

## Personal Device Policy

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<b>Review date:</b>	28 <sup>th</sup> March 2025
<b>Approved by:</b>	Rob Grays – Chief Executive Officer

### Introduction

This Personal Device Policy is applicable to any **personal communication devices** and **personal electronic devices** used by Prospero Group Temporary Workers.

Modern smart devices are capable of accessing and storing data, and running business applications. While the use of personal communication devices can bring many benefits, and help Temporary Workers to better do their jobs, it also introduces a significant risk. That risk is that data, or access to that data, may fall into the wrong hands due to the loss or improper use of a personal device.

As an organisation Prospero Group have taken a decision to allow Temporary Workers to use their personal communication device for work purposes. This policy has been developed to ensure that the Client's, Service User's and Prospero Group's data is not put at risk from the use of smart devices in this manner.

Where a Temporary Worker requires access to a personal communication device to undertake their duties, this policy provides the necessary guidance so that it is done in a manner that doesn't introduce threats to the safety and integrity of this data.

### Scope

This policy applies to Prospero Group Temporary Workers.

This policy is to ensure that work related access risks, associated with personal communication devices, are recognised, assessed and managed.

### 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

When on assignment all Temporary Workers should follow the Client's policy for personal devices, unless one does not exist, whereupon they should follow this policy.

Temporary Workers are only permitted to use personal communication devices whilst at/on site. Personal electronic devices must never be taken to/used on site, unless explicitly agreed in writing by both the Client and Prospero.

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

- Where provided, use the package communication device – in replacement of personal communication device.
- Never take or store photos of a Service User unless explicitly agreed in writing by both the Client and Prospero.
- Never share their contact details with the Service User unless explicitly agreed in writing by both the Client and Prospero.
- Keep any communications about the Service User professional and factual.
- Be aware that even well-intentioned, any communication may be misconstrued by the Service User, an observer or by anyone to whom this action is described.
- Be mindful when using a personal communication device in front of a Service User – especially where a Deprivation of Liberty Safeguards (DoLS) order is in place.
- Keep the use of any personal communication device to a minimum when accessing Client, Service User and / or Prospero Group data in public areas.
- Where using a personal communication device for completion of reports, attempt to complete the notes in a location away from the Service User.
- Keep any personal communication device screens locked when not actively being used.
- Never use a personal communication device in front of a Service User to make personal calls and/or access Social Media (including but not limited to, Facebook, Instagram, Snapchat and X – formally Twitter).
- Only hold data on any personal communication device for as long as is required – the data should be deleted promptly at the end of placement to reduce the risk of the data being accessed by unauthorised persons.
- Not deliberately put their any personal communication device at undue risk of being stolen, lost or accessed by unauthorised persons.
- Report any loss, theft or data security incidents associated with their any personal communication device where information about the Client, Service User and / or Prospero Group could be accessed by unauthorised persons.
- Must inform their Prospero Group Consultant if they do not understand any aspects of this policy and/or require further associated training.

Prospero cannot be held liable for any damages to personal devices.

## 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.