



Association of Community
and Comprehensive Schools

*Cumann na Scoileanna Pobail
agus Cuimsitheacha*

29th August, 2022.

**The Secretary,
Board of Management and
School Principal in
each Community and Comprehensive School.**

Members of the Executive of ACCS.

ACCS/Info Bulletin 18/22.

Re: Advice for Schools regarding Smart Glasses.

The recent development and introduction by Meta (the controlling company of Facebook Ireland) of so-called “Smart Glasses” has rightly caused some concern for the public. Using voice-activated controls, the glasses allow a wearer to record short videos and take photos for posting on social media.

The Data Protection Commissioner is concerned about the means by which those captured in the videos and photos can receive notice they are being recorded.

While it is accepted that many devices including smart phones can record third party individuals, it is generally the case that the camera or the phone is visible as the device by which recording is happening, thereby putting those captured in the recordings on notice.

With the glasses, there is a very small indicator light that comes on when recording is occurring. It has not been demonstrated to the DPC that comprehensive testing in the field was done by Facebook or Ray-Ban (who together developed the glasses) to ensure the indicator LED light is an effective means of giving notice. Accordingly, the DPC called on Facebook Ireland to confirm and demonstrate that the LED indicator light is effective for its purpose and to run an information campaign to alert the public as to how this new consumer product may give rise to less obvious recording of their images.

The information campaign is now live across social, print and television media. It is important that the wearer of the smart glasses who may be recording is aware that they will be the data controller in respect of any recordings, just as they are when they take photographs or recordings of people on their smart phones.

Schools are advised to consider smart glasses wearing in the same way they treat smart phone usage in schools, and if they are to be permitted that they are to be used in compliance with the school Acceptable Usage Policy.

Is mise,
le mór mheas,

John Irwin,
GENERAL SECRETARY.