

Data Protection Tasks for Biometric System Implementation

The following outlines the tasks that schools will need to perform to fulfil data protection requirements with regard to use of biometrics in schools.

1. Familiarise yourself with the Data Protection Commissioner's Guidance Note on "Biometrics in Schools, Colleges and other Educational Institutions" and Perform a Privacy Impact Assessment in advance of installing the biometric system. *See relevant documents provided.*
2. Ensure that Security measures are in place to ensure that:
 - a. Access to the information restricted to authorised staff on a 'need to know' basis in accordance with a defined policy.
 - b. Computer systems should be password protected.
 - c. Information on computer screens or manual files should be hidden from persons who are not authorised to see them.
 - d. A back-up procedure for computer held data, including off-site back-up.
 - e. Ensuring that staff are made aware of the school or college's security measures, and comply with them.
 - f. Careful disposal of documents such as computer printouts, etc.
 - g. The designation of a person with responsibility for security and the periodic review of the security measures and practices in place.
 - h. Adequate overall security of the premises when it is unoccupied.
 - i. Where the processing of personal data is carried out by a data processor on behalf of the school or college, a contract should be in place which imposes equivalent security obligations on the data processor.
3. Notify all Parents\Guardians and Students of the implications of the new system and of the fact that the processing of personal data involved in use of the new system is covered by the provisions of the Data Protection Acts, 1988 & 2003. *See Information Note to Parents\Guardians and Students.*
4. Offer Parents\Guardians and students where relevant an easy and traceable method of opting out or consenting to the supply, retention and use of biometric information for use with the system. *See Information Note to Parents\Guardians and Students.*
5. Ensure adequate storage and retrieval of consent and opt out forms. These must be kept on file for the duration of the student's enrolment at the school.
6. Ensure that students who have not given consent or opted out do not enrol their biometric information.
7. Update the school's overall data protection policy to reflect the use of the new biometric system.