



# Mobile Phones

## Policy, Guidance and Procedures

### 1. Introduction and aims

At Career Seekers Direct (CSD), we recognise that mobile phones, including smart phones, are an important part of everyday life for our customers and representatives.

Our policy aims to:

- Promote, and set an example for, safe and responsible phone use
- Set clear guidelines for the use of mobile phones for all.
- Support the company's other policies, especially those related to safeguarding and behaviour.

Where relevant, this policy also aims to address some of the challenges posed by mobile phones, such as:

- Risks to child, young people and adult protection
- Data protection issues
- Potential for session disruption
- Risk of theft, loss, or damage
- Appropriate use of technology in the CSD sessions

The policy is relevant to our Customers and Clients, Career Seekers Representatives (Employees and Contractors), Visitors and Volunteers. **Appendix A** details the reasons why the Policy is required.

### 2. Roles and responsibilities

#### 2.1 CSD Representatives

➤ All CSD Representatives (including employees, contractors and volunteers) are responsible for enforcing this policy.

- All CSD representatives are being protected by the procedures in this policy.
- Customers must secure their phones as much as possible, including using passwords or pin codes to protect access to the phone's functions.
- CSD Reps must also secure their personal phones, as well as any work phone provided to them. Failure by CSD Reps to do so could result in data breaches.
- Volunteers, or anyone else otherwise engaged by CSD will be made aware of this policy through the Induction/ when met by a CSD Rep.
- All CSD Reps need to use the *Record of Concern About an Adult or Child/Young Person* form should this policy be breached. These forms must be given/ emailed to CSD MD and the CSD DSL
- The CSD MD is responsible for monitoring the policy every two years, reviewing it, and holding CSD Reps and pupils accountable for its implementation.

### 3. Use of mobile phones by CSD Reps

#### 3.1 Personal mobile phones



All CSD Reps, (including volunteers, contractors and anyone else otherwise engaged by CSD) are not permitted to use their mobile devices while in the training sessions unless they are accessing something relevant to the session.

Use of personal mobile phones is restricted to non-contact time, and to areas where customers are not present such as an office.

Unless there are circumstances where immediate contact is needed, then CSD Reps should let family/ their child's school know that personal phones will be switched off during sessions.

The CSD MD will decide on a case-by-case basis whether to allow for special arrangements.

### 3.2 Data protection

*See CSD's policies on Data Protection*

- CSD Reps must not use their personal mobile phones to process personal data, or any other confidential CSD information.
- CSD can use their iPads/ cameras to take pictures – if granted permission.
- CSD Reps must secure their phones as much as possible, including using passwords or pin codes to protect access to the phone's functions. CSD Reps must also secure any work phone provided to them. Failure by Reps to do so could result in data breaches.

### 3.3 Safeguarding

*See CSD's policies on Safeguarding Children and Young People and Safeguarding Adults*

- CSD Reps must not give their personal contact details to any customer, including connecting through social media and messaging apps.
- CSD Reps must ensure their phone is switched off (not silent/ vibrate only).
- CSD Reps must not contact customers on the personal devices, only ever contacting them through their parent/carer/named contact should this be required/necessary to do so
- CSD Reps must avoid publicising their contact details on any social media platform or website, to avoid unwanted contact by customers.
- CSD Reps must not use their mobile phones to take photographs or recordings of customers, their work, or anything else which could identify them.
- If it's necessary to take photos or recordings as part of a session, this must be done using CSD's equipment.

### 3.4 Using personal mobiles for work purposes

In the event of an emergency evacuation, CSD Reps can use their mobile phones in an appropriate and professional manner, in line with the CSD Code of Conduct

CSD Reps must:

- not use their phones to take photographs or recordings of customers, their work, or anything else which could identify a customer
- Refrain from using their phones to contact parents. If necessary, contact must be made via the CSD phone



### 3.5 Work phones

Some members of CSD are provided with a mobile phone by CSD for work purposes.

Only authorised CSD Reps are permitted to use CSD phones, and access to the phone must not be provided to anyone without authorisation.

CSD Reps must:

- Only use phone functions for work purposes, including making/receiving calls, sending/receiving emails or other communications, or using the internet
- Ensure that communication or conduct linked to the device is appropriate and professional at all times, in line with our CSD code of conduct.

### 3.6 Sanctions

*See CSD's Disciplinary Procedures*

CSD Reps that fail to adhere to this policy may face disciplinary action.

