

Mobile Phone Use Policy: Supporting Emotional Wellbeing and Equality

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Explanatory note

Red Balloon of the Air (RBAir) is part of Red Balloon Educational Trust (RBET), an educational charity that runs registered independent schools and an alternative provision (RBAir). RBAir is commissioned by local authorities as an alternative provider to provide specialist programmes for learners aged 11-19 with Special Educational Needs and Disabilities (SEND) requirements who have disengaged from their mainstream school.

All learners experience significant difficulties in managing their mental health, commonly resulting from diagnosed conditions including Autism Spectrum Condition (ASC), Attention Deficit Hyperactivity Disorder (ADHD), and associated emotional and clinical issues. RBAir delivers tailored sessional programmes of up to 15 hours per week through a hybrid model of online and face-to-face learning.

RBAir's provision model differs significantly from traditional school settings in ways that are relevant to mobile phone management:

- Learners attend up to 15 hours of provision that is spread across the week, delivered both online and in person (individually or in small groups of 3-4) rather than full on-site school days.
- Learners are always supervised by staff during in-person sessions: there are no unsupervised breaktimes, lunchtimes, or transitions between sessions.
- Small group sizes (1:1 or 1:3-4 staff ratios) enable active real-time monitoring and management.
- For many learners with ASC, ADHD, and anxiety, mobile phones serve as essential self-regulation tools (calming apps, music, sensory stimulation).

The RBET Mobile Phone Use Policy provides a framework to support each of the RBET Centres in meeting both the DfE guidance on mobile phones in schools (February 2026) and Ofsted expectations relating to safeguarding and the promotion of a focused learning environment.

RBAir concurs with the following statement in the RBET Policy:

RBET recognises that mobile phones can present significant risks to safeguarding, wellbeing and learning. This policy ensures a phone-free day by default, while allowing carefully controlled exceptions to meet medical, SEND and safeguarding needs in accordance with national guidance and inspection expectations.

Due to the specific nature of the provision at RBAir and the complex needs of the learners attending, this RBAir policy aims to ensure that SEND needs for all learners, including statutory EHCP outcomes where applicable, are met, and that wellbeing and engagement are at the forefront of the management of mobile phone usage at RBAir.

The following policies and legislation are cornerstones of our approach to the use of technologies in the provision:

- Keeping Children Safe in Education – (KCSiE 2026)
- Equality Act (2010)
- RBAir Safeguarding and Child Protection Policy
- RBAir Behaviour for Learning Policy
- RBET Online Safety Policy
- RBAir SEND Policy
- RBAir Child-on-Child Abuse Policy
- RBET Equality Information Policy

1. Policy statement

RBAir, as a therapeutic alternative provider, recognises that for some learners - particularly those experiencing high anxiety, separation anxiety, trauma, or mental health difficulties - limited and supported access to a mobile phone may be a reasonable adjustment that enables them to access education, feel emotionally regulated and attend safely.

This policy aims to:

- create a **calm, safe, and purposeful learning environment**;
- safeguard all learners and staff;
- comply with **Department for Education (DfE) national guidance**;
- uphold duties under the **Equality Act 2010**;
- balance wellbeing needs with learning, behaviour and safeguarding priorities.

The default position nationally is that schools should be mobile phone-free environments; however, **DfE guidance explicitly allows exceptions** where necessary for individual learners' needs.

2. National context and guidance

2.1 Department for Education guidance

The DfE guidance *Mobile phones in schools* (updated February 2026) states that:

- schools should be **mobile phone-free by default**;
- **exceptions may be made** for specific learners based on **SEND, disability, medical or safeguarding needs**;
- any permitted use should be **clearly defined, risk assessed and supervised**.

This policy reflects the '**by exception**' approach recommended by DfE and is embedded within our behaviour and safeguarding frameworks.

2.2 Equality Act 2010

Under the Equality Act 2010:

- anxiety disorders and mental health conditions may meet the legal definition of a **disability**;
- schools have a duty to make **reasonable adjustments**;
- adjustments include changes to **policies and practices**, not only physical adjustments;
- the duty is **anticipatory**, meaning schools must plan in advance rather than reactively.

For some learners, **controlled access to a mobile phone** (e.g. contact with home, emotional regulation tools) may be a legitimate reasonable adjustment to support engagement in education where learners have not previously attended school. For older learners, i.e. those aged 16 or over, access to a mobile phone may be constructively used to support academic study.

2.3 Safeguarding duties

All practice relating to mobile phone use and online safety must be consistent with **Keeping Children Safe in Education (KCSiE, 2026)** and online safety responsibilities:

- Prevent misuse, recording, or online harm
- Ensure staff oversight and clear boundaries
- Respond proportionately to safeguarding concerns

2.4 Legal hierarchy and reasonable adjustments

The Equality Act 2010 is primary legislation and takes precedence over statutory guidance. Under section 20 of the Equality Act 2010, schools have a duty to make reasonable adjustments for disabled learners, including:

- changing policies, criteria or practices that put disabled pupils at a substantial disadvantage;
- providing auxiliary aids and services.

The DfE guidance *Mobile phones in schools* (updated February 2026) explicitly acknowledges this, stating that ‘schools should consider individual pupil needs, including pupils with special educational needs (SEN)’ and that ‘allowing pupils with disabilities a mobile phone, where it’s necessary due to the nature of their disability, may be considered a reasonable adjustment under the Equality Act 2010’.

At RBAir, all learners have SEND. For many learners with ASC, ADHD, and anxiety, mobile phones are essential self-regulation tools. A blanket ban would put these learners at a substantial disadvantage and could therefore be discriminatory under the Equality Act 2010.

RBAir's individualised approach via Individual Provision Plans (IPPs) and Risk Management Plans (RMPs) ensures that reasonable adjustments are made for each learner, in compliance with the Equality Act 2010, while maintaining robust safeguarding measures.

3. Scope

This policy applies to:

- all RBAir learners aged 11-19 (on-site and accessing provision from home);

- all RBAir staff, trustees and volunteers;
- parents/carers.

Devices covered:

- Mobile phones and smartphones
- Smartwatches with messaging, calling, internet, or recording capability
- Headphones/earbuds (wired or wireless)

‘During sessions’ means:

- from the start to the end of a timetabled session (online or in-person);
- during supervised RBAir activities or trips.

4. General expectations

- Mobile phones are not routinely used in sessions.
- Phones are not used unsupervised during in-person sessions.
- Phones are never used for social media, gaming, photography or recording unless directed by staff.
- All permitted use is individual, planned, time-limited and reviewed.

5. Permitted use as a reasonable adjustment

5.1 Eligibility

Permitted use may apply where:

- a learner has **high anxiety or separation anxiety**;
- there is a **diagnosed or emerging mental health need**;
- a phone supports **attendance, emotional regulation or crisis prevention**;
- the adjustment is documented through the learner’s:
 - Individual Support Plan
 - SEND Support Plan or EHCP
 - Reintegration or attendance plan.

This reflects DfE guidance, and the Equality Act 2010 which states that policies must consider SEND and disability needs.

5.2 Acceptable uses

Permitted use may include:

- brief, planned contact with home at agreed times;

- accessing calming apps, grounding tools or therapeutic resources;
- emotional reassurance during periods of acute anxiety;
- transition support (arrival, session changes, end of day);
- for emergency contacts during trips and visits.

Medical and health needs

- Diabetes monitoring, cardiac/neurological monitoring
- Medical alerts or medication reminders
- Communication with medical professionals
- Health tracking apps (where agreed)

Educational purposes

- Research or learning activities (staff directed)
- Recording learning (with explicit staff permission)
- Educational apps (where agreed as part of learning plan)

Individual risk exceptions (DSL approval required)

- Looked-after children with agreed contact arrangements
- Young carers with emergency responsibilities
- Learners subject to child protection plans where phone access is protective
- Learners at risk of going missing
- Other exceptional circumstances assessed by DSL

Emergencies

- Under explicit staff instruction during serious incidents, lockdowns, evacuations or emergencies

All approved uses are documented in the learner's IPP and/or RMP.

