Fioretti Trust

Aspiration Wisdom Compassion

Personal Devices and Mobile Technology Policy

This policy supersedes all other Mobile phone policies

Approved by:	Trustees
Date of review:	July 2026
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Cycle:	Biennial

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Executive Statement

The Fioretti Trust is committed to providing safe, focused and high-quality learning environments across all our Church of England schools. This policy provides a trust-wide framework for the use of personal mobile devices and connected technology, which are prohibited in most circumstances on school premises and during school-managed activities. It is grounded in the January 2026 DfE guidance, operative from April 2026, which sets out that all schools should be mobile-phone-free environments by default. Anything other than this is by exception only. Ofsted will assess mobile phone policy and its implementation at every inspection under the renewed 2025 framework. This policy has been developed through active collaboration with headteachers across the trust, reflects the distinct contexts of our school communities, and will be reviewed annually, or sooner if there are changes in legislation.

1. Policy Title, Scope and Application

This policy is formally titled the Personal Devices and Mobile Technology Policy. The Trust has deliberately adopted this broader title to reflect the extended scope of the January 2026 DfE guidance, which requires schools to address not only smartphones but all devices with similar functionality, including smartwatches and other wearable connected technology.

This policy applies to:

- All pupils on roll at any of the Fioretti Trust schools, regardless of year group or phase
- All employed staff, including teachers, teaching assistants, support, site, kitchen and administrative staff
- Supply staff, peripatetic teachers and agency workers
- Governors, trustees and external visitors to any trust site
- Parent and carer volunteers accompanying school trips or on-site activities

The policy applies:

- On all school premises and within all buildings on school sites
- During the school day, defined as from the time of first pupil arrival to the time the last pupil leaves the site
- During all off-site activities managed by the school, including school trips, sports fixtures, residentials and community events
- In any online or digital context where a personal device is used in connection with school business, pupils or colleagues

2. Legislative and Guidance Framework

This policy has been developed with reference to the following statutory and non-statutory documents. All cross-references have been verified against documents current as of March 2026.

Document / Legislation	Date / Status	Relevance to This Policy
DfE: Mobile Phones in Schools Guidance	January 2026	Primary operative

Document / Legislation	Date / Status	Relevance to This Policy
for Schools in England	(operative April 2026)	document; establishes mobile-free default and extended device scope
Education Act 2011 s.91	Statute	Authorises head teachers to search for and seize prohibited items, including mobile phones
Children's Wellbeing and Schools Bill	April 2029	Schools are required to enforce national guidance to limit mobile phone use, largely creating phone-free environments.
UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018	In force	Governs capture, storage and processing of images and personal data involving pupils and staff
Keeping Children Safe in Education (KCSiE) 2026	September 2026	Safeguarding obligations including online safety and prevention of image-based abuse
Equality Act 2010	In force	Requires reasonable adjustments for pupils and staff with disabilities; medical device exemptions must be applied consistently
Health and Safety at Work etc. Act 1974	In force	Employer duty to manage risk; medical device use requires risk assessment
EYFS Statutory Framework 2024	September 2024	Prohibits use of personal mobile devices in areas where children under 5 are present
Ofsted School Inspection Handbook 2025 (renewed framework)	September 2025	Inspectors will assess mobile phone policy and implementation at every inspection
School Inspection Toolkit v1.1	2025	Provides evaluative criteria against which implementation will be judged

Document / Legislation	Date / Status	Relevance to This Policy
DfE Online Safety in Schools and Colleges	2023 (non-statutory)	Guidance on digital safeguarding including social media and image sharing
DfE Behaviour in Schools guidance	2024	Mobile phone restriction as a behaviour management tool; supports zero-tolerance approaches

3. Devices Covered by This Policy

The January 2026 DfE guidance explicitly extends the mobile-phone-free principle to all devices with similar functionality to a smartphone, including smartwatches. The Trust has adopted a comprehensive device scope to ensure consistent and unambiguous implementation across all academies. The table below sets out the position on each category of device.

