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# Information for schools using biometric solutions

## Guidance

CRBCunninghams supply identity management solutions to schools and we would like to offer guidance about the issues you might face.

Biometrics are now the norm in schools. There are estimated to be over 2500 secondary schools using biometrics, more than half of the secondary schools in the UK. In addition, a significant number of primary schools use biometrics. On average 98% of students in each school use these systems and those who choose to opt out can use alternatives such as cards or PIN numbers. These schools have already sought parental permission to use biometrics and have opt outs in place.

Current government legislation requires schools to have written permission from at least one parent allowing their children to use automated biometric solutions.

Parental permission from one parent is needed for each individual child to be able to use any biometric software being implemented. Children (or another parent) can request alternative ways to be identified if they wish.

Our understanding from schools using biometrics is that they will seek to formalise permission gathering by email or signed consent forms. This will be done in the same way that it is done already for numerous other activities where consent is already required. There are templates for notification and consent included in the pack you received with this letter.

Schools should seek permission before using biometrics for all applications being implemented and for those that they may use in future (the list may include cashless catering, library software, access control, print and copy management, electronic registration and network access) to reduce future administration.

### What are the alternatives

Alternatives such as ID cards (Magnetic stripe or proximity) are used in some schools. We are able to offer a fully integrated Card Management solution, so that students can use biometrics or cards across a range of solutions. PIN numbers are also an alternative, however they are not as secure as other methods.

### Is there any additional information the School should tell parents

Biometric data is stored in a secure database within the school, and is covered by the schools data protection policies. The data does not include any fingerprint images, instead the data held is a numeric code called a template. A biometric template is sufficient to recognise someone in a school community, but the amount of data held cannot be used to uniquely identify someone from a much larger population. The data cannot be accessed on any computer other than the school's licenced server. Thus data backups do not contain data that can be used outside the school. The data is of no use to any third party and cannot be used to recreate a fingerprint image.

Information for parents about the biometric system is included in our letter templates.

### Issues related to Identity Management. How broad is the law?

You may be using biometric systems not connected to our platform, such as automated facial recognition and some CCTV systems. Please be aware that there are elements to the law that will impact on nearly all schools, and not just those using traditional biometrics. Schools who use Facebook to keep in touch with students and parents will need permission to use biometrics, as Facebook has facial recognition capabilities built in. Furthermore, there are increasing numbers of software packages, including photo management solutions that have face recognition built in. Schools may not use these without parental permission. Current requirements under the Data Protection Act for parental consent for storing digital photographs of students are still applicable.

### Further reading

The Department for Education have published guidance about the legislation and what is required and we recommend that schools look at this carefully.

http://www.education.gov.uk/aboutdfe/advice/f00218617/biometric-recognition-systems-.