5.3 Conditions of use

All approved use must:

- be agreed in advance with staff and parents/carers;
- be supervised or monitored by staff;
- take place at **specified times only**;
- be reviewed regularly and reduced where appropriate.

6. Safeguarding and risk management

To safeguard all learners:

- Learners are never left unsupervised - staff monitor phone use in real-time in small groups (1:1 or 3-4); session-based attendance means no unsupervised break/lunch times.
- All learners complete a mandatory six-week Online Safety induction and sign RBAir's Learner ICT Acceptable Use Agreement before their placement commences. If a learner does not complete the induction, despite all reasonable adjustments and support being provided, their placement may be terminated following a review.
- Individual risk assessment via IPP and RMP – these document the learner's needs, risks, approved/prohibited uses, and staff strategies (reviewed termly).
- Zero-tolerance approach to child-on-child abuse - all concerns reported immediately via CPOMS to DSL/DDSL; trauma-informed, supportive response.
- Phones may be stored securely in a lockable phone pouch (provided by RBAir) when not in use and kept with the young person where agreed.
- Cameras, video, audio recording, and internet access may be restricted.
- Any safeguarding concerns are managed in line with:
 - RBAir Safeguarding and Child Protection Policy;
 - RBET Online Safety Policy;
 - RBAir Behaviour for Learning Policy.

Misuse may lead to withdrawal of the adjustment, following a review and consideration of the learner's needs.

7. Explicitly prohibited uses

RBAir has a zero-tolerance approach to child-on-child abuse, including cyberbullying, sexual harassment, sharing nudes/semi-nudes, up-skirting, and AI-generated harmful content.

At no time are learners permitted to:

- **record others without consent** - whilst at the Centre, at no time are learners permitted to film, photograph, or record others unless specifically directed to do so by staff;
- **engage in up-skirting** (a criminal offence under the Voyeurism (Offences) Act 2019);
- **bully, harass or intimidate (including cyberbullying)** - whilst at the Centre, learners are not permitted to message peers on their personal devices, except

where this has been agreed as a reasonable adjustment (e.g. for learners with situational mutism) and is documented in their IPP/RMP and supervised by staff;

- **access inappropriate content** - whilst at the Centre, at no time are learners permitted to access social media, use devices for gaming or entertainment (except music, white noise or apps agreed as reasonable adjustments for self-regulation), or use smartwatches with messaging features;
- **share personal/sensitive information** about themselves or others, enter login details or personal data into AI tools;
- **use AI inappropriately** e.g. create deepfakes, pornographic images, plagiarise, bully, share misinformation;
- **facilitate criminal activity or use during exams** (unless agreed access arrangements).

These prohibited uses apply to all learners both on-site and off-site, including learners accessing provision from home.

8. Roles and responsibilities

RBAir staff will follow the principle of **‘Right Place - Right Time - Right Use’** to ensure that learners are aware of the boundaries around mobile phone usage and the alignment with effective behaviour for learning strategies. Link Mentors are in a unique position to support learners to manage the use of phones and other technologies appropriately and have a specific role to play in the way in which young people negotiate their own responses to education.

Staff

Staff will:

- lead by example in the restricted use of their own phones;
- apply the policy consistently and compassionately;
- ensure permitted use aligns with individual support plans;
- monitor and record use where appropriate.

