Personal Device Policy

Date:	28th October 2026
Review date:	28th October 2027
Approved by:	Rob Grays - Chief Executive Officer

Contents

Purpose & Scope 3

Definitions 3

Roles and Responsibilities 4

Temporary Worker Responsibilities *4*

Client Responsibilities *5*

Service User Responsibilities *6*

Parents/Carers/Guardian Responsibilities *6*

Use of Artificial Intelligence (AI) 6

Safeguarding Procedures 7

Consequences 7

Data Protection 7

Enforcement 7

Review 7

Purpose & Scope

This Personal Device Policy applies to all Prospero Group Temporary Workers, Clients, Service Users, and Parents, Carers or Guardians who may be involved in, affected by, or interact with the use of personal communication and/or electronic devices during the provision of services arranged by Prospero Group.

The purpose of this policy is to ensure that the use of personal devices does not compromise the safeguarding, welfare, privacy, security, confidentiality or integrity of information belonging to Prospero Group, its Clients or Service Users. Personal devices can present significant risks, including breaches of professional boundaries, unauthorised communication, inappropriate recording or sharing of information, unauthorised access, disclosure, loss, theft or misuse of sensitive information. This policy aims to ensure that these risks are identified, managed and minimised through the safe and appropriate use of personal devices.

Temporary Workers are only permitted to use personal communication devices while on a Client site where such use has been authorised and is necessary for the performance of their duties. Personal electronic devices must not be taken onto or used on a Client site unless prior written approval has been obtained from both the Client and Prospero Group. An exception applies to Temporary Workers delivering CES tuition sessions, where personal electronic devices may be used in accordance with CES operational procedures and Client requirements.

Where possible, Temporary Workers are encouraged to use equipment provided by the Client, Service User, or publicly available facilities, such as libraries, community centres, educational establishments, or other approved venues, rather than using their own personal devices. Where a Prospero CES Service User has a suitable device available for the delivery of services, this should be used in preference to a Temporary Worker's personal device. To maintain appropriate professional boundaries and reduce safeguarding risks, Temporary Workers should avoid physically handling or operating a Service User's device wherever possible and should instead guide the Service User in its use. Any use of Client, Service User or public devices must be undertaken in accordance with applicable data protection, confidentiality and information security requirements.

Definitions

- **Adult at Risk** – any person aged 18 years and over, who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.
- **Child** - any person under the age of 18.
- **Client** – an organisation, which engages with Prospero Group to purchase Work-Finding Services. This includes, amongst others: Schools, Local Authorities, Care Homes, Universities, Parents/Carers and Private Sector organisations.
- **Personal communication device** – is defined to mean smart phone that is used on shift for work-related text and call-based communication, timesheet submissions and report writing.
- **Personal electronic device** – is defined to mean laptop, tablet or other electronic device that is not a personal communication device.
- **Prospero Group** – is comprised of three entities: Prospero Teaching, Prospero Health & Social and Prospero Integrated.
- **Service User** – is defined to mean Child, Children or Adult at Risk.
- **Temporary Worker** – an individual receiving Work-Finding Services, delivered by Prospero Group. This includes, amongst others: Teachers, Tutors, Teaching Assistants, Care Assistants, Support Workers and Nurses.
- **Work-Finding Services** – taken to mean recruitment activity, advertising of roles and provision of work-related training, provided by Prospero Group.

Roles and Responsibilities

Temporary Worker Responsibilities

When on assignment, Temporary Workers must follow the Client's personal device policy. Where no such policy exists, this policy shall apply.

Temporary Workers are only permitted to use personal communication devices while on a Client site where such use has been authorised and is necessary for the performance of their duties. Personal electronic devices must not be taken onto or used on a Client site unless prior written approval has been obtained from both the Client and Prospero Group. An exception applies to Temporary Workers delivering CES tuition sessions, where personal electronic devices may be used in accordance with CES operational procedures and Client requirements.

If using a personal electronic device during the delivery of services, Temporary Workers must ensure that any content displayed, accessed, shared with, or viewed by a Service User is appropriate to the Service User's age, needs, and circumstances, and does not contain any material that could be considered unsuitable, offensive, discriminatory, or harmful.

