# Biometric Policy

**Protection of Biometric Information of Children in Schools**

This policy explains the legal duties The Pace Centre has if we wish to use biometric information about pupils for the purposes of using automated biometric recognition systems.

**Key Points**

- Schools and colleges that use pupils' biometric data (see 1 below) must treat the data collected with appropriate care and must comply with the data protection principles as set out in the Data Protection Act 1998
- Where the data is used as part of an automated biometric recognition system (see 2 below), schools and colleges must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012
- Schools and colleges must ensure that each parent of a child is notified of the school's intention to use the child's biometric data (see 1 below) as part of an automated biometric recognition system
- The written consent of at least one parent must be obtained before the data is taken from the child and used (i.e. 'processed' – see 3 below). This applies to all pupils in schools and colleges under the age of 18. In no circumstances can a child's biometric data be processed without written consent
- Schools and colleges must not process the biometric data of a pupil (under 18 years of age) where: a) the child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data; b) no parent has consented in writing to the processing; or c) a parent has objected in writing to such processing, even if another parent has given written consent
- Schools and colleges must provide reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system

## What is biometric data?

1) Biometric data means personal information about an individual's physical or behavioural characteristics that can be used to identify that person; this can include their fingerprints, facial shape, retina and iris patterns, and hand measurements.

2) The Information Commissioner considers all biometric information to be personal data as defined by the Data Protection Act 1998; this means that it must be obtained, used and stored in accordance with that Act (see relevant paragraphs below).

3) The Protection of Freedoms Act includes provisions which relate to the use of biometric data in schools and colleges when used as part of an automated biometric recognition system. These provisions are in addition to the requirements of the Data Protection Act 1998. (See relevant section below).

## What does processing data mean?

'Processing' of biometric information includes obtaining, recording or holding the data or carrying out any operation or set of operations on the data including (but not limited to) disclosing it, deleting it, organising it or altering it.

An automated biometric recognition system processes data when:

a. Recording pupils' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
b. Storing pupils' biometric information on a database system;
c. Using that data as part of an electronic process, for example, by comparing it with biometric information stored on a database in order to identify or recognise pupils.

**Biometric Information at Pace**

**Introduction**

Assistive technology is ever more critical to enabling children and young people with complex physical disabilities to reach their full potential and to participate fully in the world.

Pace is aspiring to become a SMART Special School, through which the power of technology will be fully harnessed to further enhance the outcomes that we can achieve for our children, young people and families.

That development will not detract from the outstanding provision that we already deliver.

**Aims of this policy**

To summarise the risks and benefits of the use of devices which feature artificial intelligence such as Smart speakers within Pace as part of the SMART School initiative.

To stipulate measures in place to mitigate risk and maximise the positive impact of these devices on children and young people at Pace, particularly with regard to:

- Preparation for adulthood in a world in which Smart technology is commonplace
- Maximising independence and developing life skills
- Capitalising on the strengths and abilities of Pace's children and young people in terms of independent access and control of their environment

**The SMART School Concept**

The SMART School concept further enhance our practice, making the most of what technology can deliver for our children and young people, and will incorporate:

· **A genuinely SMART curriculum** – that is even more accessible and stimulating than our existing curriculum and which allows our children and young people to record their learning more easily and efficiently;

· **A 'SMART Lab'** – our pilot SMART classroom, allowing us to prototype the technologies and combinations of technologies that will work best and providing a research base for us to work with technology companies, other specialist clinicians, educators and researchers to push back the boundaries of what is possible in a SMART school environment;

· **A Mobile AT Lab** – to enable our AT specialists to take their knowledge and expertise out into the community to help children, young people and their families to make the most of assistive technology in their own homes;

· **SMART classrooms** – providing an AT rich environment in which our students can advance their independence and learn new skills by using AT to leverage their learning at every opportunity, from entering the classroom to leaving school at the end of the day;

· **SMART school infrastructure** – including superfast broadband access, enhanced teaching, assessment and communication equipment and an environment which every student can control (according to their individual ability);

· **SMART ways of working** – leading to a streamlining of processes, procedures and systems, as well as the hardware and software we use, creating a more efficient and cost-effective way of working. This will include a greater use of online assessment tools and 'paper-lite' environment.

**Safeguarding**

Pace is committed to the safeguarding and wellbeing of the children and young people who access Pace services. (See Child Protection Policy.)

