POLICY ADVISORY

Policy Title: Photo Documentation and Storage

Policy Number: FO-25-01

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OVERVIEW

At times, EEC staff may find that taking a photograph while conducting EEC business, including during a program visit, would allow them to better provide technical assistance or document an observation more accurately than observation notes alone. This policy advisory explains the guidelines established for EEC staff, should they choose to use photographs to document regulatory findings and observations during monitoring, licensing, and investigation activities.

KEY UPDATES

- The use of photography may be helpful to EEC staff in situations including, but not limited to:
    - Consulting with a supervisor to provide the program with technical assistance
    - Consulting with a supervisor before making a determination about a non-compliance
    - Documenting good practice at a program
    - Documenting evidence of a non-compliance
    - Documenting repeated non-compliances
    - Documenting evidence to support the determination of an investigation.
- To the best extent possible, EEC staff will be sensitive and respectful so that the use of photography does not disrupt program operations or children's activities.
- The photography of children by EEC staff is prohibited at all times.

- EEC staff may only take photographs using EEC-issued devices such as a cell phone, camera, or iPad. Personal devices may not be used to conduct EEC business.

- While it is not required that EEC staff obtain permission from program staff to take a photograph as part of conducting EEC business within the program's licensed or approved space, it is best practice to do so. EEC staff must, however, obtain verbal consent from the licensee before taking photographs of space that is not currently licensed or approved for use by EEC.

- Photographs may only be stored securely on the staff member's password-protected device.

- Photographs taken by EEC staff are part of the program's record and are subject to release when appropriately requested through EEC's Legal Unit, pursuant to applicable laws and regulations.

RESOURCES

For additional information regarding licensing visits, please see: EEC Inspection and Visit Policy.