Any Temporary Workers who are required or authorised to use their own personal communication device and/or personal electronic device as part of their role and placement through Prospero Group are required to:

- Where provided, use a Prospero-issued or Client-issued communication device in preference to a personal communication device.
- Use personal devices only where necessary for the performance of their duties and where such use is permitted by the Client and Prospero Group.
- Maintain appropriate professional boundaries at all times when using a personal device in connection with their work.
- Never take, store, share or transmit photographs, videos, audio recordings, screenshots or screen recordings of a Service User, Client information or Client premises unless explicitly authorised in writing by both the Client and Prospero Group.
- Never share personal contact details with a Service User unless explicitly authorised in writing by both the Client and Prospero Group.
- Never communicate with a Service User through personal social media accounts, messaging applications or other electronic communication platforms unless explicitly authorised in writing by both the Client and Prospero Group.
- Ensure that all communications relating to a Service User remain professional, factual, appropriate and relevant to the delivery of services.
- Be aware that any communication or interaction, however well intentioned, may be misinterpreted by a Service User, observer or third party and should therefore be undertaken with appropriate care and professionalism.
- Be mindful when using a personal communication device in the presence of a Service User, particularly where a Deprivation of Liberty Safeguards (DoLS) order is in place or where such use may cause distress, confusion or misunderstanding.
- Keep the use of personal communication devices to a minimum when accessing, viewing or processing Client, Service User and/or Prospero Group information in public places.
- Where using a personal communication device to complete reports, records or notes, do so in a location away from the Service User wherever reasonably practicable.
- Ensure that any authorised personal device used for work-related purposes is protected by a PIN, password, passphrase or biometric authentication, has automatic screen-lock enabled and is maintained with current operating system and security updates where available.
- Keep personal communication devices locked whenever they are not actively being used and, where possible, store them securely and out of sight in a locked drawer, cupboard, locker or other secure location.
- Never use a personal communication device in the presence of a Service User to make personal calls, access personal social media accounts or engage in other non-work-related activities.
- Access and retain only the minimum amount of Client, Service User and/or Prospero Group information necessary to carry out their duties.

- Not store, synchronise, back up or transfer Client, Service User or Prospero Group information using personal email accounts, personal cloud storage services or any unauthorised applications or platforms.
- Retain Client, Service User and/or Prospero Group information on a personal device only for as long as is necessary to carry out their duties and ensure that such information is securely deleted when no longer required and, wherever possible, no later than seven days following the end of the assignment.
- Take all reasonable steps to prevent any personal communication device or authorised personal electronic device from being lost, stolen, damaged or accessed by unauthorised persons.
- Immediately report, and in any event within 24 hours of becoming aware of the incident, any damage, loss, theft, unauthorised access, suspected compromise, accidental disclosure or other data security incident involving a personal device that contains or may contain Client, Service User and/or Prospero Group information.
- Cooperate with any reasonable safeguarding, disciplinary, Client complaint or data protection investigation relating to work-related information held on, accessed through or transmitted by a personal device.
- Inform their Prospero Group Consultant if they do not understand any aspect of this policy or require additional guidance, support or training.

Where a Temporary Worker chooses or is required to use a personal electronic device in connection with their work, they do so at their own risk. Prospero Group accepts no responsibility or liability for the loss, theft, damage, malfunction, repair or replacement of any personal device used for work-related purposes. Temporary Workers are encouraged to ensure that their personal devices are adequately protected and insured, where appropriate, to cover accidental damage, loss or theft whilst travelling to, from, or during the course of an assignment.

Client Responsibilities

Clients play an important role in ensuring the safe, appropriate and secure use of personal devices by Temporary Workers. In support of this, Clients are required to:

