



Scoil San Treasa

Board of Management

The Rise, Mount Merrion, Co. Dublin A94EK75



Policy on the Use of Personal Tracking Devices by Pupils

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1. Purpose

The Board of Management of Scoil San Treasa recognises that, in certain circumstances, parents/guardians may wish their child to wear or carry a personal tracking device while attending school.

The purpose of this policy is to provide a clear understanding for all regarding the wearing/carrying of personal tracking devices by pupils while attending Scoil San Treasa. The policy seeks to:

- Support pupil safety and wellbeing
- Clarify the respective responsibilities of the school and parents/guardians
- Ensure consistency in decision-making
- Support the school's safeguarding, supervision and risk management procedures
- Ensure compliance with existing school policies
- Ensure that use of personal tracking devices is considered within a risk management framework.

In considering requests relating to personal tracking devices, the Board of Management will apply the principles of risk assessment and risk management outlined by the Health and Safety Authority (HSA) in '*A Guide to Risk Assessments and Safety Statements*'.

2. Scope

This policy applies to personal tracking devices worn or carried by pupils during:

- The school day
- School outings/tours approved by the Board of Management.

Examples of Tracking Devices include but are not limited to: GPS tracking devices, Apple AirTags, Samsung SmartTags, Tile Trackers, Similar location-tracking technologies.

3. Relationship with Existing School Policies

This policy should be read in conjunction with:

- Child Safeguarding Statement and Risk Assessment
- Acceptable Use Policy
- Mobile Phone Policy
- Code of Behaviour
- Bí Cineálta Policy
- Data Protection Policies
- Any relevant Individual Education Plans, Support Plans or Risk Assessments.

The Board of Management notes that the school's Acceptable Use Policy (AUP) generally prohibits pupils from using personal internet-enabled devices, including mobile phones and smartwatches, during the school day.

Approval of a personal tracking device under this policy does not constitute a general exemption from any other school policy.

The school's child Safeguarding procedures and responsibilities remain unchanged and the school does not have access to any information from the tracking device.

4. Tracking Devices and Communication Devices

The Board recognises that modern technologies vary significantly in their functionality. For the purposes of this policy, a distinction is made between tracking devices and communication devices.

a. Tracking Devices

The primary purpose of a tracking device is location tracking and it does not provide the wearer/carrier with the ability to:

- Make or receive telephone calls
- Send or receive messages
- Access the internet/social media platforms
- Record audio or video or take photographs
- Store or transmit content unrelated to their tracking function.

Examples may include, but are not limited to: GPS tracking devices, Apple AirTags, Samsung SmartTags and similar passive tracking devices.

b. Communication Devices

Any device that provides communication, internet access, recording functionality or similar smart-device capabilities may be considered a communication device for the purposes of this policy, regardless of whether it also incorporates location-tracking functionality. Communication devices include, but are not limited to:

- Mobile phones
- Smartphones
- Smartwatches
- GPS watches with calling or messaging functions
- Devices capable of internet access
- Devices capable of audio recording, photography or video recording

Communication devices remain subject to the school's Acceptable Use Policy and Mobile Phone Policy. Approval under this policy shall not be interpreted as approval for a pupil to wear or use a communication device during the school day. Where a device incorporates both tracking and communication functions, the Board of Management reserves the right to determine whether the device is appropriate for use in school.

5. General Principles

- 5.1 The Board acknowledges that parents/guardians may wish their child to wear or carry a personal tracking device as an additional precautionary measure.
- 5.2 Personal tracking devices are regarded as parental support measures.
- 5.3 Personal tracking devices do not form part of the school's safeguarding, supervision, attendance management or pupil management systems.
- 5.4 The use of a personal tracking device does not replace, reduce or alter the school's duty of care towards pupils.
- 5.5 Approval of a personal tracking device for one pupil does not create a precedent or entitlement for any other pupil.

6. Parent/Guardian Responsibilities

Where a personal tracking device is approved, responsibility for the device remains with the parent/guardian. This includes responsibility for:

- Ownership of the device
- Purchase and replacement of the device
- Charging and battery replacement
- Maintenance and repair
- Monitoring and responding to location information generated by the device
- Ensuring the device is suitable for use by the pupil
- Determining whether the pupil wears or carries the device

Parents/guardians remain responsible for ensuring that their use of any tracking device complies with applicable data protection legislation and the manufacturer's terms of use. Parents/guardians shall notify the school where a tracking device is replaced, upgraded or modified. Approval granted under this policy applies only to the specific device approved by the Board of Management.

