E-Safety Policy

Policy created	01.12.2015	Version number	3.5
Last reviewed	01.11.2026	Next review date	01.11.2027

Scope of policy

The purpose of this policy is to amalgamate the following pre-existing policies in order to ensure all information is consistent and easily accessible:

1. Acceptable Use Policy
2. Confidentiality Policy
3. ICT, Internet and Social Networking Policy
4. Mobile telephone policy

In addition to the incorporation of these policies, the E-Safety Policy shall also include information on sharing of information and data protection.

The overall aim of Plymtree Pre-school's E-Safety policy is to ensure that staff and children will benefit from the technologies offered in a safe environment and through effective usage and management.

Staff and parents/carers should also refer to the **Safeguarding Policy** for relevant information on any of the points covered by this policy.

This policy relates to the legislation, and any amendments, as listed.

Acceptable Usage

The term 'acceptable usage' relates to the use of technology both inside and outside of the setting. This is relevant to staff, committee and parents, as well as children as users of technology. The aim is to recognise:

1. The importance of safeguarding children by promoting the appropriate and acceptable use of information and communication technology (ICT) including mobile phones, cameras, all computers and games consoles.

2. The roles and responsibilities of any users of technology within the setting

3. The roles and responsibilities of users when using technology for purposes relating to Pre-school.

4. To highlight the risks and promote safe and appropriate usage by all technology users

Staff and relevant committee members must agree to and sign an Acceptable Use Agreement prior to commencement in position.

The use of:

- Internet including social networking sites
- E-mails
- Storage of documents, children's records and images
- Cameras and other personal photographic equipment
- Mobile telephones
- Portable electronic devices (such as iPads/laptops)

by any member of staff, volunteer, parent/carer, committee member or visitor of any sort is forbidden in or on Plymtree Pre-school premises inside or on areas outside, including the car park, unless prior permission has been granted by pre-school staff or committee. Any use of the above should be strictly in line with this policy.

Mobile Telephone Usage

Plymtree Pre-school has access to one mobile phone which is kept on site and is turned on during sessions. No landlines are installed and there is no internet access at time of writing.

It is the Setting Manager/Pre-school Leader's responsibility to ensure that the mobile phone remains sufficiently charged at all times, with sufficient credit. The committee should be notified immediately should any issues with the mobile phone arise.

The use of a mobile phone must not detract from the quality of supervision and care of children.

The statutory guidance listed in the Statutory framework for the Early Years Foundation Stage means that providers should take contact telephone numbers and a mobile phone on outings. We do store parents telephone numbers on the pre-school mobile phone.

The safety of children at Plymtree Pre-school is paramount. Casual or inappropriate use of mobile phones by staff may pose a risk if staff are distracted from caring for children. Mobile phone communications with a parent of a child from Plymtree Pre-school is not acceptable other than for approved setting business. In the event that the Emergency Plan is actioned then the use of a personal mobile telephone is acceptable by agreement with the Setting Manager or Pre-school Leader.

Laptop Usage

Plymtree Pre-school has a laptop, held by the Setting Manager. The laptop is for use by the Setting Manager. Other staff may use the laptop with prior consent from the Setting Manager. Children will not have access to the laptop.

The Setting Manager may use the laptop during session and may also take the laptop home. The intent of the laptop is that any information pertaining to the Pre-school is held on the laptop and the Settings Manager is not expected to use their personal PC/device for this.

The laptop will be stored securely at all times when it is not in use, either locked away at Pre-school or in the Setting Manager's home.

The Setting Manager will set up a password which will be shared with the Chair of the Committee. The password should be changed regularly and the Chair of the Committee should be updated each time. If the laptop is left on but not in constant use, the screen should be locked.

The Setting Manager may use the laptop to connect to the Pre-school email account.

Camera, mobile phone and Image Usage

Names and other personal information will not be displayed with photographs of children unless express and informed permission has been given by the parents/carers. Pre-school staff or committee will request permission on every occasion that this may occur, in addition to the annual permission slips.

