SPALDING HIGH SCHOOL

ASSISTIVE TECHNOLOGY POLICY

HEADMISTRESS:		**Mrs M K ANDERSON**
SENDCO:		**Mrs V HICKMAN**
LINK GOVERNOR	**(SEND):**	**Mrs D MULLEY**
	(SAFEGUARDING):	**Mr E FRAGALE**
	(HEALTH & SAFETY):	**Mr J SMITH**
DATE AGREED:		**March 2025**
REVIEW FREQUENCY:-		**Biennial**

Executive Summary:

This policy sets out the statutory regulations and government/Local Authority advice regarding the use of assistive technology to support for students with additional needs. As a maintained community school, SHS follows the Lincolnshire County Council agreed practices and regulations along with the statutory regulations laid down in the Children and Families Act 2014.

Related Policies:
Attendance Policy
Medical Needs in School Policy
Teaching and Learning Policy
Examinations Policy

______________________________ ______________________________

Chair of Governors **Date**

______________________________ ______________________________

Headmistress **Date**

Section 1: Introduction

Spalding High School is committed to providing an inclusive and supportive environment for all students, including those with additional needs. Assistive technology (AT) plays a crucial role in helping students overcome barriers to learning, enabling them to achieve their full potential. By providing appropriate tools and resources, we strive to create an inclusive educational environment where all students, regardless of their abilities or challenges, can engage with the curriculum effectively and confidently.

Section 2: Aims

2.1 This policy outlines our approach to identifying students who require the support of Assistive Technology, ensuring they have equal access to learning opportunities and are fully supported in their academic journey.

2.2 The successful implementation of this policy is the responsibility of all members of staff, ensuring a collaborative approach in supporting students with additional needs.

2.3 The School adheres to the principles set out in the following legislation to ensure data protection and confidentiality:

- General Data Protection Regulation (GDPR) (EU) 2016/679
- Data Protection Act 2018
- The Education (Student Information) Regulations 2018
- The Children and Families Act 2014
- The Special Educational Needs and Disability Act 2001
- The SEN Code of Practice 2015
- The Equality Act 2010

2.4 In line with these regulations, the School will:

- Ensure transparency by informing students and parents/carers about the types of data collected, the purpose for its use, and how long it will be retained.
- Obtain explicit consent from students or their parents/carers before recording personal data or using assistive technology that involves data processing.
- Provide secure storage and access protocols to ensure that recordings and other sensitive data are protected against unauthorised access or misuse.

2.5 The School adheres to the requirements of ensuring all actions align with statutory obligations and promote inclusion.

Section 3: Definition

3.1 According to the Department for Education (2021), "Assistive technology refers to any item, piece of equipment, or system used to increase, maintain, or improve the functional capabilities of individuals with disabilities".

Section 4: Use of a Word Processor

4.1 Please refer to the School's Examinations policy.

Section 5: Use of Recording and Assistive Technology for Learning Support

Purpose and Scope

5.1 To support students who require assistive technology, teachers may record key parts of a lesson using **Microsoft Teams** with the **transcript function enabled**. This provision ensures that students who may struggle to take sufficiently detailed notes during lessons can access accurate written transcripts of teacher explanations, modelling, and homework instructions. It is uncommon for entire lessons to be recorded.

Eligibility for Recording Concessions

5.2 There are two categories of students who may be granted permission to access this provision:

- **Students with a Specialist Teacher or Educational Psychologist assessment**, where this recommendation has been made and there is a clear need for this to be trialled in school, as observed by the SENDCo.
- **Students with an EHCP**, where the recommendation for recording lessons is specified as part of their provision, and there is a clear need for this to be trialled in school, as observed by the SENDCo.

5.3 In both cases, before this software is trialled, there must be clear evidence of a Graduated Approach, with other reasonable adjustments being trialled and their impact evaluated. For example, providing photocopied notes.

5.4 Any student wishing to record parts of a lesson should initially speak to the SENDCO, explaining why they wish to make use of this concession. The SENDCO will discuss the request with the relevant staff members and Senior Leadership Team (SLT) before a final decision is made.

Decision to Record

5.5 The decision to record a segment of a lesson will be made by the teacher, in consultation with the SENDCo if necessary. Recordings will only be made when they are beneficial for the student's learning and will not disrupt the lesson. Teachers will determine which parts of the lesson are appropriate for recording. Sensitive or personal discussions will not be recorded, and a teacher may opt out of recording if the content is unsuitable.

Recording Procedure

5.6 All recordings must be made using **Microsoft Teams** on a school device to ensure data security and compliance with GDPR regulations. Recording **must not** be made on personal devices.

5.7 The **transcript function** in Microsoft Teams will be enabled during the recording to generate a text version of the recorded segment.

5.8 Recorded lesson segments and transcripts will be made available to the student through their class team on Microsoft Teams. Access to this class team will be restricted to the student, their teacher, the SENDCo, and the Head of Department.

Data Security and Access

5.9 The recordings will be securely stored on the School's system and will not be shared beyond their intended educational purpose. The transcript will be shared with the student, but the recording itself will not be emailed or otherwise distributed outside of Microsoft Teams.

Student Conduct and Permissions

5.10 Students are not permitted to make their own recordings of lessons. Any breach of this policy, including unauthorised recordings or the sharing of materials, will result in the withdrawal of this provision and may lead to disciplinary action in accordance with the School's Behaviour for Learning Policy and PED Mobile Phone Policy.

