

Personal Electronic Devices Policy

1. Purpose

Tonacliffe Primary School is committed to safeguarding and promoting the welfare of all children. The purpose of this policy is to establish clear expectations regarding the use of personal electronic devices, recording equipment, image capture technology, sound recording devices, video recording devices, and Artificial Intelligence (AI) technologies on school premises, during educational visits, and at school events.

This policy aims to:

- Protect the privacy, dignity and safety of pupils, staff and visitors.
- Prevent the unauthorised collection, storage, sharing or publication of personal data.
- Ensure compliance with safeguarding requirements, data protection legislation and school procedures.
- Minimise risks associated with emerging technologies, including AI-powered devices and applications.

2. Scope

This policy applies to:

- All pupils.
- Parents, carers and family members.
- School staff.
- Governors.
- Volunteers.
- Contractors.
- Visitors.
- Anyone attending school events or using school premises.

The policy applies whilst on school grounds, during school transport, educational visits, residential visits and any activity organised or supervised by the school.

3. Definitions

For the purpose of this policy, personal electronic devices include, but are not limited to:

Communication Devices

- Mobile phones.
- Smartphones.
- Satellite phones.

- Smart watches.
- Tablets.
- Internet-enabled devices.

Recording Devices

- Cameras.
- Video cameras.
- Dash cameras.
- Body-worn cameras.
- Sound recording devices.
- Dictaphones.

Wearable Technology

- Smart watches.
- Smart glasses.
- Fitness trackers with recording capability.
- AI-enabled wearable devices.

Artificial Intelligence (AI) Technology

Including, but not limited to:

- AI-powered recording devices.
- AI transcription tools.
- AI voice assistants.
- AI image generation applications.
- AI video generation applications.
- AI facial recognition systems.
- AI voice cloning software.
- AI software used to analyse, manipulate, alter or generate images, videos or sound recordings.

4. Responsibilities

Governing Body

The Governing Body is responsible for:

- Approving and reviewing this policy.
- Ensuring compliance with safeguarding and data protection requirements.
- Monitoring implementation of the policy.

Headteacher

The Headteacher is responsible for:

- Day-to-day implementation of this policy.
- Investigating breaches.
- Applying sanctions where necessary.
- Authorising any legitimate use of recording equipment or AI technologies.

Staff

All staff must:

- Follow this policy at all times.
- Maintain professional standards regarding the use of technology.
- Report concerns immediately to the Designated Safeguarding Lead (DSL).
- Ensure school-approved systems are used for educational and administrative purposes.

Parents, Carers and Visitors

Parents and visitors must:

- Comply with all restrictions regarding recording and image capture.
- Respect the privacy of pupils, staff and other families.
- Follow instructions given by school staff regarding the use of electronic devices.

5. Pupil Use of Electronic Devices

Mobile Phones

Pupils may only bring a mobile phone to school where there is a legitimate safety reason agreed by parents and the school.

Where permitted:

- Phones must be switched off before entering the school premises.
- Phones must be handed into the school office and put in the allocated phone box or handed in at the school gate when pupils enter school.
- Phones remain stored throughout the school day by the school office and are given back to pupils as they leave school at the end of the school day.
- Pupils who need their mobile phone due to medical needs e.g. diabetes, will be allowed to keep their phone with them in order to manage their condition.

Smart Watches

Pupils must not bring or wear:

- Smart watches capable of photography.
- Smart watches capable of audio recording.
- Smart watches capable of video recording.
- Smart watches with internet connectivity.
- AI-enabled wearable devices.

To safeguard all members of the school community:

Pupils

Pupils are prohibited from:

- Taking photographs on school premises.
- Recording videos on school premises.
- Making audio recordings on school premises.

- Using AI applications to capture, edit, alter or generate images, videos or sound recordings involving members of the school community.

Parents, Carers and Visitors

Parents, carers and visitors are prohibited from:

- Taking photographs on school grounds without prior authorisation.
- Recording videos at school.
- Making audio recordings of staff, pupils or visitors.
- Live-streaming any school activity.
- Posting images, recordings or videos of pupils other than their own child on social media.
- Using AI technologies to record, analyse, manipulate or distribute images, videos or recordings involving members of the school community.

School events may have separate arrangements communicated in advance by the Headteacher.

7. Staff Use of Photography, Video Recording and Sound Recording

Staff may only take photographs, videos or audio recordings when:

- Required for educational purposes.
- Authorised by the Headteacher.
- Appropriate parental consent has been obtained where necessary.
- Using approved school-owned equipment and systems.

Staff must not:

- Use personal devices to photograph, video or record pupils.
- Store pupil images or recordings on personal devices.
- Share images or recordings through personal social media accounts.
- Create or distribute recordings without legitimate educational or safeguarding reasons.

8. Use of Artificial Intelligence (AI)

The school recognises the increasing availability of AI technology and the potential safeguarding and privacy risks associated with its misuse.

Prohibited Uses

Staff, pupils, parents, carers and visitors must not:

- Use AI tools to generate images of pupils or staff without authorisation.
- Create AI-generated videos depicting members of the school community.
- Create "deepfake" images, audio or videos.
- Use voice-cloning software to imitate staff, pupils or parents.
- Use AI transcription tools to record conversations without consent.
- Upload photographs, recordings or personal information relating to pupils into public AI systems.
- Use AI systems to identify, profile, analyse or monitor individuals without authorisation.

Permitted Uses

AI technologies may only be used:

- For legitimate educational purposes.
- Through school-approved systems.
- Under staff supervision.
- In accordance with safeguarding, GDPR and data protection requirements.

9. Social Media and Distribution of Content

No person may:

- Share photographs of pupils or staff obtained on school premises without permission.
- Upload school recordings to social media platforms.
- Circulate recordings via messaging applications.
- Publish AI-generated content depicting members of the school community.

Any unauthorised publication may be reported to the relevant platform, Local Authority, police or other agencies where appropriate.

10. Safeguarding Concerns

Any concerns involving:

- Unauthorised photography.
- Unauthorised video recording.
- Unauthorised audio recording.
- AI-generated imagery.
- Deepfake content.
- Online misuse of school images or recordings.

must be reported immediately to the Designated Safeguarding Lead or Headteacher.

11. Sanctions

Breaches of this policy may result in:

Pupils

- Confiscation of devices.
- Restriction of privileges.
- Parental meetings.
- Behaviour sanctions in accordance with the Behaviour Policy.

Parents, Carers and Visitors

- Request to delete recordings.
- Removal from school premises.
- Restriction from attending school events.
- Referral to external agencies where appropriate.

Staff

- Investigation under staff conduct procedures.
- Disciplinary action.
- Referral to professional bodies where appropriate.

Serious breaches involving safeguarding concerns, unlawful recording, harassment, misuse of personal data, AI manipulation or online distribution may be referred to the police and other relevant authorities.

12. Monitoring and Review

This policy will be reviewed annually by the Governing Body or sooner if required by changes in legislation, safeguarding guidance or technological developments.

Policy Written: September 2026

Review Date: September 2027