Device / Technology	Examples	Scope of This Policy
Smartphones	All makes and models	Yes — full prohibition during the school day unless exempted
Basic mobile phones (calls/texts only)	Non-smart handsets	Yes — subject to same storage and use rules
Smartwatches and smart bands	Apple Watch, Samsung Galaxy Watch, Fitbit with notifications	Yes — must not be used to make/receive calls, messages or notifications during school day
Fitness trackers (data only, no connectivity)	Basic step counters without Bluetooth/Wi-Fi	School discretion — subject to headteacher approval
Tracking devices	Apple AirTags, Tile, GPS trackers	Permitted for parent reassurance if stored securely in bag; must not be used by pupil to monitor others
Wearable cameras	Body cams, clip-on cameras, camera-equipped glasses	Prohibited on school site at all times
Personal tablets and e-readers	iPad (personal), Kindle	Prohibited unless specified in EHCP or medical plan
Wireless earbuds and	AirPods, Beats, earphones	Not permitted during the

Device / Technology	Examples	Scope of This Policy
headphones		school day without medical or SEND rationale
School-issued devices	Trust iPads, laptops, Chromebooks	Governed by Acceptable Use Policy — not subject to this policy
Medical monitoring devices	Continuous glucose monitors, insulin pumps, cardiac monitors	Permitted — risk assessment required; see Section 7

Where a device category is not listed above and a question arises regarding its status, the default position is that it falls within the scope of this policy unless the headteacher determines otherwise in writing. Any such determination must be notified to the COO.

4. Pupils — Expectations and Procedures

4.1 Default Position

The Fioretti Trust operates a mobile-phone-free default across all schools. Pupils must not use, display or have visible access to a personal mobile phone or any device falling within the scope of this policy during the school day. The Trust includes schools that are already operating as 'Smartphone-Free Schools' and is keen to extend this approach across the Trust during a transition period.

Schools are not required to and will not conduct bag searches as a routine enforcement mechanism. The expectation is that pupils and families understand and voluntarily comply with the policy, supported by clear communication and a positive school culture.

4.2 Phased Approach to Smartphone-Free Culture

The Trust supports headteachers who wish to develop a long-term smartphone-free school culture. Headteachers are encouraged to use this policy as a foundation for wider community engagement. A phased approach — for example, beginning with Year 5 and 6 pupils before extending to all year groups — may be appropriate in some school contexts. Any such approach should be discussed with the Local Governing Body, communicated clearly to families and reported to the Governance and Compliance Professional.

SCHOOL CUSTOMISATION: Phased smartphone-free ambition
St. Laurence Church Junior School has ambitions to be a Smartphone Free School and is working hard to develop that culture through engagement with parents and children. The school is working in conjunction with Smartphone Free Childhood and regularly holds events and meeting for parents to attend. More information can be found at Smartphone Free Childhood

4.3 Breach of Policy: Pupils

If a pupil is found using or displaying a personal device in breach of this policy, the following procedure applies:

- First instance: the device is confiscated by the member of staff, stored securely by the

school office and returned to the pupil at the end of the school day. Parents/carers are informed.
- Repeated breach: the device is confiscated and may only be collected by a parent or carer. The headteacher is informed.
- Serious breach (e.g. recording of staff or pupils, accessing inappropriate content, sharing harmful images): treated as a safeguarding and/or disciplinary matter in accordance with the school's Behaviour Policy and KCSiE 2026.

Confiscation is authorised under section 91 of the Education Act 2011. Staff will not access the content of a confiscated device unless there is a safeguarding reason to do so, in which case the school's Designated Safeguarding Lead (DSL) must be involved.

5. Staff: Expectations and Procedures

5.1 Guiding Principle

Staff are professional role models. The Trust's expectation is that staff conduct in relation to personal devices reflects the same standard we ask of pupils. Staff must use personal devices with discretion and professionalism at all times. This section sets out the specific expectations that apply in different contexts.