Agreement and Consent

5.11 An agreement outlining the conditions of this arrangement (Appendix A) must be signed by the student, parent/carer, and teacher before the provision is implemented. A signed copy will be held by the SENDCo.

Section 6: Use of specific laptop software / phone apps

6.1 There may be occasions when students will need to use specific software in addition to their laptop provision such as, or an app on their phone (that is not a voice recorder). Please refer to 4.1 for eligibility criteria.

6.2 Any student wishing use a specific software or phone app should initially speak to the SENDCO, explaining why they wish to make use of this concession. The SENDCO will discuss the request with the relevant staff members and Senior Leadership Team (SLT) before a final decision is made. Appendix __ will need to be completed.

Section 7: Confidentiality and GDPR Compliance

7.1 Ensuring the confidentiality of data and compliance with the General Data Protection Regulation (GDPR) is critical when using assistive technologies, including recording and software applications. The use of software and tools, such as speech-to-text or recording apps, must be carefully managed to safeguard personal information and maintain trust within the school environment.

Data Protection Impact Assessment (DPIA)

7.2 A Data Protection Impact Assessment (DPIA) is a key requirement under GDPR, especially when introducing new technology that processes personal data. The school is committed to conducting a DPIA before the deployment of any software that involves the collection, recording, or processing of student data. This assessment ensures that the risks to data protection are identified and mitigated, and that any potential breaches are proactively addressed. The DPIA will be reviewed regularly to ensure ongoing compliance and updated if there are any significant changes to the software or how it is used. A DPIA template can be found in Appendix B.

Necessity and Proportionality of the Software

7.3 If the software is deemed essential for supporting a student's learning, the school will ensure that only the necessary data is collected and used for that specific purpose.

Scope of Recording and Control of Data

7.4 The school will implement clear guidelines for students on the limits of what can be recorded during class time. This includes ensuring that recordings are restricted to academic content, and that teachers or support staff supervise the recording process to minimise the risk of irrelevant or private information being captured unintentionally. Students will be trained, by class teachers, to differentiate between relevant and irrelevant information and reminded that any recordings should not include confidential or sensitive material.

Data Control Risks and Sharing of Information

7.5 As part of our GDPR compliance, the school will ensure that any recordings or data generated by assistive technology are securely stored and only accessible by those with a legitimate need to access it, such as the student, their teachers, and relevant support staff. Recordings will not be shared with third parties unless explicit consent has been obtained from the student or their parent/carer, and only in accordance with the school's data protection policies.

7.6 Confidentiality and GDPR compliance are at the forefront of the school's approach when using assistive technologies. We are committed to protecting the privacy and personal data of students by conducting DPIAs, ensuring that software is necessary and proportionate, and putting safeguards in place to control data use and sharing. By adhering to relevant legislation and best practices, we aim to maintain a high-trust environment where the educational needs of students with additional needs are supported, while respecting the privacy and safeguarding the personal information for other students and staff.

Appendix A: Request for permission to use a recording device/ voice-recording app/ app or new software

This form should be used where permission is sought to use software or apps that are not normally permitted. Please retain copies of the form and the policy for reference.

Name of student: ____________________________________

Form: ____________________________________

Name of the software / app: ____________________________________

This student is permitted to use the software/app above, as detailed below.

Student agreement:

1. I have read and understand the Assistive Technology policy.
2. I understand that any recording shall not be shared with a third party either in or outside school. This includes sharing by electronic means such as transmission over the internet or via email.
3. I understand that where possible the teacher will explain in advance if recording will not be appropriate. I also understand that there may be occasions where recording may have to be stopped due to the nature or content of the class discussion taking place.
4. I understand that it is the decision of the class teacher in each lesson, as to what parts of the lesson may be recorded.

Signature of student: __________________________ Date: ________

Parental agreement:

1. I confirm I have read the Assistive Technology policy and I have discussed this with my child.
2. I confirm my child is fully aware of the confidentiality protocols.

Signature of parent: _________________________ Date: _________

When complete, please return this form to the SENDCO.

Permission given Signed: _____________________________ (SENDCO) Date: _______________

SENDCO confirms, by signing this agreement, that they have conducted any required DPIA's and this permission has been approved by the Senior Leadership Team.

Appendix B: Data Protection Impact Assessment (DPIA) for [Software/Technology Name]

Data Protection Impact Assessment (DPIA)

This template is an example of how you can record the DPIA process and results. You can start to fill in details from the beginning of the project, after the screening questions have identified the need for a DPIA. You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

SUBMITTING CONTROLLER DETAILS

Name of controller	
Subject/title of DPO	
Name of controller contact /DPO (delete as appropriate)	

STEP 1: IDENTIFY THE NEED FOR A DPIA

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

STEP 2: DESCRIBE THE PROCESSING

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

STEP 3: CONSULTATION PROCESS

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals’ views – or justify why it’s not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

STEP 4: ASSESS NECESSITY AND PROPORTIONALITY

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

STEP 5: IDENTIFY AND ASSESS RISKS

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	**Likelihood of harm**	**Severity of harm**	**Overall risk**
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

STEP 6: IDENTIFY MEASURES TO REDUCE RISK

<table>
<tr><th colspan="5">Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5</th></tr>
<tr><th>Risk</th><th>Options to reduce or eliminate risk</th><th>Effect on risk</th><th>Residual risk</th><th>Measure approved</th></tr>
<tr><td></td><td></td><td>Eliminated reduced accepted</td><td>Low medium high</td><td>Yes/no</td></tr>
</table>

STEP 7: SIGN OFF AND RECORD OUTCOMES

Item	Name/position/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA