



Mobile Phone, Digital Images & AI-Generated Content Policy This policy ensures safe, appropriate and legally compliant use of mobile phones, digital images and AI generated content across all Munchkin Sports activities. It reflects KCSIE 2026, GDPR, ICO guidance and Ofsted expectations.

1. Mobile Phones – Staff

Staff must keep personal mobile phones switched off or on silent and stored away during sessions.

Phones may not be used in any area where children are present.

Staff may only use phones during designated breaks or in staff-only areas.

Staff must never use personal devices to:

Photograph or film children

Communicate with children

Access social media during sessions

Work devices (if used) must comply with GDPR and be password protected.

2. Mobile Phones – Children

Children may not use mobile phones during wraparound care or holiday camps.

Phones brought from home must remain in bags.

If a child needs a phone for medical reasons (e.g., diabetes monitoring), this must be agreed in advance with parents and recorded.

If a child uses a phone to take photos, videos, or send messages that target another child or an adult, this is treated as a safeguarding concern and escalated immediately.

3. Mobile Phones – Parents/Carers

Parents may take photos only of their own children at weekend clubs.

No photography is permitted at wraparound care or holiday camps.

Parents must not share images of other children on social media.

4. Digital Images – Staff Use

Staff may not take photos or videos of children on personal devices.

Only company-approved devices may be used for authorised marketing or operational purposes.

Written parental consent is required for any image use.

Images must be stored securely and deleted when no longer required.

No images may be shared via WhatsApp or personal messaging apps.

5. Digital Images – Children's Use

Children may not take photos or videos during sessions unless part of a supervised activity.

This includes:

- Photos taken without consent
- Images used to harass or intimidate adults
- Any sexualised or manipulated images involving adults



6. AI Generated Content

Any inappropriate image creation or sharing involving children or adults is treated as a safeguarding concern. Munchkin Sports prohibits the creation, use or distribution of NY AI-generated content involving children or adults, including:

- Deepfakes
- Nudification apps
- Altered or manipulated images
- AI-generated videos or voice clones
- Synthetic media that depicts children in any context

Staff must report any concerns immediately to the DSL.

7. Social Media & Online Conduct

Staff must not post images or information about children on personal social media.

Staff must not “friend”, follow or message children or parents via personal accounts.

Any online safeguarding concern is escalated immediately.

Staff must report any online behaviour by a child that targets another child or an adult, including harassment, threats, or image-based abuse.

8. Data Protection & GDPR

All digital images are processed in line with GDPR.

Parents may withdraw consent at any time.

Images are stored securely and deleted after use.

Only authorised staff may access image files.

9. Breaches & Reporting

Any breach of this policy is treated seriously and may result in:

Disciplinary action

Safeguarding referral

LADO involvement

Police investigation (if criminal activity is suspected)

This policy is reviewed annually or whenever statutory guidance changes.

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 01 September 2026

Signed:

Name: 

Katie Lewty

Position: Operations Director, Munchkin Sports Ltd