All policies interrelate so please check other policies for pertinent information. Policies are intended to support our philosophy which is summarised in these qualities; Dynamic, Inquisitive, Responsible, Grit, Playful, Contented



## Media and Privacy Policy

Artisans embraces the use of media to support and extend children's learning and to support and extend our ability to track and record their progress. We also recognise that new media forms and availability carry inherent security and confidentiality concerns.

In general these concerns are addressed between a variety of other policy statements and this statement is meant as a synopsis of those.

## Mobile phones

We have a specific policy for these, please refer to that.

#### Laptops and ipads

Artisans has 5 laptops and 8 ipads. These are available for use by any staff member, with the exception of the headteacher's laptop. They should be used on Artisans premises only. When they are used outside of the premises it is the responsibility of the staff member using the equipment to ensure they are in a confidential environment where the data, including possibly photographs, are not overlooked by others. They must gain prior permission from Ruth Martin to take a device off site.

Transportation of these devices is also the responsibility of staff members. They should never be left unattended in any circumstance, including in a locked car. Artisans have a securely locked store and the laptops may be left here. The IPads are always to remain on the premises and are kept in the secure store at night. Ipads are also logged by serial number so that they can be disconnected if lost.

Use of the internet on the laptops is restricted and should only and exclusively be used for research for the purposes of teaching the children or operating Artisans.

The internet connection is private and data is encrypted.

The laptops and ipads are not for personal use.

After using MMC teachers should logout every time.

## Photographs and video recordings

Photographic records of the children's progress and work is a critical part of our record keeping. We also use photographs in our marketing but we never provide the names or any information regarding identity in these cases. If photographs are provided to a third party for the development of marketing materials, they are never identified and the party concerned are always explicitly told that the photos cannot be used for any other purpose. We also use photographs of children within Artisans for displays of the children's work. These displays may be seen by other users of the hall but never contain identity information. Written permission for each of these is obtained or refused separately on registration forms.

Staff contracts contain agreement to their unidentified photos being used in marketing. Their permission is also requested for their photo and first name to be displayed on the staff board; this is done verbally and by their complicit consent in allowing the photos to remain present

Photographs remain the property of Artisans at all times.

Permission to use photographs is considered to be indefinite but Artisans aims never to use photographs more than 8 years old. We often use photos of children who have left rather than current children as a safeguarding precaution.

Staff members should not store photographs or any child details or records on personal media formats. They may use Artisans own memory sticks to store photos for the purposes of report writing and the sticks must be returned to Artisans after use. The sticks cannot be used for any other purpose and photos should never be transferred to other locations. Memory sticks are stored at Artisans under lock and if taken home to write a report should always be locked securely when not in use and password protected.

Only staff members and invited professionals have the right to take photographs and the uses of the photos are restricted as per permissions.

This policy is reviewed annually in the Summer term The lead teacher on this policy is SLT



Photographs may not be taken in any of the following circumstances; when they are upset, having personal hygiene needs met, asleep or have their dignity compromised in any regard. It is potentially possible that in order to record evidence needed to safeguard a child; a situation may arise in which it is considered appropriate to photograph a child in one of the above categories. This can only be done with the explicit consent of two members of leadership at least one of whom must be a designated safeguarding lead and usually only following the advice of social services or the police.

It is anticipated that photographs will continue to be taken by parents during shows and Artisans requests a commitment from parents not to publish the photos any where that is available to the public and only to use them as personal reminders.

Any breach of these codes of conduct regarding the use of media within Artisans will be dealt with by the appropriate disciplinary action.

Photographs of teachers are treated with the same respect and clauses are included in their individual contracts.

## Social networking

Artisans has a closed facebook page on which we post news and photos when permissions have been given. Artisans does not use any other social network sites and any views expressed on such sites are not the recognised views of Artisans.

Employees at Artisans are strongly advised not to use social network mediums to correspond with any parents of children at Artisans in order to protect their professional identity. Any use of social media which could bring disrepute to Artisans is a disciplinary matter.

Images of or from Artisans are not be used on social media sites.

## Data protection

We hold data for the education of our children, the pastoral care of children and staff and for the management of our business systems.

We may share data with other professionals involved in a child's care to assist their development or as a matter of safeguarding. Permission for this is granted by registration forms and by law.

