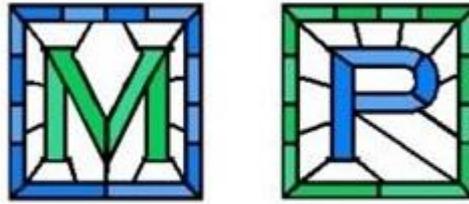


**Monkfield Park**



**Primary School and  
Care & Learning Centre**

# **Safeguarding Code of Conduct**

*Incorporating the County Council's model policies on social networking, blogs, use of mobile phones and cameras and the sharing of images*

Approved by the Governing Body in:

**Autumn 2015**

This code of conduct should be read in conjunction with the Safeguarding Policy.

## 1. Introduction

- 1.1 This Safer Care Code of Conduct ('the Code') sets out the professional standards expected and the duty upon staff, governors and volunteers to abide by it. This Code of Conduct sets out the standards expected and the duty upon staff, volunteers and governors to abide by it. All staff, governors and volunteers have a duty to keep children and themselves safe and to protect them from physical and emotional harm. This duty is, in part, exercised through the development of respectful, caring and professional relationships between adults and children and behaviour by adults that demonstrate integrity, maturity and good judgment. Following this Code of Conduct will help to safeguard staff, governors and volunteers from being maliciously, falsely or mistakenly suspected or accused of professional misconduct in relation to children.
- 1.2 Staff, governors and volunteers must feel able to raise issues of concern and everyone must fully recognise the duty to do so particularly in terms of child protection. Adults have a duty to report any child protection or welfare concerns to a designated member of staff. Anyone who has concerns should report them to the Designated Person as detailed in a notice at the front of school and in volunteer procedures. A member of staff who, in good faith, "whistleblows" or makes a public interest disclosure will have the protection of the relevant legislation
- 1.3 This Code of Conduct cannot provide an exhaustive list of what is, or is not, appropriate behaviour for staff, governors or volunteers. However, it does highlight behaviour that is illegal, inappropriate or inadvisable in relation to children. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the child where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour in order to secure the best interests and welfare of the children in their charge.
- 1.4 Any member of staff who is found to have committed a breach of this Code will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in dismissal. The governing body will take a strict approach to serious breaches of this Code. This Code of Conduct forms part of Monkfield Park's disciplinary rules for staff. A serious breach of the Code will be regarded as gross misconduct. A less serious breach may result in a disciplinary warning.
- 1.5 Where an allegation of abuse is made against a member of staff the governing body will follow the guidance set out in Safeguarding Children and Safer Recruitment in Education (published by the DCFS and in force from January 2007) and the statutory guidance within 'Dealing with Allegations of Abuse against Teachers and other Staff' (published by the Department of Education July 2011) where it is alleged that a member of staff or a volunteer or a governor has:
  - behaved in a way that has harmed a child, or may have harmed a child;
  - possibly committed a criminal offence against or related to a child; or,
  - behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

## **2. Expected Professional Standards**

- 2.1 All staff, governors and volunteers as appropriate to the role and/or job description of the individual, must:
- place the well-being and learning of children at the centre of their professional practice.
  - have high expectations for all children, be committed to addressing underachievement, and work to help children progress regardless of their background and personal circumstances.
  - treat children fairly and with respect, take their knowledge, views, opinions and feelings seriously, and value diversity and individuality.
  - model the characteristics they are trying to inspire in children, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people.
  - respond sensitively to the differences in the home backgrounds and circumstances of children, recognising the key role that parents and carers play in children' education.
  - seek to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support the young person's learning and well-being in and out of the school or setting.
  - reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues.
  - The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.

## **3. Confidentiality**

- 3.1 As data controllers, all schools are subject to the Data Protection Act 1998. In addition, teachers owe a common law duty of care to safeguard the welfare of their children. This duty is acknowledged in the provisions governing disclosure of information about children.
- 3.2 Members of staff and governors may have access to confidential information about children in order to undertake their responsibilities. In some circumstances the information may be sensitive and/or confidential. Confidential or personal information about a child or her/his family must never be disclosed to anyone other than on a need to know basis. In circumstances where the child's identity does not need to be disclosed the information should be used anonymously. Information must never be used to intimidate, humiliate, or embarrass the child.
- 3.3 There are some circumstances in which a member of staff may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay to those with designated child protection responsibilities.
- 3.4 Confidential information about children must be held securely. Confidential information about children must not be held off the school site other than on security protected school equipment. Information must only be stored for the length of time necessary to discharge the task for which it is required.