Whilst the use of devices with AI functionality such as Smart speakers has become commonplace in many people's homes, they are not intended for use in an educational environment and their features and abilities bring with them many exciting opportunities alongside some significant risks.

As an organisation, Pace is committed to maximising the benefits to our students in terms of how we position and set up Smart devices whilst implementing robust measures to mitigate risks in terms of privacy, content and the safety and wellbeing of our students.

**Security/technical requirements**

- All devices must be GDPR compliant and Pace IT should carry out a review of privacy and security policies from the equipment vendor at least every 6 months

- During the school day the device may be left on but once the pupils have gone home staff should unplug or disable any voice activated devices so that the

minimum amount of personal data is recorded when the device is not directly in use.

- Pace IT should adjust settings to ensure that the minimum amount of personal data is stored or sent outside Pace, and that data is stored for the minimum time possible

- All devices will be installed and updated by Pace IT Services

- Pace staff are responsible for monitoring the use of the devices and to ensure that the devices are used appropriately and will notify Pace IT of any concerns immediately.

- Devices should be used for Educational purposes only and use should be of educational value

**Risk mitigation Measures**

The following steps will be taken in order to mitigate risk, whilst maximising learning opportunities using voice activated devices at Pace. Two particular online articles have been referenced in order to write this guidance which will be reviewed at least annually.

**1. Each voice activated device will be set up with a brand new Amazon account.**
This account will be used only for the Echo device in the classroom. That way, we can other accounts separate, like personal or school accounts, just for purchasing or using Amazon services.

**2. The voice activated device will be kept muted when not in use**
Just as you put away the iPad or Chromebook when not in use, the mute button does the same thing. You can glance over at the device and see if the red ring is lit up to check if it is still in mute.

**3. Lapel Microphones will be available for use by teachers along with an emergency button to turn off all devices.**

**4. Voice recordings will be deleted periodically**
Menu (top left) > Settings > Alexa Account > Alexa Privacy > Review Voice History > select the Date Range (e.g. All History) > Tap "Delete All Recordings"
Alternatively, you can delete by voice, "Alexa, delete everything I said today" or have it deleted automatically every 3- or 18-months.
A balance needs to be kept to allow devices to learn to better understand student voices – this learning is deleted along with the voice recordings.

**5. "Automatic voice recognition" will be turned off**
In the classroom setting, Amazon doesn't need to recognize voices to work well. Open the Alexa app on your smartphone or tablet > Menu (top left) > Settings > Alexa Account > turn off Automatically recognize voices

**6. Turn off "help develop new features"**
Lots of products ask you to opt-in or opt-out of sending samples of data to improve their products. Amazon does the same with Alexa. To turn it off, open the Alexa app on your smartphone or tablet > Menu (top left) > Settings > Alexa Account > Alexa Privacy > Manage how your data improves Alexa > turn off Help Develop New Features and turn off Use Messages to Improve Transcriptions.

**7. Parental consent**
Parents, staff and families will be made aware of the use of a voice activated device such as a smart speaker in the classroom. Information about the benefits and positive impact potential will be shared, along with the risks and details of how these are being mitigated at Pace.

**8. Guidelines and safe usage expectations will be co-created with the children and young people in the class -** When do we use the speaker? What is it used for? Who gets to use it? What is OK to say? A Code of Conduct will be created for use of AI in the classroom to manage students' use and expectations. Consideration will be given to the level of comprehension of younger and pre-formal students.

**9. SMART Curriculum to include teaching students about use of AI** – students to be taught that all forms of technology capture information about them from internet searches to GPS phone tracking to Smart speakers capturing voice recordings. This will enable students and their families to make their own decisions about the risks of using technology. Use of smart devices will be linked into our Teaching and Learning policy.

**10. Safe places will be created in school** where students can talk freely without the fear of AI capturing their conversation. Signage will be put up to indicate that AI is in use in relevant areas.

**11. Staff Training will be devised** to ensure that information about safe use of technology is communicated to relevant staff.

**12. Use of smart devices will be included in our E-Safety Policy.**

**References:**
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https://www.edutopia.org/article/alexa-do-you-belong-classroom

https://www.safety.com/amazon-echo-safety/

https://www.commonsense.org/education/articles/what-teachers-need-to-know-about-using-smart-speakers-in-the-classroom

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| **To be reviewed by:** | **Headteacher** |