



**Federation of
Westminster Special Schools
& Bi-Borough Inclusion Service**

Federation Tracker and Smart Watch Policy (linked to mobile phone policy)

**Approved by Associate Executive Headteacher and Nominated Governor:
February 2026**

To be reviewed: February 2028

Introduction and aims

At the Federation of Westminster Special Schools, we recognise that personal tracking devices including smart phones are an important part of every day lives for our children and young people (CYP), parents/ carers, and staff as well as the wider federation community.

Our policy aims to:

- Set clear guidelines for the use of personal tracking devices for CYP
- Support the Federation's other policies, especially those related to child protection and safeguarding, behaviour, GDPR.

This policy also aims to address some of the challenges posed by the use of personal tracking devices in school such as:

- Risk to child protection
- Data protection issues

What are location trackers and why do we need a policy on their use in the FWSS schools?

Location trackers, like AirTags, are small, remote tracking devices, like other instruments, such as watches and smartphones are often used to keep track of the location of personal items such as keys, wallets and luggage.

Although often not designed for this purpose, tracking devices are sometimes used by parents and carers to track their child's location.

- AirTags are small, button-shaped electronic devices, made by Apple. Users connect the device to their Apple ID (account) and place it on or in something they want to keep track of, such as their keys, a bag or a wallet. The location of that AirTag can then be tracked on any device using that ID. Apple says the devices are not intended to be used to track people (see the [company's statement](#)).
- Devices that work in a similar way include:
 - Tile
 - Chipolo ONE Spot
 - eufy SmartTrack Link
- Other devices which track location include additional functions, such as;
 - AngelSense (audio communication)
 - Pebble Mini (audio communication, fall detection)
 - GPS watches and other health wearables (step counters, timers)
 - Smartphones

We understand that location trackers such as AirTags can provide reassurance to parents and carers, particularly those whose children/young people (CYP) travel a long distance to and from school or who are going on a school trip or to an off-site event or how may be at risk of absconding (running off/away).

We know these devices, and their use, present some risks, which we have set out below.

We understand that we need to teach our CYP about the risks and benefits of many forms of technology and work closely with parents/carers when doing this.

There is no need to track your CYP when they are in school or on any external visit as they are always supervised by staff.

The risks these devices present include:

- **Unauthorised tracking:** where a CYP is tracked without their knowledge, or by a person who has no legal access to them. So, while it's **not** illegal for parents/carers to track their children's location with location trackers such as AirTags or GPS watches, these devices may also be tracking others without their permission.
- **Trackers can also indicate the location of anyone travelling with the CYP** who has not consented to be tracked in this way. When an AirTag is in close proximity to an Apple device (e.g. an iPhone) for a period of time, it notifies Apple device owners of its presence even if the AirTag is not connected to those people. Those people can then attempt to locate the AirTag (including by making it emit a noise) and in some cases disable it.
- **It is illegal to track adults without their consent.** Any adult accompanying a CYP on a trip would need to consent to being tracked by an accompanying learner's tracker.
- **Unauthorised access:** the learner's location could be tracked by a parent/carer when they have no legal access to the child, or outside their access hours or arrangements (where there is shared custody)
- **Unwanted or unauthorised contact:** trackers can increase the risk that learners will have unwanted or unauthorised contact with the parents/carers of their peers; for example, on school trips
- **Peer ridicule:** trackers, especially those the learner wasn't aware of carrying, can cause embarrassment and/or trigger bullying
- **Additional functions:** some tracker devices have other functions, such as allowing another person to listen remotely, or communicate both ways with another device, which could lead to a parent/carer listening to the learner and/or people around them without their knowledge or permission and raise data protection and legal concerns. Some trackers come with additional features, such as two-way communication between the device and linked mobile phone numbers. We treat these devices in the same way we would a mobile phone (see our mobile phone policy)

- **Alarms:** some tracking devices make loud noises which can be disruptive and hard to turn off – for example, AirTags make a noise when separated from their connected device for more than 8 to 12 hours
- **Alerts:** getting a notification that a tracker is travelling with them (i.e. being carried by a CYP they are travelling with) on a school trip or outing can worry staff and volunteers; for example, they might fear that they're being stalked by someone
- **Increasing anxiety:** parents and carers may feel anxious if they get 'too many' or 'too few' notifications from the tracker, or if the locations that are logged are not as expected – for example, because planned routes change due to unforeseen circumstances or the tracker is lost or stolen. Staff or learners may also worry about causing this anxiety
- **Damaging trust:** tracking a CYP when in the school's care can cause or worsen relationship issues between parents/carers and staff, learners and volunteers – especially if any (directly or indirectly) tracked people aren't aware the device is being used
- **Increasing anxiety:** disruptions to expected location data – due to unavoidable changes of route or plan (e.g. on a school trip), or to device loss or malfunction – can cause anxiety to both parents/carers and to learners and staff who are aware of potential parent/carer worry
- **Loss or damage:** School cannot take responsible for the loss of damage of any devices sent to school. If we do agree to it, as below, then we should take responsibility

Use of Personal Trackers in Exceptional Agreed Circumstances

In exceptional cases, a CYP may be provided with a personal tracker to support their safety and wellbeing. This measure is only considered following a comprehensive risk assessment and in consultation with parents, carers, and relevant professionals.

Trackers may be deemed necessary when a CYP is at significant risk of absconding, or when their communication and sensory needs limit their ability to remain safe in unfamiliar or unpredictable environments.

The use of such devices forms part of a wider safeguarding strategy and is subject to regular review to ensure it remains proportionate, respectful, and in the best interests of the CYP. In these circumstances, any tracker used must be configured solely for location monitoring; parents and carers must not use the device as a two-way communication tool or listening device while the CYP is in school, to protect privacy and maintain appropriate boundaries.

Promoting independence – we are always looking for ways in which technology and technological developments can support our children/young people's independence, and we will remain mindful and innovative in this area, working in collaboration with parents/carers and families.

We only permit the use of location trackers on school grounds and on school trips or at off-site events when:

- School is aware that they are carrying the device and an agreement as to when/how it is being used is in place
- That it's turned on, what it does, and who has access to the data that it transmits
- The device (if it's a standalone tracking device) is kept in an agreed and secure manner, this would usually be attached to a school bag or coat, which is kept outside the classroom when the CYP is on the school site
- Any live listening or 2-way communication functionality is turned off during school hours and on school trips or at off-site events
- Any noise-making functionality, such as emitting an alarm, is turned off and/or the CYP knows how to turn it off promptly. If a device does cause disruption, they must immediately silence the alarm and/or deactivate the device, or it will be confiscated
- The parent/carer using the device understands that:
 - The device may transmit false information, or cease to transmit information, due to malfunction
 - Their CYP's location may vary from what they expect due to unavoidable changes to circumstances (such as a change of classroom to a different site) or itineraries (such as travel disruption on a school trip)
 - The school is unable to respond to frequent queries or concerns that arise because of tracker data
 - The school is not responsible for keeping the device safe, secure and undamaged.

We will inform all CYP (as appropriate), staff, volunteers and visitors who are on the school site or on school trips or at off-site events if tracking devices are in use.