



BIOMETRICS POLICY

Lead Person: Head of English
Governing Body Committee: Asset Management

INTRODUCTION

The reason for this policy is to enable the use of library software that uses fingerprint scanning to speed up book issue and to give students greater security over their user identity. A policy is required because of the data protection issues raised by fingerprint scanning.

The school library database (Heritage Online) stores detailed information about all of the books, CDs, DVDs and videos held in the library. It has the capacity to act as an inventory for the whole school, listing where portable items are kept on site and being able to check them out and back in, issuing reminders and fines when and if appropriate.

Heritage Online also has a database of the names of all students and staff, their Reader Number and PIN, their dates of birth, a history of the items they have borrowed and the content they have searched for. The dates of birth are stored to identify year group and to restrict circulation of some items to specific age ranges. The 4 digit PIN is randomly generated, can be altered, and acts as the students' password when they log-in to their Heritage account online to reserve books online or to add electronic book reviews.

Any personal data that is stored falls under the Data Protection Act. The personal data stored in the Heritage database are names and dates of birth.

Heritage has a module that allows items to be issued by scanning the book and identifying a fingerprint of the student or member of staff borrowing the item (hereafter given as the Reader). Fingerprints are not essential to the application but, unlike library cards, they cannot be lost or left at home.

As personal biometric data (i.e. fingerprints) are sensitive personal data, it is important to have a record of the facts about the system and a policy on its use.

FACTUAL BACKGROUND

The data protection issues surrounding the safeguarding of "high level" biometric data (e.g. fingerprint images) would be significant. The Crypt School would not want to have a system that requires high levels of data protection.

The Heritage system does not store fingerprint images. The scanner sees the fingerprint and "samples" points of what it sees. Based on the pattern of lines and junctions in the samples, the scanner makes a number and sends that to the computer. So the scanner sees fingerprints and

uses them to make Reader Numbers. What the computer receives is a library card number, not a fingerprint. It may be hypothetically possible to make a machine that “reverse engineers” the library card number to re-create the sample points. What would be made would be a schematic representation of patches of a fingerprint, not a full or a detailed fingerprint. No such machine exists.

If it were possible to create a machine that generated a full fingerprint, the risk would be low-likelihood but high-consequence. As it is not even hypothetically possible to generate a full fingerprint, this is a low-likelihood and low-consequence situation.

For the purposes of the Data Protection Act, the Readers (students or staff) are the “data subjects”. It is they who must be informed and consulted about the use of their personal data. There is nothing in the Act that states that until a child has reached a specific age any data protection rights they have should be exercised by their parents/guardians. Furthermore, there is nothing in the Act that requires schools to seek consent from parents/guardians before implementing a fingerprint-based application. However, it is clearly desirable that parents/guardians should be fully informed and that students should discuss the matter with adults before being asked for biometric data. As a school, we would wish students to be conscious of their civil liberties and to make rational and informed decisions about the level of risk when giving biometric data to any agency during their lives.

THE CRYPT SCHOOL – POLICY ON BIOMETRICS

This policy has been prepared with reference to the Information Commissioner’s Office report on Biometrics in Schools V1.1 August 2008.

All students and staff joining the school are to be issued with information about the nature of the fingerprint-based system and what personal data is stored by the system.

- Responsible for providing and updating the information: line manager for the Library – Head of English
- Responsible for informing new students: Office Manager
- Responsible for informing new staff: Assistant Head i/c new staff induction

Regardless of the risk, some students, students’ parents or staff may simply feel uncomfortable about giving fingerprint-based data. In this event, a student or member of staff has the option not to use a fingerprint to create and scan their Reader Number. In the case of a student, this must then be followed up by a letter from a parent or guardian requesting a library card with a barcode. The librarian will keep a stock of standard letters for students to take home in this event.

- Responsible for logging student data: Librarian
- Responsible for issuing letter informing parents/guardians of choice not to use fingerprints: Librarian
- Responsible for issue of library cards on receipt of written request: Librarian

All personal data should only be kept in school for as long as it fulfils its specific purpose. There is no reason to retain the names and dates of birth of students or staff within the Heritage system after they have left the school. The Reader record must be deleted as soon as is practical after the Reader leaves the school, normally at the start of a new academic year.

- Responsible for informing Librarian of non-Y13 leavers: Data Manager
- Responsible for deleting Reader records: Librarian

The personal data stored (names and dates of birth) must be protected from unauthorised access.

This information can only be accessed from the Administrator account, which will only allow one user on one machine at any given time. As with all access to personal data, the username and password for this account should be restricted on a need-to-know basis. Currently, those with a need to know are the Head IT Technician, the Librarian and the line manager for the library (Head of English).

Policy: Approved : Full Governors 4th April, 2011

To be Reviewed: March 2012

Annexes:

A – The Data Protection Principles

B – Letter to new students and staff, informing them of the purpose of scanning their fingerprints

C – Letter to parents/guardians informing them of the purpose of scanning students' fingerprints

Annexe A:

The Data Protection Act 1998 includes eight data protection principles with which data controllers must comply. The first, second, fifth and seventh principles are the most relevant to this issue.

The first principle requires that personal data is processed fairly and lawfully. Fairness requires that schools ensure that pupils are informed about and understand the purpose for which their personal data is being processed.

The second principle requires that personal data is obtained for one or more specified and lawful purposes and not further processed in any manner incompatible with that purpose or those purposes. Children's biometric data should therefore not be used for any purpose not directly related to that for which it was collected.

The fifth principle requires that personal data is not kept for longer than it is needed for its specified purpose. Pupils' biometric data should therefore be destroyed when they have left the school.

The seventh principle requires that the appropriate security is in place to safeguard personal data from unauthorised processing and accidental loss, destruction or damage.

Annexe B:

Dear Reader,

The school library database (*Heritage Online*) stores detailed information about all of the books, ebooks, CDs, DVDs and videos held in the library. You can search this database by going to the school homepage and clicking on "Library". You can search by topic, author, keyword and a range of other ways. You can also reserve books for you collect later, so no one else can take it out first.

To borrow a book, just take it off the shelf and bring it to the Librarian's desk. To keep records of what is borrowed, the Librarian, Mr Aston, will bring up your Reader Number and then scan the book. The computer will then keep a record of who has what book. It will email you a reminder if you forget to bring the book back on time and it will count up any money you owe for being overdue. It is free to borrow books and recordings, but forgetting to bring them back can be expensive!

In order to bring up your Reader Number, some libraries use barcodes on a card. *Heritage Online* is set up so that it can recognise you with a fingerprint reader. It is not essential to use fingerprints to call up the number but, unlike library cards, you can't lose them or leave them at home.

The Heritage system does not store fingerprint images. The scanner sees the fingerprint and "samples" points of what it sees. Based on the pattern of lines and junctions in the samples, the scanner makes a number and sends that to the computer. So the scanner sees fingerprints and uses them to make Reader Numbers. What the computer receives is a library card number, not a fingerprint. It may be hypothetically possible to make a machine that "reverse engineers" the library card number to re-create the sample points. What would be made would be a low-detail sketch of patches of a fingerprint, not a full or a detailed fingerprint. And no such machine exists.

It is important for you to know this, as your fingerprints are sensitive personal information. If it were possible to create a machine that generated a full fingerprint, then there would be sensitive data about you stored in school; it is always sensible to be very careful about who you allow to keep sensitive data. As it is not even hypothetically possible to generate a full fingerprint, this there is little reason to be concerned about using this system. If for any reason you are simply uncomfortable with using a fingerprint scanner, just speak to the Librarian, who can arrange an alternative way to bring up your Reader Number.

As a school, we want staff and students to be aware of their civil liberties and to make rational and informed decisions about the level of risk when giving biometric data to any agency during their lives.

I hope that you will find the library friendly, easy to use and filled with facts you want to know and fiction you can't wait to read.

Mark Bennett
Head of English

Annexe C:

Dear Parent/Guardian,

Your son/daughter has been given the letter attached below for information about the new library and its issue system. The library has been an exciting development in the life of the school. The building itself has won an award, the sixth form students have felt the benefit of a dedicated study area with computer access and the last steps are now being taken to make the library itself fully functional; the 10,000th catalogued item was placed on the shelves this week.

The library is consciously a modern library, with lighting and heating that responds to the ambient light and heat levels. As part of this, the issue system is also noticeably modern, using fingerprint scanning to identify the person borrowing a book.

When the word “fingerprint” is mentioned, it would be understandable for parents/guardians to be interested in the implications of using this data.

For the purposes of the Data Protection Act, the Readers (students or staff) are the “data subjects”. It is they who must be informed and consulted about the use of their personal data. There is nothing in the Act that states that until a child has reached a specific age any data protection rights they have should be exercised by their parents/guardians. Furthermore, there is nothing in the Act that requires schools to seek consent from parents/guardians before implementing a fingerprint-based application. However, it is clearly desirable that parents/guardians should be fully informed and that students should discuss the matter with adults before being asked for biometric data. As a school, we would wish students to be conscious of their civil liberties and to make rational and informed decisions about the level of risk when giving biometric data to any agency during their lives.

The school has a policy on biometrics which has been prepared with reference to the Information Commissioner’s Office report on Biometrics in Schools V1.1 August 2008.

I hope you will be able to take the time to read the letter attached, which your son/daughter has read, so that you can discuss how he/she will take advantage of the library resource. I also hope that you will start seeing library books, CDs, DVDs and videos coming home as well as ebooks and the library catalogue being accessed from your home computer.

Reading is like a muscle – the more you use it, the easier it is to use and the more it helps you. Reading is one of the main tools for learning and it opens doors to worlds outside of daily life. It is a precious skill. We want our library to be not just a place for reading but an inspiration for reading. Please encourage your son/daughter to make regular visits and find their niche in the great variety of books.

If there is any way in which you would like to be involved with the library, through book donations or as a parent volunteer, I would be delighted to hear from you. There have already been a significant number of very generous donations, for which I would like to give thanks on behalf of the schools and the students who will read these books.

With very best wishes

Mark Bennett
Head of English