5.2 Areas Where Children Are Present

Staff must not use personal mobile phones in any area of the school site where children are present, except in the circumstances listed below. This requirement is absolute in Early Years Foundation Stage (EYFS) settings, where the EYFS Statutory Framework 2024 prohibits the use of personal mobile devices in areas where children under five are present. There is no discretion available in EYFS; this is a statutory requirement.

Permitted exceptions for all staff:

- Emergency situations where the school telephone system is unavailable or insufficient
- Use for two-factor authentication (2FA) to access school systems, provided this is completed promptly and the device is not used for any other purpose
- Medical monitoring as specified in an approved risk assessment (see Section 7)
- A pre-notified medical call, subject to the procedure in Section 5.3 below

5.3 Staff Awaiting Medical Calls

If a member of staff is expecting an urgent medical call, for example, from a GP, hospital or specialist - they must inform the headteacher (or in their absence, the deputy headteacher or SLT member on duty) at the start of that school day. Wherever possible, the call should be redirected to the school office telephone line. Where this is not possible and the staff member must receive the call on a personal device, this must be agreed with the headteacher in advance and the call must be taken away from areas where pupils are present.

5.4 Photography and Recording in School

The Trust's preferred position is that all photography and video recording of pupils on school premises uses school-issued devices (such as trust iPads). This ensures that images remain within school systems, are subject to appropriate data governance and are not stored on

personal devices connected to third-party cloud services.

Where a school-issued device is not available and it is operationally necessary to capture an image, for example, to document learning for a school platform - a staff member may use their personal device only where:

- SLT awareness has been confirmed before the photograph is taken
- Valid parental consent is in place for the pupils photographed
- The image is transferred to the school system immediately following the session
- The image is deleted from the personal device as soon as transfer is confirmed

Staff must never use personal devices to take photographs for personal use on school premises or during school-managed activities. Recording of colleagues without consent is a disciplinary matter.

5.5 Social Media

Staff must not post images of pupils on personal social media accounts. Responsibility for publishing content to the school's official social media channels rests with the headteacher or a specifically designated member of staff. Schools must maintain a record of who holds this responsibility. Before any image is published on any school social media platform, valid and current parental consent must have been obtained.

The Trust's Social Media Policy sets out detailed guidance on acceptable use and professional boundaries online. Staff are required to have read and complied with that policy.

5.6 School Trips and Off-Site Activities

During school trips and off-site activities, the expectation that staff use personal devices only with discretion continues to apply. Staff leading or supervising a group may use a personal device for communication with the school base in the absence of a school-issued device. The use of personal devices in ways that are not related to the management of the trip - including personal calls, browsing and social media - must not take place while staff are responsible for a group of pupils.

5.7 Breach of Policy: Staff

Failure to comply with this policy may constitute a disciplinary matter and will be managed in accordance with the Trust's Disciplinary Policy. Serious breaches - including inappropriate photography, use in EYFS settings or sharing of images of pupils - will be treated as safeguarding concerns under KCSiE 2026 and may be referred to the Local Authority Designated Officer (LADO).

6. Governors, Volunteers and Visitors

All governors, volunteers and visitors to any Fioretti Trust schools are subject to the same expectations regarding personal device use while on school premises. The school's visitor policy must communicate the key requirements of this policy at the point of signing in. Visitors who fail to comply will be asked to secure their device or, where appropriate, to leave the premises.

Governors carrying out monitoring visits must not photograph, record or access content on personal devices while pupils are present, unless formally authorised and conducted in accordance with the school's safeguarding protocols.

7. Medical Monitoring Devices: Pupils and Staff

The Equality Act 2010 requires the Trust to make reasonable adjustments for individuals with disabilities or medical conditions. This section describes how the Trust manages the use of connected technology required for medical monitoring, ensuring both legal compliance and the integrity of the mobile-device-free environment.

