical conditions* will be permitted but must also have the functionality to take imagery/videos disabled.

*Staff using a wearable as outlined above for health reasons /medical conditions must complete a Self-Report (see below) detailing the specific name of the wearable and the reason for requiring it.

Headteachers/Principals **must** confirm in writing (on the SR) that the individual member of staff can use the stated wearable.

Permission to wear such a device will be rescinded if the staff member deviates from the above advice regarding disabling functionality to take imagery/videos.

Communication and correspondence with parents/carers of pupils must only occur using a work email address or work telephone number. No personal emails or devices must be used.

There must be no communication or correspondence with parents/carers of pupils using messaging apps e.g. WhatsApp or through social media platforms e.g. Facebook/Instagram.

Further information can be found in the Personal & Professional Boundaries Policy.

6. Child Sexual Abuse Material (including those that are AI generated) plus Pornography

CSAM

Whether using the school or personal equipment, there are **no circumstances** that will justify staff making, accessing, downloading, possessing, storing, disseminating, or distributing child sexual abuse material i.e. imagery/videos, including those that are AI generated **This is illegal.**

If such content or behaviours as outlined above are found to be discovered to occur at the school, and/or are found on the school's equipment and/or reported by a pupil/parent/carer/other staff member, or a child/adult from outside the school, **an immediate referral** will be made by the Designated Safeguarding Lead (DSL) or Child Protection Co-Ordinator (the latter in Spain only) or their deputies to the Police who will investigate the matter (in the UK, the LADO will also be contacted as per the Safeguarding and Child Protection Policy). Immediate measures will be taken by the school i.e. an internal risk assessment, to ensure that the staff member is not placing any pupils at school at risk whilst the above agencies are investigating the concerns (see Safeguarding and Child Protection Policy). This may involve suspension/the equivalent.

Should a staff member receive such content as described above (from a pupil/parent/carer/other staff member) they must inform their Headteacher/Principal and/or the DSL/CPC (the latter in Spain only) **immediately**. They must **not** view the images/videos, forward the email/images/videos or delete the email/images/videos as **this is illegal**. No contact must be made with the sender of the images/videos until the Headteacher/Principal and/or DSL/CPC (the latter in Spain only) has been informed and safeguarding decisions made, including but not limited to involving the above agencies.

Pornography

Pornography (porn) is explicit content including images or videos used for sexual arousal

(NHS Inform).

Whilst some pornography may be legal in some countries, some is also illegal e.g. extreme pornography (sexual content that is considered violent or life-threatening) and revenge porn.

Under no circumstances must any staff use school equipment to access *any form* of pornography nor access *any form of* pornography on their personal device whilst on the school site/when undertaking school duties off site.

Personal equipment containing pornography or links to it must never be brought into or used in the workplace. Staff must never sell or distribute pornography to pupils, parents/carers or colleagues. It is illegal to do this to under 18s.

All of the above would raise serious concerns about the suitability of the staff member to continue working and will be managed under the Safeguarding and Child Protection Policy.

7. Photography, Videos and Other Images

Staff must **never** use their own personal equipment to take images of pupils at or on behalf of the school whether on or off site, including on educational visits.

Schools must provide school cameras/devices, alongside encrypted memory cards and sticks, to only be used on school cameras for taking photos to be uploaded on social media or for school records.

These school cameras and memory devices must be signed in/out and their use agreed in writing by the Headteacher/ Principal (only) prior to being used.

Staff must ensure that there is parental consent in place for any pupil photographed.

Pupils must not be given the school camera / equipment to take photos of themselves, peers or staff.

Staff should follow the school's agreed policy on photography and use of images of pupils.

Whilst pupil images are regularly used for very positive purposes, staff need to be aware of the potential for these to be taken and/or misused or manipulated, including AI generated for pornographic or 'grooming' purposes.

Particular regard needs to be given when images are taken of young or vulnerable pupils who may be unable to question why or how the activities are taking place.

Images must not be used in the public domain unless parental permission and, where the pupil is over 13, pupil consent has been given.