- 3.4 If a member of staff is in any doubt about the storage of sharing of information s/he must seek guidance from a senior member of staff. Any media or legal enquiries must be passed to senior management.

#### **4. Propriety, Behaviour, Reputation and Appearance**

- 4.1 All staff has a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, children and the public in general. An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting or bring the school into disrepute. The misuse of drugs, alcohol or acts of violence would be examples of such behaviour.
- 4.2 A person's dress and appearance are matters of personal choice and self-expression. However staff, governors and volunteers must ensure they are dressed in ways which are appropriate to their role and not likely to be viewed as offensive, revealing or sexually provocative and specifically should not distract, cause embarrassment or give rise to misunderstanding, should be culturally sensitive and free of any political or otherwise contentious slogans, and not considered to be discriminatory. Those who dress or appear in a manner which may be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct.
- 4.3 Personal property of a sexually explicit nature such as books, magazines, DVDs or such material on any electronic media must not be brought onto or stored on the school premises.
- 4.4 Social networking sites and blogging are extremely popular. Staff, governors and volunteers must not post material which damages the reputation of Monkfield Park or which causes concern about their suitability to work with children and young people. Those who post material which could be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct which may be dealt with under the school's disciplinary procedure.

#### **5 Sexual Contact with Children and Young People and Abuse of Trust**

- 5.1 A relationship between an adult and a child or young person is not a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Adults should maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report any incident with this potential.
- 5.2 Any sexual behaviour, whether homosexual or heterosexual, by a member of staff, volunteer or governor with or towards a child or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. Where a person aged 18 or over is in a specified position of trust with a child or young person under 18 years, the Sexual Offences Act 2003 makes it an offence for that person to engage in

sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity

- 5.3 Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. 'Working Together to Safeguard Children' defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening'.
- 5.4 Staff, governors and volunteers must not have sexual relationships with children, have any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e verbal comments, letters, notes, texts, electronic mail, phone calls, social networking contact or physical contact. The adult should not make sexual remarks to, or about, a child or young person or discuss their own sexual relationships with or in the presence of children. Staff, governors and volunteers should take care that their language or conduct does not give rise to comment or speculations. Attitudes, demeanour and language all require care and thought.
- 5.5 There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person, and manipulate that relationship so that sexual abuse can take place. Staff and volunteers should be aware that conferring special attention without good reason or favouring a child has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

## **6. Infatuations and Crushes**

- 6.1 A child or young person may develop an infatuation with an adult who works with them. A member of staff or volunteer, who becomes aware that a child may be infatuated with him/herself or a colleague, must report this without delay to a senior colleague so that appropriate action can be taken to avoid any hurt, distress or embarrassment. The situation will be taken seriously and the adult should be careful to ensure that no encouragement of any kind is given to the child. It should also be recognised that careless and insensitive reactions may provoke false accusations
- 6.2 Examples of situations which must be reported are given below:
- Where a member of staff or volunteer is concerned that he or she might be developing a relationship with a child which could have the potential to represent an abuse of trust,
  - Where a member of staff or volunteer is concerned that a child is becoming attracted to him or her or that there is a developing attachment or dependency.
  - Where a member of staff or volunteer is concerned that actions or words have been misunderstood or misconstrued by a child such that an abuse of trust might be wrongly suspected by others.
  - Where a member of staff or volunteer is concerned about the apparent development of a relationship by another member of staff or volunteer, or receives information about such a relationship, they must report this to the designated person.