Plymtree Pre-school has one camera on site for use by Pre-school staff. The mobile phone also has a camera which may be used by Pre-school staff. This section of the policy covers usage of the pre-authorised staff camera and staff mobile telephone.

Staff and other visitors are not permitted to use personal cameras to photograph the children. (Refer to 'Personal Cameras/Mobile phone cameras' below for exceptions.)

Only the Plymtree Pre-school authorised camera may be used to take images and images may only be taken during session times. Parental permission should always be sought to take still and moving images.

Parental consent for use of such pictures should be sought on registration at Pre-school. This should include specific and informed consent to take and use photographs offsite for professional, marketing and training purposes. Individual children will not be named unless we have specific permission from their parents.

The Setting Manager may take the camera/mobile telephone home for the purpose of sharing photos on the pre-school Facebook group or with parents. Permissions are sought on registration of children.

The Safeguarding Designated Officer (SDO) is responsible for memory sticks and storage devices. When taking a memory stick or storage device to be developed offsite, it should be logged in and out by the SDO and monitored carefully to ensure it is returned within the expected time scale.

Personal Cameras/Mobile phone cameras

<u>Staff</u>

The use of a personal mobile telephone/tablet/laptop by any member of staff, volunteer or visitor of any sort is forbidden in or on Plymtree Pre-school premises inside or on areas outside, other than the car park, unless prior and express permission has been given by the Manager or the Pre-school Leader.

The Settings Manager may consult the Committee and such a request may be refused without notice at their discretion. This decision will be made in order to safeguard the children and families at the setting.

In the case of an emergency the Pre-school mobile telephone number is: 07928 786673 and can be given as a way of contacting staff. If contact is unsuccessful on that number Anna Shelbourne (Chairperson) can be contacted on 07947928114 and will be able to arrange for personal contact with the Pre-school. Committee members or staff may photograph the setting and display boards with their personal cameras for use on the website or Facebook page. Children **must not** appear in the photographs taken. This is undertaken with the express permission of the committee and Setting Manager.

Parents/carers and visitors

The use of personal cameras/mobile phone cameras is only acceptable with explicit permission from pre-school staff at pre-school events. Parents/carers will be advised of our E-Safety policy at all such events and will be asked not to post any images (unless the image only contains their own child) on social networking sites or websites.

If visitors wish to use their mobile telephones, they must do so outside in the car parking area. Visitors must not use their mobile telephones in any way within the Pre-school.

All use of a mobile telephone whilst children are present must be recorded by the Designated Safeguarding Officer in the day book, other than use of the normal Pre-school mobile telephone.

The Pre-school staff and committee reserve the right to refuse personal camera usage at any time without prior notice. On such an occasion that permission to photograph children is refused staff or committee members are not required (and in some cases may be unable on the basis of safeguarding) to provide a reason for this decision.

Internet

The internet offers potential for children's learning and development and should only be used for this purpose within the setting. Staff, committee members and parents/carers should be aware of the dangers of the internet and carefully consider their own usage in relation to the setting.

Should ICT users become aware of a potentially unsafe or inappropriate incident taking place the matter should be reported to the SDO or Deputy immediately and a log should be kept of any incidents.

Internet access by staff and children should be managed and monitored at all times on site with the use of secure passwords at all times.

Plymtree Pre-school will ensure the use of up to date virus and built in security into any form of technology used to access the internet, be it by computers, phones, computer games, etc and this will be regularly checked and renewed.

Plymtree Pre-school Website

Plymtree Pre-school has its own website,. The website is intended for use by the general public and any information and/or images displayed will strictly adhere to the guidelines in this policy. The Committee have overall responsibility for the website.

Plymtree Pre-school Email Account

As of September 2013, the Pre-school has had use of an email account – the address is plymtreepreschool@gmail.com. This email address is for use by the Setting Manager and Chairperson, for general enquiries, and other emails relating to the Pre-school.

The password will be changed by the Setting Manager or the Chairperson at least every six months, more if required. The Setting Manager and Chairperson should both be aware of the password, which should not be written down or divulged to any other parties except with the agreement of the Chairperson.