- Inform Prospero Group of any restrictions, requirements or prohibitions relating to the use of personal devices before the Temporary Worker commences the assignment.
- Provide Temporary Workers with a copy of, or access to, any relevant policies, procedures or guidance relating to the use of personal devices, where applicable.
- Clearly communicate any Service User-specific, site-specific or role-specific requirements that may affect the use of personal devices.
- Where personal devices are not permitted, make Temporary Workers aware of any alternative arrangements for communication, reporting or access to work-related systems.
- Notify Prospero Group immediately of any concerns regarding a Temporary Worker's use of a personal device, including any safeguarding, conduct, confidentiality or information security concerns.
- Inform Prospero Group as soon as reasonably practicable of any actual or suspected loss, unauthorised disclosure or misuse of Client or Service User information involving a Temporary Worker.
- Ensure that any authorisation provided for the use of personal electronic devices is proportionate, necessary for the assignment and communicated clearly to both the Temporary Worker and Prospero Group.
- Where personal devices are authorised for use, ensure that their use is consistent with the Client's safeguarding, confidentiality, information security and data protection requirements.
- Provide suitable equipment, where available and appropriate, to reduce the need for Temporary Workers to use personal devices during the delivery of services.
- Cooperate with Prospero Group in the investigation of any safeguarding, conduct, data protection or information security concerns involving the use of personal devices.
- Inform Prospero Group of any requirement for a Temporary Worker to use a personal communication device or personal electronic device as part of the assignment before the placement commences.

Service User Responsibilities

Where a Service User is using a personal device or a device provided by a parent/carer/guardian, Client, educational setting or other organisation during the delivery of services, they should, where appropriate to their age, understanding and capacity:

- Use devices safely, responsibly and in accordance with any rules set by their educational setting, care provider, parent/carer/guardian or Client.
- Treat Temporary Workers, staff and other individuals respectfully in all communications and online interactions.
- Not take, share, record, livestream, photograph, video or audio record a Temporary Worker, other Service Users or members of staff without permission and appropriate authorisation.
- Not share personal information about themselves, other Service Users or Temporary Workers unless this is necessary for the delivery of services and has been agreed where appropriate.
- Not seek to contact Temporary Workers through personal telephone numbers, personal email accounts, social media platforms, gaming platforms, messaging applications or other personal communication channels.
- Report any online communication, content, behaviour or interaction that makes them feel uncomfortable, unsafe, worried or at risk to a trusted adult, parent/carer, Client representative or Temporary Worker.
- Follow reasonable instructions relating to the safe use of technology during the delivery of services.
- Not use devices to access, display, create, store or share content that is illegal, inappropriate, discriminatory, abusive, harmful, threatening or offensive.
- Respect the privacy, confidentiality and personal boundaries of others at all times.
- Understand that online safety concerns, safeguarding concerns, inappropriate communications or misuse of technology may need to be shared with parents/carers/guardians, the Client, safeguarding professionals or relevant authorities where necessary to protect the welfare of individuals.

Parents/Carers/Guardian Responsibilities

Where applicable, parents/carers/guardians are encouraged to:

- Support safe and appropriate use of technology during the delivery of services.
- Monitor and supervise their child's use of personal devices where appropriate.
- Report safeguarding, online safety or professional boundary concerns promptly.
- Support the maintenance of appropriate professional boundaries between Service Users and Temporary Workers.
- Ensure that any device provided for sessions is suitable, secure and used in a manner that promotes the safety and welfare of the Service User.

Use of Artificial Intelligence (AI)

Temporary Workers must not upload, input, share, or process any personal data, safeguarding information, placement information, client information, candidate information, or any confidential or proprietary Prospero Group information using artificial intelligence (AI) tools or platforms unless expressly authorised in writing by Prospero Group.

Clients, Parents, Carers and Service Users are expected to treat all information received from Prospero Group as confidential and must not upload, input or share Prospero Group documents, communications, candidate information, placement information, or other confidential business information within AI platforms without prior written consent from Prospero Group.

Safeguarding Procedures

Prospero Group will follow established safeguarding procedures in accordance with local and national guidance. This may involve contacting the police, social services, or other relevant authorities depending on the circumstances.

Consequences

Failure to adhere to this policy may result in termination of the Temporary Worker's Work-Finding Services and referral to the Disclosure and Barring Service / relevant professional body, if applicable.

Data Protection

Prospero Group will treat all Temporary Workers' data confidentially and in accordance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulations 2018.

Enforcement

This policy will be enforced by Prospero Group's CEO, Managing Director, Operations Directors, Head of Compliance & Safeguarding, Head of HR and Data Protection Officer.

Failure to adhere to this policy may result in suspension / termination of the Temporary Worker's Work-Finding Services and referral to the Disclosure and Barring Service / relevant professional body, if applicable.

Review

This policy will be reviewed annually and may be updated in line with government guidance.