## 7 Gifts

- 7.1 It is against the law for public servants to take bribes. Staff, governors and volunteers need to take care that they do not accept any gift that might be construed by others as a bribe, or lead the giver to expect preferential treatment. There are occasions when children or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.
- 7.2 Personal gifts must not be given to children. This could be misinterpreted as a gesture either to bribe, or single out the young person. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a child should be consistent with Monkfield Park's behaviour policy, recorded, and not based on favouritism.

## 8 Social Contact and Social Networking

### 8.1 Definitions

The term '**blog**' is short for 'web log'. A blog is an online diary detailing personal insights and experiences. This is shared with an online audience.

A **social network site** is a website, which allows individuals to construct a public or semi-public online profile and to connect with others who share similar interests and views.

- 8.2 Employees must not access personal blogs/social networking sites on work premises or use the setting's Internet systems or email address for their own use, without prior agreement or in accordance with the setting's policy.

- 8.3 The setting does not condone employees writing about their work on social networking sites or web pages and asks them not to do so. If employees choose to do so, they are expected to follow the rules below.

Staff **must not**:

- disclose any information that is confidential to the setting or any third party or disclose personal data or information about any individual child, colleague or service user, which could be in breach of the Data Protection Act.
- disclose the name of the setting or allow it to be identified by any details at all. This includes posting photos of **children and young people**, the premises or events with work colleagues.
- link their own blogs/personal web pages to the setting's website.
- make defamatory remarks about the setting, colleagues or service users.
- misrepresent the setting by posting false or inaccurate statements.

**Communication with children and young people, by whatever method, should always take place within clear and explicit professional boundaries. Staff should avoid any misinterpretation of their motives or any behaviour that could be construed as grooming.**

Staff **should not**:

- give their personal email details to children, young people and parents who use the setting.
- send social networking site 'friend requests' to, or accept them from, children who use the setting.

Staff should consider the appropriateness of friend requests from colleagues and parents.

Failure to adhere to the rules and guidelines in this policy may be considered misconduct and could lead to disciplinary and /or criminal investigations.

**Remember that anything posted online could end up in the public domain to be read by children, parents or even future employers – so be careful what you post and who you post it to. For example, posting explicit pictures of yourself could damage your reputation and that of your profession and organisation. Parents may question your suitability to care for children.**

- 8.4** Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones text messaging, emails, digital cameras, videos, web-cams, websites and blogs. Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. If a child seeks to establish social contact, or if this occurs coincidentally, the adult should exercise his or her professional judgment in making a response and should ensure that all communications are transparent and open to scrutiny.
- 8.5** Staff and volunteers must not give their personal details such as home/mobile phone number; home or e-mail address to children unless the need to do so is agreed in writing with senior management.
- 8.6** It is recommended that staff ensure that all possible privacy settings are activated to prevent students from making contact on personal profiles and to prevent students from accessing photo albums or other personal information which may appear on social networking sites.

## **8 Physical Contact and Personal Privacy**

- 9.1** There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, but it is crucial that they only do so in ways appropriate to their professional role. When physical contact is made with children this should be in response to their needs at the

time, of limited duration and appropriate given their age, stage of development, gender, ethnicity and background. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child.

- 9.2 Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. If a member of staff or volunteer believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible in the school's incident book, and, if appropriate, a copy placed on the child/young person's file.
- 9.3 Physical contact, which occurs regularly with a child or children, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to children with SEN or physical disabilities). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the child's permission before initiating contact. Staff should listen, observe and take note of the child's reaction or feelings and – so far as is possible - use a level of contact which is acceptable to the child for the minimum time necessary.
- 9.4 There may be occasions when a distressed child needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.
- 9.5 Where a member of staff has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from a senior manager.
- 9.6 Some staff, for example, those who teach PE and games, or who provide music tuition will on occasions have to initiate physical contact with children in order to support a child so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the child's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child
- 9.7 Children are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard children, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the children concerned and sensitive to the potential for embarrassment.
- 9.8 Staff with a job description which includes intimate care duties will have appropriate training and written guidance. No other member of staff or volunteer should be involved in intimate care duties except in an emergency.