Link Mentors

Link Mentors work very closely with learners and families in order to re-engage them with their education and the learning environment. Learners come to RBAir to re-connect with others in a safe and controlled way. Link Mentors structure their return to a supportive and carefully managed learning programme. This often involves

negotiating separation from the home and trusted adults and graduated exposure to aspects of education that they have turned away from in the past. Therefore, there may be specific circumstances where the use of a mobile phone may be needed for the following reasons, which the Link Mentor will help to facilitate:

- Learners with situational mutism often communicate by text with staff and other learners when they are in a face-to-face learning situation. This is a reasonable adjustment to help them communicate.
- Some medical conditions are monitored by a phone app, such as diabetes or those with heart conditions.
- Learners with high levels of separation anxiety may want to track how far away their taxi is, they may have to add a code to an App if a taxi is booked for a collection, or be aware how long it will take a parent/carer to arrive to pick them up.
- Some neurodivergent learners use Apps to help them manage their anxiety, such as 'Brain in Hand'.
- During travel training sessions, learners will use travel apps to plan journeys by bus or train.
- Learners may need a mobile phone for financial transactions when out at work experience or on an extended trip or visit.
- Learners may need to use music, white noise, or chosen apps to self-regulate between sessions or when a session has been overwhelming.

Learners across the age ranges will be supported to develop safe ways of managing technologies, both at RBAir and at home. RBAir runs as an integrated community and therefore all members will adhere to the principles of appropriate use of phones in the environment.

Learners

RBAir learners will:

- use phones **only as agreed**;
- follow staff instructions at all times;
- agree to the boundaries and allowances as stated in the IPP and RMP.

Application to learners under and over 18

Learners under 18

Mobile phone management is part of safeguarding and SEND provision, documented in each learner's IPP and RMP. Reasonable adjustments are made under the Equality Act 2010 where appropriate.

Learners aged 18+

As adults, learners aged 18+ have different legal rights. Mobile phone expectations are agreed as part of their IPP and RMP and form part of the conditions of attendance at RBAir. The same individualised, trauma-informed approach applies, recognising both their adult status and their SEND needs. Adult learners are expected to engage collaboratively with staff in managing phone use to support their learning and wellbeing.

Note on post-16 learners

While DfE guidance allows schools to consider whether sixth form students should be permitted limited mobile phone access reflecting their increased independence, RBAir applies an individualised approach to all learners aged 11-19. This is because all RBAir learners have SEND, and individual needs (not age) determine appropriate mobile phone use via IPP and RMP.

Parents/Carers

Parents/Carers of learners at RBAir will:

- support the agreed arrangements;
- avoid unplanned contact during sessions.

All members of the RBAir community will respect the rights of others in relation to mobile phone use and will be encouraged to understand their function as a tool to promote independence and self-reliance. All members will acknowledge the potential harm that unlimited use can cause, and critical thinking skills will be promoted to manage the pressures that social media, AI and gaming might bring in the wider aspects of life and society. Learners will be encouraged to talk about the impact and benefits of technologies, and their voices will be represented in policy formation.

9. Learners accessing provision from home

For learners accessing provision from home (online sessions), learners are expected to keep phones off and away during sessions. Explicitly prohibited uses as outlined in section 7 of this policy apply to all learners both on-site and off-site, including RBAir learners in their homes during sessions.

RBAir recognises that:

- we cannot physically control phone use in learners' homes;
- learners may need phones nearby for comfort or anxiety management;
- a punitive approach could disengage vulnerable learners who are already at risk of not accessing education.

Staff will:

- build relationships and encourage engagement;
- discuss expectations with learners and families at the start of placement;
- intervene supportively if phones distract from learning (e.g. 'I've noticed you're looking at your phone – is everything okay? Can we refocus on the session?');
- report concerns if phone use indicates safeguarding risks (via CPOMS);
- work with families to support appropriate boundaries;
- offer breaks if learners need time to regulate.

Information is documented in RMP: Specific strategies for managing phone use during online sessions.

10. Monitoring and review

- This policy will be reviewed annually.
- Individual learner adjustments will be reviewed at least termly.
- Impact on anxiety, attendance, engagement and independence will be considered.