If the Setting Manager forgets the password, or is required to change the password for any reason, they should inform the Chairperson immediately. If any breach of security on the account is suspected the Chairperson should be informed immediately and will decide upon a course of action.

No sensitive information, contact information or images of children or parents will be shared via this email account except where appropriate security measures are put around that data e.g. sending via Egress Secure email.

When using this email account, the user should ensure that they log off completely on completion of use.

Social networking

Plymtree Pre-school operates its own Facebook page for marketing and information purposes. Parents/carers are invited to like the page. Any posts, including photographs will strictly adhere to the contents of this policy. The committee and Settings Manager have responsibility for the Facebook page.

Plymtree Pre-school also have a closed group on Facebook which parents and grandparents of current children can send a request to join. Committee and staff can join this group too. The group is controlled by the Setting Manager. Permission is sought from parents to share photos (without names) on this page on registration at Pre-school.

Facebook privacy settings will be reviewed termly or more frequently if users are made aware of changes to privacy settings.

If personal social networking sites/accounts are used by staff, volunteers, parents/carers or visitors away from the Pre-school setting, there should be no discussion of, or reference to Pre-school, individual children, parents or staff. Confidentiality must always be maintained.

Parents/carers using social media are encouraged to discuss anything they may wish to post to a social media site with the Settings Manager or the committee prior to doing so, in order to safeguard individuals and protect the Pre-school.

Photographs containing children in the Pre-school setting should not be posted in the public domain via any kind of social networking site by staff, volunteers, parents/carers or visitors. This is for the protection of all individuals concerned.

Staff are referred to the Disciplinary Procedure for actions that may be taken by the Pre-school in the event of any breach of this policy.

Confidentiality

The Pre-school's work with children and families will sometimes bring us into contact with confidential information. It is our intention to respect the privacy of children and their families and we aim to ensure that information provided by families in confidence will only be used to enhance the welfare of their children.

There are record keeping systems in place that meet legal requirements; means of storing and sharing information take place within the framework of the General Data Protection Regulation 2018 and the Human Rights Act 1998.

Confidentiality Procedures

To ensure that all those using and working in Pre-school can do so with confidence, we will respect confidentiality in the following ways:

- Parents/carers will have ready access to the files and records of their own child but will not have access to information about any other child. Parents who are not known to the Pre-school may be asked to provide identification and proof of parental responsibility in order to protect the welfare of the child in question.
- Staff will not discuss individual children, other than for purposes of curriculum planning/Pre-school management, with people other than the parents/carers of that child.
- Sensitive or confidential information given by parents/carers to a member of staff will not be passed on to other adults save in accordance with the Pre-school Privacy Notice for Parents. (Refer to Section on Sharing Information for exceptions to this clause.)
- Staff and committee members will not discuss Pre-school or individual children on any social networking internet site, for example, Facebook.
- Issues to do with the employment of staff, whether paid or unpaid, will remain confidential to the people directly involved with making personnel decisions.
- Any anxieties/evidence relating to a child's personal safety will be kept in a confidential file, addressed in accordance with our Safeguarding Policy and will not be shared within the group except in accordance with the Pre-school Privacy Notice for Parents.
- When students are observing in the Pre-school, they will be advised of this Policy and required to respect it. All students will be asked to sign an Acceptable Use Agreement. The Pre-school committee reserves the right to terminate a student placement should Pre-school policies be breached.
- We hold all records securely on site.
- Information (either electronic or physical files etc) will not be removed from site unless the express permission of the Settings Manager has been obtained, and will be returned to site at the following session. The sole purpose of this clause is to allow key workers or the Setting Manager to take information relating to children home in order to plan for subsequent sessions and/or to write up observations or reports. Key workers are required to ensure that such information is not shared with family members and is

kept securely. A failure to take such measures may lead to disciplinary action being taken.

Sharing information

There are circumstances when, notwithstanding confidentiality, we are obliged to share information.

We are obliged to share confidential information without authorisation from the person who provided it or to whom it relates if it is in the public interest. This is when:

- it is to prevent a crime from being committed or to intervene when one may have been committed or
- to prevent harm to a child or adult; and
- not sharing it could be worse than the outcome of having shared it.