## 4. Use of mobile phones by customers

Customers are allowed to bring a mobile to the session, though when a student, they must hand it in upon arrival. This includes:

- Students travelling to the session by themselves
- Customers travelling by car by their parents/carers (preferably left with their parent when reaching school)
- Students travelling to a session via HCC Transport
- Young carers who need to be contactable
- Personal phones/ tablets that are internet enabled and have cameras are not allowed at sessions (specific personal circumstances will be considered on a risk-assessed basis).

### 4.1 Sanctions

- CSD Reps are permitted to confiscate phones from customers (if a student this is under sections 91 and 94 of the Education and Inspections Act 2006)
- CSD Reps have the power to search customers' phones. In the case of the customer being a student, as set out in the DfE's guidance on searching, screening and confiscation. The DfE guidance allows CSD to search a pupil's phone if we have reason to believe the phone contains pornographic images, or if it is being/has been used to commit an offence or cause personal injury.
- If they are confiscated, parents/carers will be contacted to collect the phone/device
- Certain types of conduct, bullying or harassment can be classified as criminal conduct. CSD takes such conduct extremely seriously, and will involve the police or other agencies as appropriate. Such conduct includes, but is not limited to:
  - Sexting
  - Upskirting
  - Threats of violence or assault



- Abusive calls, emails, social media posts or texts directed at someone on the basis of someone's ethnicity, religious beliefs or sexual orientation

## 5. Use of mobile phones by volunteers and visitors

Visitors and volunteers (including governors and contractors) must adhere to this policy as it relates to CSD Reps if they are on the school site during the school day.

This means:

- Not taking pictures or recordings of customers during sessions
- Not posting any images/data about the customers/sessions on social media without consent
- Visitors and volunteers will be informed of the rules for mobile phone use when they sign in at reception
- Volunteers or visitors attending the sessions must not take photos or recordings of customers, their work, or anything else which could identify them

Appendix provides a Mobile Phone Information Slip for Visitors and Volunteers to read and sign at CSD sessions

## 6. Loss, theft or damage

Customers bringing phones to our sessions must ensure that phones are appropriately labelled

Customers must secure their phones as much as possible, including using passwords or pin codes to protect access to the phone's functions. CSD Reps must also secure their personal phones, as well as any work phone provided to them. Failure by CSD reps to do so could result in data breaches.

CSD accepts no responsibility for mobile phones that are lost, damaged or stolen during one of their sessions. This includes while travelling to and from the session.

Confiscated phones will be stored in a secure location until collected.

Lost phones should be returned to CSD Head Office. CSD will then attempt to contact the owner.

## 7. Monitoring and review

CSD is committed to ensuring that this policy has a positive impact on our customers' education, behaviour and welfare. When reviewing the policy, CSD will take into account:

- Feedback from parents and pupils and all our customers
- Feedback from CSD Reps
- Records of behaviour and safeguarding incidents
- Relevant advice from the Department for Education, the local authority or other relevant organisations

### Version Control

Version: 2.0

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Review Period: Every two years

Policy Written By: Eva Harrison

Policy Reviewed By : Neil Adams

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## Appendix A

### Incidents that have happened in UK schools and why we CSD need to ensure all our customers and adults are safe.

- Use of mobile devices for up-skirting and obtaining imagery of genitals
- Adults taking pictures of children for theirs and others' sexual gratification
- Pornography and violent content accessed by children's own internet connectivity whilst in school
- Gang culture, knives, extremism, Drill and Grime music accessed by children's own internet connectivity
- Inappropriate and violent games accessed and played including 'Blue Whale' which requests users to undertake a series of tasks; the final one being suicide
- Pornographic and violent interpretations of known children's cartoons etc. accessed inadvertently
- Inappropriate and 'dangerous' material stored on personal devices by family members, then accessed without internet connectivity in school
- Pupils contacting family members/ birth family against parental permission
- Pupils taking pictures and videos of staff, creating memes and using VI to distort images, meaning and publishing online, leading to suspension and disciplinary action
- Using images taken of other pupils for bullying and humiliation on social media
- Sharing of personal data on social media inappropriately



## Appendix B: Mobile phone information slip for visitors and volunteers

### Visitors: Use of mobile phones in our company

- Please keep your mobile phone on silent/vibrate while delivering our services
- Please do not use phones where customers are present. If you must use your phone, you may go to an area away from the customers. Do not take photos or recordings of customers (including your own children), or other CSD Reps.
- Do not use your phone when working with customers
- CSD accepts no responsibility for phones that are lost, damaged or stolen while you are delivering CSD's services.
- A full copy of our mobile phone policy is available on the website.

Signature:

Date:

