MIRASUR SCHOOL

Safeguarding: Early Years - Use of Mobile Phones and Devices

Mirasur School

Europe and USA

September 2026

Registered in England & Wales - Cognita Schools Limited No. 02313425
Registered Office: Seebeck House, One Seebeck Place Knowlhill, Milton Keynes, Buckinghamshire, MK5 8FR

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

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- 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.

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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.

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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

- All staff's personal mobile phones, cameras and technological devices are kept in individual lockers or in the staff room. The use of mobile phones in the presence of students is not permitted.

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

- Staff are asked to supply the main school number for people to contact them in the event of an emergency during school times.

- For off site visits/residentials there is a school mobile phone (to use for calls and text messages ONLY) which all Visit Leaders take with them to use (only). In the event of a photo facility being available, this must be deactivated: no staff member must reactivate it. Staff members are not allowed to use their personal devices for school business on off site/residentials and in the event of an emergency the office would be able to contact them via the school mobile. This school device is monitored and checked on a regular basis to

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ensure appropriate usage and that it is in full working order by the Early Years Lead. In the event that a staff mobile phone or technological device is found to contain unsuitable material on receipt (as outlined above), this must be reported to the DSL/CPC (Spain)/Headteacher/Principal (only) who will take the relevant action.

- Staff must also exercise caution when using their personal mobile phones and technological devices outside of working hours. This includes the accessing of social networking sites, and to be aware of the risks to themselves and others. This includes not contacting or accepting requests on social media sites from parents or pupils and ensuring their privacy settings are robust (for more information see the Staff Code of Conduct and Social Media Policy)

- All 'others' visiting/working the school must be asked to store their mobile phones along with the staff mobiles in the locked area in the Early Years Leads office for the duration of their visit. They would only be allowed access to these when pupils are not present/in the vicinity;use must occur in the office of the Early Years Lead and under supervision (due to the need for visitors to be supervised when in the school).

- We would advise all 'others' to supply the main office number for use in an emergency as all mobile phones would be locked away for the duration of their visit.

- All of the above mentioned other school policies have been made available on the school website

- As we are a total **MOBILE FREE ZONE** the Early Years department will also display clear 'no mobile phone zone' posters and 'no camera zone' around the outside and inside of the building to remind staff, parents/carers and all those in the setting.

- Parents /carers and 'others' to the school that are seen with mobile phones on display whilst moving around the school (during drop off and collection times) **will, and must** be challenged and asked to remove these devices from the premises immediately. Should there be any safeguarding concerns about their use of mobile devices when on the site, the school will follow their Safeguarding and Child Protection Policy.

- Parents/carers will be permitted occasionally to be able to take photos when attending an event in school. This authorisation must come from the Headteacher/Principal(only). Parents/carers are informed that whilst they can take pictures and videos of their OWN children during a performance these are not to be shared on social media sites and they are for their own personal use (only).

- Should school recording take place i.e. in the event of a school video being produced, permission will be sought prior to any performances to seek agreement from parents/carers of all pupils taking part to film their own child. If permission is denied then this will be made clear to all parents/carers before the performance took place.

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- Ipads used in the Early Years department are for staff to collect images of pupils for the purpose of our Learning Journal system/equivalent (only), and used for observations and journal entries. These images are deleted once used and published in the Learning Journal. Parents/carers have an individual log in and account to access their own child's photographs and videos only. Each class has a designated Ipad for their classroom to take pictures of their pupils. When taking photos of pupils using the Ipads, at least one other member of staff must be present at all times.

- We are a mobile free school for pupils. In addition, Smart devices, including glasses, rings/jewellry and wearables/hearables are not allowed to be worn by any of the pupils in school, other than for health/medical conditions. For the latter, this must have written authorisation from the Headteacher/Principal (only) and be documented on the pupil's Individual Health Care Plan.

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