8. Procedures

School Staff:

1. Staff may not use personal mobile phones or technological devices during working hours. This does not include breaks where personal mobiles may be used off-site or in a safe location such as the staff lounge or work room.
2. Mobile phones and technological devices are kept in locked cabinets, in offices or in the teachers' room. Personal devices are prohibited in early childhood classrooms.
3. If the school's policy is disregarded, staff will receive a verbal warning and a Cause for Concern: Adult form will be completed. In the event of a repeat offense, a written warning will be sent and handled on a case-by-case basis.
4. Staff members ensure that the school's contact details are known to the family and people who may need to contact them in case of emergency.
5. During educational visits, the visitor should carry a school phone. In an emergency, if the school phone cannot be used, staff members can use their personal phone to contact the school and the duty station. When a personal phone has been used, the staff member will fill out a self-report form.
6. In line with our comprehensive child protection policy, if any staff member suspects that material from a mobile phone, camera or technological device is inappropriate and may constitute evidence relating to a criminal offence, staff must immediately inform the Child Welfare and Protection Coordinator.

Staff who refuse to comply with this policy or who are found with an unauthorized personal device (see above) during the school day will face disciplinary action.

Staff are asked to provide the main school number so that they can be contacted in case of emergency during school hours.

For educational visits outside the premises or residential stays, there is a school mobile phone (for use only for calls and text messages) that all those responsible for the visit must carry with them for their exclusive use. In case the device has a camera function, this must be deactivated: no member of staff must reactivate it. Staff members are not allowed to use their personal devices for school matters during outings or stays outside the school and, in case of emergency, the secretary may contact them through the school's mobile phone. This device of the school is regularly monitored and reviewed by the Head of Early Childhood Education to ensure that it is used properly and that it is fully operational. In the event that it is detected that a staff member's mobile phone or technological device contains inappropriate material at the time of receipt (as described above), this must be communicated to the CPC/Management (only), who will take appropriate action.

Staff should also exercise caution when using their personal mobile phones and technology devices outside of working hours. This includes accessing social media, as well as being aware of the risks this poses to themselves and others. This means not contacting or accepting social media requests from parents, students, and ensuring that privacy settings are robust (for more information, see the Staff Code of Conduct, Social Media Policy).

Externals or providers

All third parties visiting or working in the school should be asked to keep their mobile phones, along with those of the staff, in the locked area of the Early Childhood Officer's office throughout their visit. They will only be allowed access when students are not present or in the immediate vicinity; use should be done in the Early Childhood Officer's office and under supervision (due to the need for visitors to be supervised while at school).

We recommend that all "outsiders" provide the main office number for use in case of emergency, as all mobile phones will remain locked away for the duration of your visit.

All other school policies mentioned above are available on the school's website.

Since the school is a COMPLETELY MOBILE-FREE ZONE, the Early Childhood Education department will also place clear signs indicating "no mobile phone zone" and "no camera zone" both outside and inside the building, to remind staff, families and everyone in the school.

Families, guardians and third parties who come to the school and are seen with their mobile phone in sight while moving around the premises (during entry and exit times) will be questioned and asked to remove these devices from the premises immediately. In the event that any child safety and protection concerns arise related to the use of mobile devices on the premises, the centre will apply its Child Safety and Protection Policy.

Authorized images and recordings

Families will be allowed to take photographs occasionally when attending an event at the school. This authorisation must come exclusively from the Management. Families are informed that while they can take photographs and videos of their own children during a performance, these should not be shared on social media and are for their personal use.

In the event that recordings are made by the school – for example, if a school video is produced – permission will be requested before any performance to obtain the consent of the family of all participating students. If permission is refused, all families will be clearly informed of this before the performance takes place.

The iPads used in the Early Childhood Department are intended for staff to collect images of students for the sole purpose of using them in our Learning Diary system or its equivalent, and are used to make observations and entries in the diary. These images are deleted once used and published in the Learning Journal or equivalent. Families have an individual

username and account to access only photographs and videos of their own children. Each class has an assigned iPad for taking photographs. When taking photographs of students with iPads, at least one other member of staff must be present at all times.

We are a school where the use of mobile phones by students is not allowed. In addition, no student is allowed to wear smart devices, including glasses, rings or jewelry, or wearable devices or hearing aids, except for health or medical reasons. In the latter case, written authorization from the Management is required and must be documented in the student's Individual Health Plan.

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