The decision should only be taken with the consideration by the Committee of the following:

- where there is evidence that the child is suffering, or is at risk of suffering, significant harm;
- where there is reasonable cause to believe that a child may be suffering, or at risk of suffering, significant harm;
- to prevent significant harm arising to children and young people or serious harm to adults, including the prevention, detection or prosecution of serious crime.

Any other instances when information may need to be shared will be fully explained to children's parents/carers and specific consent sought as appropriate.

We will ensure that any information shared is accurate and up to date, shared only for a specific purpose and only with those who need to know.

Procedures

Our procedure is based on Information Sharing Sept 2026. We also follow the guidance on information sharing from the Local Safeguarding Children Board.

1. Remember that the General Data Protection Regulation 2018 is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately. Our policy and procedures on data protection and information sharing provide guidance to appropriate sharing of information, both within the setting, as well as with external agencies.

2. Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

In our setting we ensure parents:

- are provided with a copy of our Privacy Notice for Parents at the outset of their relationship with Pre-school and at such times as it may be updated during their child's attendance of Pre-school;
- have access to our E-Safety Policy, shown on our website and available in a paper copy in our setting. This will only be when it is a matter of safeguarding a child or vulnerable adult;
- have information about our Safeguarding Policy (also on our website and in a paper copy within our setting); and
- have information about other circumstances when information will be shared with external agencies, for example, with regard to any special needs the child may have or transition to school.

3. Seek advice if you are in any doubt, without disclosing the identity of the person where possible.

- Our staff discuss concerns about a child routinely in supervision and key worker meetings and any actions are recorded and followed up by our Setting Manager.
- Our team routinely seek advice and support from the Setting Manager about concerns regarding possible significant or immediate harm.
- Our Safeguarding Policy sets out the duty of all members of our staff to refer concerns to our Setting Manager or SDO, as designated person, who will contact children's social care for advice where they have doubts or are unsure.
- Our Setting Manager seeks advice if we need to share information without consent to disclose.

4. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.

- We base decisions to share information without consent on judgements about the facts of the case and whether it is 'in the public interest'.
- Our guidelines for consent are part of this procedure.
- Our Settings Manager is conversant with this and she is able to advise staff accordingly.

5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

In our setting we:

- record concerns and discuss these with our designated person and/or designated officer from the management team for child protection matters;
- record decisions made and the reasons why information will be shared and to whom; and
- follow the procedures for reporting concerns and record keeping as set out in our Safeguarding Policy.

6. The processing of any personal data must be necessary, proportionate, relevant, accurate, timely and secure. Ensure that the information you share is necessary for the purpose for

which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

- Our Safeguarding Policy sets out how and where information should be recorded and what information should be shared with other agencies when making a referral.

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Consent

Parents have a right to be informed that their consent to share information will be sought in most cases, as well as the kinds of circumstances when their consent may not be sought, or their refusal to give consent overridden.

- Our policies and procedures set out our responsibility regarding gaining consent to share information and when it may not be sought or overridden.
- Copies are given to parents of the forms they sign.
- Parents are asked to give written consent to share information about any additional needs their child may have, or to pass on child development summaries to the next provider/school.
- We consider the following questions:
    - Is there legitimate purpose to sharing the information?
    - Does the information enable the person to be identified?
    - Is the information confidential? If the information is confidential, do we have consent to share?
    - Is there a statutory duty or court order to share information?
    - If consent is refused, or there are good reasons not to seek consent, is there sufficient public interest to share information?
    - If the decision is to share, are we sharing the right information in the right way?
    - Have we properly recorded our decision?

Consent must be specific, informed and freely given - that is the person giving consent needs to understand why information will be shared, what will be shared, who will see information, the purpose of sharing it and the implications for them of sharing that information.

Consent should be explicit, verbally but preferably in writing. Consent may be withdrawn, subject to any legal obligation we may be under to disclose information irrespective of a withdrawal of consent to process such information.