7.1 Examples of Qualifying Medical Devices

Medical monitoring devices that may require a policy exemption include, but are not limited to:

- Continuous glucose monitors (CGMs) and associated smartphone apps used by pupils or staff with Type 1 or Type 2 diabetes
- Insulin pump systems with Bluetooth connectivity (e.g. closed-loop systems)
- Cardiac monitors or implantable cardiac device monitoring systems
- Seizure alert devices
- Any other device prescribed or recommended by a medical professional for continuous health monitoring

The biological basis for these exemptions is unambiguous: continuous glucose monitors, for example, use interstitial fluid glucose measurement via a subcutaneous sensor, transmitting data to a receiver or smartphone every one to five minutes. Interruption to the monitoring function - or to the ability to read and act on the data - carries a genuine clinical risk. The Trust takes this seriously and does not regard these devices as comparable to general smartphone use.

7.2 Risk Assessment Procedure

Any pupil or member of staff who requires use of a medical monitoring device during the school day must have a completed and approved risk assessment in place before the device is used on school premises. The risk assessment must be completed by the headteacher in consultation with:

- The pupil's parent/carer and, where appropriate, the pupil themselves (in line with age and understanding)
- The member of staff, if the device relates to a staff health condition
- The school's SENCO or first aider, as appropriate
- The individual's healthcare team, where written guidance has been provided (e.g. an individual healthcare plan)

The risk assessment must document: the specific device and its function; the clinical rationale for continuous access; who is responsible for monitoring alerts; what actions are to be taken in the event of an alert; and how the device is stored and accessed during the school day.

Risk assessments must be reviewed annually and following any significant change to the

individual's medical management. For any further support, please contact the COO.

8. Data Protection and Image Governance

Any photograph or video recording of a pupil constitutes personal data under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. All such data must be processed lawfully, fairly and transparently, and stored only on systems with appropriate technical and organisational safeguards.

Photographs or videos taken on personal devices during school activities - even where these have been transferred to school systems - must be deleted from the personal device immediately following transfer. Retention on a personal device, or upload to personal cloud storage, constitutes a data protection breach and must be reported to the Trust's Data Protection Officer (DPO).

Parental consent for use of images in school communications, the website or social media must be current and must be re-sought following any material change in use. Schools must maintain a current consent register and must not use the image of any pupil whose consent has not been granted or has been withdrawn.

Any data protection concern arising from the use of personal devices must be reported in the first instance to the headteacher and then to the Trust's DPO.

9. Safeguarding

This policy operates in conjunction with the Trust's Safeguarding and Child Protection Policy and must be read alongside it. The use of personal mobile devices creates a range of safeguarding risks, including but not limited to:

- Cyberbullying and online harassment between pupils
- Exposure to age-inappropriate content
- Image-based abuse, including non-consensual sharing of photographs or videos
- Grooming through messaging applications
- Unauthorised surveillance of pupils or staff

All staff must report any safeguarding concern arising from mobile device use to the school's DSL without delay. The DSL will determine the appropriate response in line with KCSiE 2026.

Where a personal device has been confiscated and there is reason to believe it contains evidence relevant to a safeguarding investigation, the device must be secured and handed to the DSL. The content of the device must not be accessed by any member of staff other than the DSL, and only where it is safe and proportionate to do so. Police referral may be appropriate.

10. Communication and Parental Engagement

The Trust will communicate this policy clearly to all parents and carers at the start of each academic year and to new families on admission. Schools are encouraged to provide a plain

English summary of the key points for parents, and to use this policy as a foundation for wider conversations about children's relationship with technology and screen time.

Any proposed change to the trust-level position on pupil device use must be consulted on with parents before implementation and must be reported to the CEO.

11. Ofsted Inspection Readiness

Under the Ofsted renewed inspection framework (2025) and the School Inspection Toolkit v1.1, inspectors will assess both the existence of a mobile phone policy and the quality of its implementation at every school inspection. The Chief Inspector has publicly confirmed support for headteachers taking a firm approach to mobile phone restriction.