7. School Responsibilities

The school remains responsible for:

- The supervision, care and welfare of pupils while attending school
- Safeguarding and child protection procedures
- Attendance and collection procedures
- The implementation of school policies and risk management measures
- Responding appropriately to any incident involving a pupil

The school's responsibilities towards a pupil are not transferred to, supplemented by or dependent upon any personal tracking device.

8. Expectations of School Staff

School staff:

- Are not responsible for monitoring, tracking, operating or managing personal tracking devices
- Are not expected to routinely check if a device is attached, charged, operational or being worn
- Are not responsible for monitoring location information generated by a device
- Will continue to supervise pupils in accordance with existing school procedures

If a device is removed by a pupil, becomes detached, is found on school premises or is handed to a member of staff, it will be treated in the same manner as any other item of personal property belonging to a pupil.

9. Loss, Damage and Malfunction

The school cannot guarantee the safety, security or operation of personal tracking devices brought onto school premises. Such matters remain the responsibility of the parent/guardian. Subject to applicable law the school shall not be responsible for:

- Loss or damage to a personal tracking device
- Failure or malfunction of a personal tracking device
- Failure of a device to provide location information

10. Data Protection and Privacy

The school does not collect, monitor, store or process location data generated by personal tracking devices unless required by law. Any location data generated by a tracking device is collected and processed by the parent/guardian and/or the device provider. Parents/guardians remain responsible for ensuring compliance with all applicable data protection and privacy requirements.

11. Parent Agreement

Where approval is sought for a pupil to wear or carry a personal tracking device while attending school, the parent(s)/guardian(s) shall be required to complete and sign the school's '*Personal Tracking Device Parent/Guardian Acknowledgement and Agreement Form*'.

The purpose of this agreement is to ensure that:

- The ownership and management of the device are clearly understood
- The respective responsibilities of the parent(s)/guardian(s) and the school are clearly defined
- The limitations of the school's role in relation to the device are acknowledged
- The parent(s)/guardian(s) understand that the device is a parental support measure and does not form part of the school's safeguarding, supervision, attendance management or pupil management systems.
- The parent(s)/guardian(s) acknowledge that approval of the device does not transfer responsibility for the operation, monitoring or maintenance of the device to the school.

Approval for the use of a personal tracking device shall not take effect until the Parent/Guardian Acknowledgement and Agreement Form has been completed, signed and accepted by the school.

The Board of Management reserves the right to review, amend or withdraw approval where the terms of the agreement are not complied with or where circumstances change.

12. Approval Process

Requests for a pupil to wear or carry a personal tracking device will be considered on an individual basis. The Board of Management may consider:

- The pupil's individual needs
- Relevant professional advice
- Safeguarding considerations
- Insurance advice
- Operational implications for the school
- Existing school policies
- The outcome of a risk assessment
- The functionality of the device and whether it is consistent with the school's Acceptable Use Policy and Mobile Phone Policy.

The Board reserves the right to:

- Approve a request
- Refuse a request
- Impose reasonable conditions
- Review or withdraw approval where circumstances change.

In accordance with the Health and Safety Authority's guidance on risk assessment, each request will be assessed by identifying any relevant hazards, evaluating associated risks and determining appropriate control measures before any approval is granted.

13. Governance

Any approval granted under this policy shall be supported by a documented risk assessment.

The risk assessment shall:

- identify any hazards associated with the proposed arrangement
- assess the potential risks
- identify appropriate control measures
- assign responsibilities to relevant parties
- be reviewed where circumstances change.

The findings of the risk assessment shall inform any decision of the Board of Management regarding the approval, continuation or withdrawal of an arrangement under this policy. The completed risk assessment and signed Parent/Guardian Acknowledgement and Agreement Form shall be retained with the pupil's school records in accordance with the school's record retention procedures.

14. Review

This policy shall be reviewed by the Board of Management at least every three years, or earlier where required by changes in legislation, Department of Education guidance, technological developments, insurance advice or operational needs.

Ratified by the Board of Management on: *14th September 2026*

Review Date: *September 2027*

Signed: *Eoin O'Neill*

Date: *14th September 2026*

Chairperson, Board of Management – Eoin O'Neill

Signed: *Frances Mullin*

Date: *14th September 2026*

Principal – Frances Mullin