<u>Separated parents</u>

Consent to share need only be sought from one parent. Where parents are separated, this would normally be the parent with whom the child resides. Where there is a dispute, we will consider this carefully.

Where the child is looked after, we may also need to consult the Local Authority, as ‘corporate parent’ before information is shared.

All the undertakings above are subject to the paramount commitment of the Pre-school, which is to the safety and well-being of the child. Please also see our Safeguarding Policy.

Legal framework

General Data Protection Regulation 2018

Human Rights Act 1998

Further guidance:

- Information Sharing Sept 2026
- What to do if you're worried a child is being abused: Advice for practitioners (HM Government 2015)
- Working together to safeguard children 2026

Breaches of this policy and sanctions

Misuse or incidents relating to ICT should be reported immediately to the Pre-school Leader who should in turn advise the SDO, Chairperson and Named Member of the Committee for Safeguarding to take action. Failure to comply with this Policy may lead to dismissal without notice or payment in lieu of notice.

The provisions above are strict guidelines for anyone within, or visiting, Plymtree Pre-school. Any breach of these provisions will be investigated and dealt with immediately. Members of staff breaching these provisions may face disciplinary action, and in severe cases, dismissal, in line with the Pre-school's Disciplinary Policy.

Where the committee feels it is required, breaches of this policy may be reported to other agencies such as Devon County Council or the Police.

Document History

Date	Change details	Reviewed by
01/12/16	New Policy to incorporate the existing Acceptable Use, Confidentiality, Social Media, Internet & ICT and Mobile Phone Policies. Addition of Policy statement to cover all four policies and any additions. Addition of a procedure on Information Sharing. Paragraph added stating it is Settings Manager responsibility to ensure mobile phone is working & charged with credit.	Rowan Pettitt
03/08/16	Policy Review – grammatical amendments Removed line about parents/carers signing to use a camera at events.	Rowan Pettitt
01/01/2018	Policy reviewed. Added a section on the laptop to the policy (purchased December 2017). Split pre-school mobile phone usage and staff/parent-carer usage for clarity. Added 'mobile phone camera' to the section on camera and image usage. Stipulated that the policy applies to both the pre-	Rowan Pettitt

	authorised staff camera and the mobile phone camera.	
16/05/2018	Deletion of reference to Chair holding contact details for committee/staff on a personal mobile telephone, to ensure compliance with Privacy Notice and Privacy Standard. References to Data Protection Act 1998 replaced with references to General Data Protection Regulation 2018. Consent wording updated to better reflect GDPR requirements. Addition of references to the Privacy Notice for Parents. Play Leader job title changed to Preschool Leader.	Ellie Hibberd
02/10/18	Policy reviewed – Chairperson details updated from Ellie Hibberd to Charlotte Martin and contact details amended accordingly.	Donna Manser
01/10/19	Policy reviewed – Chairperson details updated from Charlotte Martin to Daryl Spicer and contact details amended accordingly.	Donna Manser
06/10/19	Policy in which procedure is based on amended to updated version. Removal of procedure stating parents sign to understand circumstances in which information may be shared without their consent. Policy within legal framework section amended to updated versions.	Clare Livingstone
23/10/20	Policy reviewed – Chairperson details updated from Daryl Spicer to Becky Whitfield and contact details amended accordingly.	Anna Shelbourne
22/09/21	Policy reviewed – no changes	Anna Shelbourne
29/09/22	Policy reviewed – no update	Anna Shelbourne
01/09/23	Policy reviewed – no update	Charlotte Gibbins
01/09/24	Policy reviewed – chair name changed	Charlotte Gibbins
01/10/25	Policy reviewed – Added in various places “permission from parents sought on registration to Pre-school” “The Setting Manager may take the camera/mobile telephone home for the purpose of sharing photos on the Pre-school Facebook group or with parents.” Removed “linked to the village website” Added “sending via Egress Secure email.” Added info re. closed FB group	Clare Livingstone
01/11/26	Policy reviewed - Updated refs to Information Sharing Sept 2026 & Working together to safeguard children 2026	Clare Livingstone