## **10 Behaviour Management and Physical Intervention**

- 10.1 All children have a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools. Staff and volunteers must not use any form of degrading treatment to punish a child. The use of sarcasm,

demeaning or insensitive comments towards children is not acceptable in any situation. Shouting aggressively is not acceptable in any situation. Deliberately intimidating children is not acceptable in any situation. Any sanctions or rewards used should be part of the behaviour management policy.

- 10.2 Physical intervention can only be justified in exceptional circumstances. Updated non-statutory guidance which relates to the Education and Inspections Act 2006 is available from the Department of Education website. See 'Guide for Heads and School Staff on behaviour and discipline (including reasonable force) for maintained schools' and 'Use of reasonable force -advice for Head Teachers, Staff and Governing Bodies for all Schools and Academies. Staff may legitimately intervene to prevent a child from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff should have regard to the health and safety of themselves and others. Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence. Monkfield Park has a separate policy on the use of physical intervention which forms part of this Code of Conduct.
- 10.3 All schools must have trained first aiders/appointed persons. Staff must have had the appropriate training before administering first aid or medication except in an emergency.

## **11 One to One Situations and Meetings with Children**

- 11.1 One to one situations have the potential to make children/young persons more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with children may also be more vulnerable to unjust or unfounded allegations being made against them. Staff must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and children are met. Managers should undertake a risk assessment in relation to the specific nature and implications of one to one work for each worker and child. Where such a meeting is demonstrably unavoidable it is advisable to avoid remote or secluded areas of Monkfield Park and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis.
- 11.2 Pre-arranged meetings with children away from Monkfield Park's premises or outside usual opening times are not permitted unless approval is obtained from their parent/ guardian and the head teacher, Care & Learning Centre Manager or other senior colleague with delegated authority.
- 11.3 No child or young person should be in or invited into, the home of an adult who works with them, unless the reason for this has been established and agreed with parents/carers and a senior manager/Head teacher.

## **12 Transporting Children**

- 12.1 In certain situations e.g. out of school activities, staff, volunteers or governors may agree to transport children. Wherever possible transport arrangements should be made in advance by a designated member of staff. Wherever possible and practicable transport should be provided other than in private vehicles, with at least one adult additional to the driver acting as an escort.
- 12.2 Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded.
- 12.3 It is inappropriate for staff to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with parents/carers.
- 12.4 There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

### **13 Educational Visits and School Clubs**

- 13.1 Staff and volunteers should take particular care when supervising children in the less formal atmosphere of an educational visit, particularly in a residential setting, or after-school activity. Staff and volunteers remain in a position of trust and the same standards of conduct apply. Monkfield Park has a policy on educational visits which forms part of this Code of Conduct.

### **14 Curriculum**

- 14.1 Many areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.
- 14.2 The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to children's questions can require careful judgement and staff must take guidance in these circumstances from a senior member of staff. Staff and volunteers must not enter into or encourage inappropriate discussion about sexual activity or behaviour.
- 14.3 The governing body is required by law to have a policy on sex and relationships education and it forms part of this Code of Conduct.

### **15 Photography, Videos and other Creative Arts**

- 15.1 Please refer to the school's guidance on the use of images and the consent forms therein.
- 15.2 Many activities involve recording images. These may be undertaken as part of the curriculum, extra-curricular activities, for publicity, or to celebrate achievement. The Data Protection Act 1998 affects the use of photography. An image of a child is personal data and it is, therefore, a requirement under the Act that consent is obtained from the parent of a

child for any images made such as those used for school web sites, productions or other purposes.

- 15.3 Staff need to be aware of the potential for such images to be misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.
- 15.4 Staff should remain sensitive to any child who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to take into account the wishes of the child, remembering that some children do not wish to have their photograph taken.
- 15.5 Adults should only use equipment provided or authorised by Monkfield Park to make/take images and should not use mobile telephones or any other similar devices to make/take images.
- 15.6 When using a photograph the following guidance must be followed:
- photographs or images should be deleted once their function has been served
  - if the photograph is used, avoid naming the child
  - if the child is named, avoid using the photograph
  - images must be securely stored and used only by those authorised to do so.
  - be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded
  - ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose.
  - ensure that all images are available for scrutiny in order to screen for acceptability
  - be able to justify the images made
  - do not make images in one to one situations.
  - do not take, display or distribute images of children unless there is consent to do so.
  - Images must be used in accordance with the Data Protection Act 1998 (please refer to the setting's document 'Guidance for settings on the use of Images, Mobile Phones and Cameras in accordance with the Data Protection Act 1998').
  - Cameras and recording equipment should only be used where two or more staff members are present.
- 15.7 It is not appropriate to take photographs of bruising or injuries on a child for child protection concerns. In these cases, the 'Logging Concern Form and Body Map' must be used.
- 15.8 Monkfield Park has additional guidance on the use of images which includes a consent form. The guidance forms part of this Code of Conduct.