As an organisation registered with the Information Commissioner's Office (ICO) under the Data Protection Act, Artisans follows these principles and we make My Montessori Child as the host of the children' electronic records responsible for following these principles too. Free Agent which we use for our accounting software uses only limited data and is also subject to ICO and GDPR regulations, as are Hertfordshire County Council with whom we share limited data for funding and additional support for individual children when needed. Here are additional details about how each element is implemented.

We publish a fair processing notice to parents claiming external funding.

## ICO compliance

#### (1) USED FAIRLY AND LAWFULLY

We use data for the education and safeguarding of the children, for communication about the children's development with the parents and when given permission we use limited amounts of data for the marketing of Artisans.

#### (2) SPECIFICALLY STATED PURPOSES

We clearly state the specific purposes of the system on our registration form which you sign before being offered a place.

(3) USE IS ADEQUATE, RELEVANT AND NOT EXCESSIVE

Our system's data collection functions are for primarily for educational and safeguarding purposes.

This policy is reviewed annually in the Summer term The lead teacher on this policy is SLT



# (4) THE DATA IS ACCURATE

Our data is collected direct from you and when duplicated onto an electronic data base it is copied as you have presented it.

# (5) DATA HELD ONLY AS LONG AS NEEDED

We keep data for up to ten years so that it can be used to inform later development and you can be contacted to celebrate 10<sup>th</sup> anniversaries of Artisans. Some accident records where a child has needed medical attention in a hospital are required by Ofsted and HSE to be kept for twenty five years.

## (6) DATA PROTECTION RIGHTS

We keep all the data collected strictly confidential. If any parent or teacher wishes to view, correct or delete any data about the children or themselves, they may request the Owner or Head Teacher to access the data and make those changes. There is no information in our system which is not directly accessible by us. (7) SAFE AND SECURE

We follow industry-standard best practices in system security (e.g., encryption, device serial number registration, passwords, user PINs, server centre protections).

## (8) NOT TRANSFERRED OUTSIDE THE UK

The data hosting services of My Montessori Child is located in Manchester, England and no data is stored elsewhere. Free Agent and Hertfordshire County Council also keep all data inside the UK. All transmissions are through fully-encrypted Internet transmissions akin to those used by banks.

## **GDPR** compliance

(1) Awareness.

As a single provision company all relevant staff are fully informed.

(2) Information we hold

We hold the information provided by you at registration and in addition gather observational information about the development of the children which we share with each child's parents both verbally and through My Montessori Child. For staff we hold personal information as recorded on the emergency contact forms and in addition we hold DBS, qualification certificates, bank details, NI numbers and payroll data.

(3) Privacy

We state the privacy terms on the registration forms signed by parents before being offered a place. For teachers we have a privacy statement that is signed before  $25^{th}$  May 2018 or at the commencement of their contract.

(4) Individual Rights

Individuals have a right to: be informed, of access, to rectification, to erasure, to restrict processing, to data portability (only when data processing is automated), to object and not to be subject to automated decision-making. At Artisans none of our data is automated and all data is held on systems accessible to us.

## (5) Subject Access Request

Requests will be responded to within one calendar month. Manifestly unfounded or excessive request may be refused or charged for. Requests will be processed by Senior Leadership.

- (6) Lawful basis of processing As above for ICO
- (7) Consent

This policy is reviewed annually in the Summer term The lead teacher on this policy is SLT



This is provided at the outset of the contract as set out in the registration forms and on staff documentation.

(8) Children

All our children are under the age of consent to use data and consent is therefore sought from those with parental responsibility. We do not offer any information society services (online services for children that collect their data). Consent is verifiable through the registration form.

(9) Data breaches

As a provider of education to children we have to notify all breaches to ICO. Our greatest risk is break in and to mitigate this there are steel shutters, an alarm linked direct to a phone number and additional locks on internal storage. The data is also stored behind all large furniture so impossible to see without significant furniture removal. Allergy data kept in the kitchen contains only one piece of data per child. A breach occurs where two pieces of data are obtained by an unauthorised body. Should a breach occur a full investigation and review will be conducted by senior staff.

# (10) Data Protection Officer

This role is held jointly by senior staff

(11) Data Protection by Design

Artisans has always done this and as a small setting is not high risk. Should a new high risk be introduced a Privacy Impact Assessment would be carried out beforehand by senior staff with reference to the ICO.

## (12) International

We are not an international organisation and do not share data abroad.