

provisions, including the creation of this Commission, the regulations governing police use of facial recognition fall far short of what we need.

In particular, the law does not regulate or prohibit the use of facial recognition or other biometric surveillance technology in our schools and other public spaces. This is a critical missing piece. Our schools serve a wide variety of students, and bring together a broad range of people. Public schools, at their best, are one of the few places in the nation where people from all backgrounds, races, economic classes, and beliefs come together for a common purpose. Schools are often a safe harbor in troubled communities, a trusted place where people work together on behalf of our children.

Our schools are places where parents or students who don't feel comfortable with the immigration system and the criminal justice system, do engage with teachers, administrators, counselors, etc. on behalf of their kids, or on behalf of their own education. Installing facial or other biometric recognition software in schools runs counter to that purpose, and could keep parents and students away from the very institutions that can do more than any other to help them. I would also like to point out that you have heard and will hear much about the pernicious biases in all existing facial recognition technologies. They consistently misidentify faces of black and brown people at higher rates, and that is an important flaw. However, even if these systems were perfected so that they showed no bias, there would still be absolutely no place for such systems in schools, where our members work hard to build trust with students and families.

The issue rose to our attention in part because of a series of events a few years ago. Our members working in the summer program for students with disabilities began contacting the union to let us know that they were being asked to sign in using a facial recognition app called Tanda. When I contacted the BPS central office, they didn't know about this program, and to this day, we don't know how it came about. While the district stopped using the photo portion of this app and told us that all photos have been deleted, this incident is indicative of how easy it is for private security or HR companies to sell a technology to a well-intentioned principal or superintendent, who does not have expertise in the tech field. Security and efficiency are ever-present and growing concerns in schools and this legislation would prevent overworked and