## **16 Internet Use and Electronic Communication**

- 16.1 Monkfield Park has a separate policy on internet use, electronic communication and security which forms part of this Code of Conduct. School e-mail systems should only be used in accordance with this policy.
- 16.2 Under no circumstances should adults at Monkfield Park access inappropriate images. Deliberately accessing pornography on school and Care & Learning Centre equipment will be treated as gross misconduct and may be a criminal offence. Accessing indecent images of children on the internet, and making, storing or disseminating such material, is illegal and is likely lead to criminal prosecution and may result in barring from work with children and young people.
- 16.3 Staff and volunteers must ensure that children are not exposed to any inappropriate images or web links. Staff and volunteers must ensure that children have appropriate controls with regard to access and personal passwords should be kept confidential.

## **17 Sharing Concerns and Recording Incidents**

- 17.1 All staff, volunteers and governors must be vigilant and share concerns and report incidents . The following is a non-exhaustive list of behaviours which must be shared with a senior member of staff.

An adult who:

- Allows a child/young person to be treated badly and pretends not to know it is happening
- Gossips/shares information inappropriately
- Demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- Dresses in a way which is inappropriate for the job role
- Does not treat children fairly - demonstrates favouritism
- Demonstrates a lack of understanding about personal and professional boundaries
- Uses his/her position of trust to intimidate, threaten, coerce or undermine
- Uses his/her position of trust to undermine British values or influence children with radical or extreme views
- Appears to have an inappropriate social relationship with a child or children
- Appears to have special or different relationships with a child or children
- Seems to seek out unnecessary opportunities to be alone with a child.

## **18 Use of personal mobile phones and cameras by staff and volunteers**

- 18.1 Personal mobile phones and cameras should only be used outside of working hours and never whilst children are present *unless expressly agreed by the Headteacher or C&LC manager.*
- 18.2 Personal mobile phones and cameras should be stored in staff lockers or in the staff room.
- 18.3 In very unusual circumstances, such as a family emergency, staff and volunteers should seek permission from the manager or employer to use their mobile phone.

- 18.4 If a staff member, student or volunteer must use their mobile phone (see above) this should be away from the children and ensuring that staff supervision levels are not compromised.
- 18.5 Staff, students or volunteers who ignore this policy and use a mobile on the setting premises without permission may face disciplinary action.
- 18.6 The setting's main telephone number can be used for emergencies by staff or volunteers or by people who need to contact them.
- 18.7 In circumstances such as outings and off site visits, staff will agree with their manager the appropriate use of personal mobile phones in the event of an emergency.
- 18.8 Where there is a suspicion that the material on a mobile phone may be unsuitable and may constitute evidence relating to a criminal offence, the 'Allegations of Abuse' process will be followed (please refer to the setting's 'Safeguarding and Child Protection Policy').
- 18.9 Staff, students or volunteers remain responsible for their own property and will bear the responsibility of any losses.

## **19 Use of the setting's mobile phone, camera and recording equipment**

- 19.1 The setting's mobile phone must only be used for work related matters.
- 19.2 In circumstances where there is a suspicion that the material on the setting's mobile phone may be unsuitable and provide evidence relating to a criminal offence, the 'Allegations of Abuse' process will be followed (please refer to the setting's 'Safeguarding and Child Protection Policy').
- 19.3 The setting's mobile phone remains the property of the setting at all times and should not be taken off of the premises (with the exception of visits and outings).