To demonstrate effective implementation, each academy should be able to evidence:

- A current, approved policy (this document, supplemented by school-specific inserts)
- Clear communication of the policy to staff, pupils and parents
- Consistent application of the policy by all staff
- A record of how breaches have been handled
- Completed risk assessments for any permitted medical device exemptions
- Evidence of governor oversight of the policy and its implementation
- Where applicable, evidence of parental engagement in developing the school's approach

Inspectors may speak with pupils, staff and parents about how the policy operates in practice. Schools should ensure that all staff can clearly articulate the key requirements without reference to documentation.

12. Review, Approval and Version Control

This policy is a trust-level document. It is subject to annual review or earlier review in the following circumstances:

- Royal Assent of the Children's Wellbeing and Schools Bill
- Material revision to the DfE mobile phones in schools guidance
- A significant safeguarding incident involving personal device use in a trust academy
- Material change to Ofsted inspection methodology relevant to this policy area

School-specific inserts (e.g 4.2) are the responsibility of the headteacher and must be reviewed at the same time as the trust-level policy. Headteachers must confirm to the Governance and Compliance Professional that school-specific inserts have been reviewed and updated before the beginning of each academic year.

End of policy

APPENDIX A

Medical Monitoring Device Risk Assessment

Purpose and Scope
This template must be completed for every pupil or member of staff who requires use of a connected medical monitoring device during the school day (see Policy Section 7.2). It documents the clinical rationale, operational arrangements and emergency response plan for the individual concerned. A separate form must be completed for each individual.

The completed form must be: signed by the headteacher; stored in the individual's school file; shared with all relevant staff (e.g. class teachers, first aider, DSL); reviewed annually or following any significant change to the individual's medical management.

Section 1 — Administrative Details

Individual Details	
School / Academy	
Individual's full name	
Role / Year group	
Date of birth	
This assessment relates to	☐ Pupil ☐ Member of staff
Assessment Details	
Date of this assessment	
Review due date	
Completed by (name & role)	
Approved by (headteacher)	

Section 2 — Medical Device Information

Device Details	
Name / type of device	
Manufacturer and model	
Connectivity type	☐ Bluetooth ☐ Wi-Fi ☐ Cellular ☐ Other: _____
Companion device(s) *e.g. dedicated receiver, smartphone app — state make/model*	
App / software name	
Clinical Details	
Medical condition	
Clinical rationale for continuous access	
Supporting clinical documentation attached?	☐ Individual Healthcare Plan ☐ Clinician's letter ☐ Hospital care plan ☐ Other: _____ ☐ None (reason below)
If no documentation, reason	
Prescribing / Recommending Clinician	
Name of clinician / team	
Contact number / email	

Section 3 — Operational Arrangements During the School Day

Device Use and Access	
Where will the device be worn / carried? *e.g. worn on upper arm, carried in named pouch, kept in bag at all times*	
Where will the companion device / receiver be kept? *e.g. in pupil's named pouch in classroom, on person of named staff member*	
Circumstances in which the individual may check the device *e.g. at any time in class; only when alert sounds; with permission of teacher*	
May the device be used to make or receive calls or messages?	☐ No (monitoring function only) ☐ Yes — specify limited circumstances:
Staff Awareness	
Staff who must be informed and trained	
Method and date of staff briefing	
Named first aider / school nurse responsible for monitoring support	
Trips, PE and Off-Site Activities	
Arrangements for PE / physical activity *e.g. device remains in place; receiver held by supervising staff member; any adaptations to PE participation*	
Arrangements for off-site activities and school trips	

Section 4 — Alert and Emergency Response Plan

Alert Thresholds (complete for CGM / glucose monitoring)	
Low glucose alert threshold (mmol/L) *Value set on device — provided by clinician or individual healthcare plan*	
Urgent low / critical low threshold (mmol/L) *Value at which emergency response is required*	
High glucose alert threshold (mmol/L) *Value set on device*	
Response to Alerts	
Action when low glucose alert activates *Step-by-step response — e.g. offer 15g fast-acting carbohydrate; pupil must leave classroom accompanied; call parent if no improvement in 15 mins*	
Action when urgent / critical low alert activates *Emergency steps — e.g. do not leave the individual alone; call 999 if unresponsive; location of glucagon or emergency medication*	
Action for other alert types (cardiac, seizure, etc.) *Describe response for any other alert type generated by this device*	
Emergency Contacts	
Parent / carer — primary contact	
Parent / carer — secondary contact	
GP / specialist — emergency contact	
Location of emergency medication / supplies *e.g. glucagon kit in named first aid cupboard; spare sensor in office, labelled box*	

Section 5 — Data Protection and Device Governance

Question	Response / Notes
Does the companion device / app transmit or store any data beyond the immediate clinical monitoring function?	☐ Yes ☐ No ☐ N/A
Has the school been made aware of what personal or health data the app collects and to whom it is transmitted?	☐ Yes ☐ No ☐ N/A
Is the device or companion app connected to any personal social media, messaging or email account?	☐ Yes ☐ No ☐ N/A
Has the individual / parent been informed that the companion device must not be used for any purpose other than medical monitoring while on school premises?	☐ Yes ☐ No ☐ N/A
Have any data protection concerns been referred to the Trust DPO?	☐ Yes ☐ No ☐ /A
Notes on any data protection considerations arising from this device	

Section 6 — Risk Summary and Mitigations

For each risk identified below, confirm the mitigation in place. Add rows for any additional risks specific to this individual.

Risk	Mitigation in Place	Residual Risk Level	Owner
Device alert not seen or heard during the school day, leading to delayed clinical response	*State specific arrangement — e.g. teacher has visual line of sight; receiver with named staff member; vibration alert enabled*	Low / Medium / High	
Device malfunction or loss of connectivity during the school day	*e.g. spare sensor / receiver on site; protocol for reverting to finger-prick testing; parent notified same day*	Low / Medium / High	
Companion device used for non-medical purposes contrary to this policy	*e.g. device in monitoring-only mode; parental agreement in place; companion device held by named staff member for younger pupils*	Low / Medium / High	
Staff unfamiliarity with alert protocols in cover lessons / with supply staff	*e.g. laminated one-page protocol in classroom; cover supervisor briefed; first aider notified at start of day*	Low / Medium / High	
Individual excluded from activities (PE, trips) due to device, potentially breaching Equality Act 2010	*e.g. reasonable adjustments agreed with PE lead and trip organiser; documented in this risk assessment*	Low / Medium / High	
Additional risk (specify):			

Section 7 — Sign-Off and Review Record

Initial Approval	
Headteacher signature	
Printed name	
Date approved	*DD / MM / YYYY*
Copy shared with relevant staff?	☐ Yes — names/roles listed in Section 3 ☐ No — reason:
Copy placed on individual's school file?	☐ Yes ☐ No — reason:

Parental / Individual Agreement (Pupil Assessments)	
Parent / carer name	
I confirm the above arrangements have been discussed with me and I agree to the conditions set out in this risk assessment	*Signature and date*
Pupil acknowledgement (where age-appropriate)	*Signature / initials of pupil (optional)*

Review History		
Review date	**Reviewed by**	**Changes made (summary)**

Guidance Notes for Completing This Form

This form satisfies the risk assessment obligation under Health and Safety at Work etc. Act 1974 and supports the Trust's duty to make reasonable adjustments under the Equality Act 2010. It should be read alongside the individual's Healthcare Plan (if one exists). Where there is any clinical uncertainty, advice should be sought from the individual's healthcare team before the assessment is finalised. Contact the COO for further support.

Document reference: Fioretti Trust — Appendix A to Personal Devices and Mobile Technology Policy (2026) |Review cycle: Annual