

Name: Craig Corrigan

Address:

E-mail: xxxxxxxxxxxxxxxxxxxxxxxxxxxx@xxxxxxxxxxxxxxxx.xxx

If calling please ask for:
Kenny McKaig 01382 434577

Dear Sir/Madam

Freedom of Information Request Reference No. 20211021005

I refer to your request of 21/10/2021

The answers to your questions are as follows:

Subject: Freedom of Information request - biometric Processing in Schools

North Ayrshire Council indicate (<https://www.north-ayrshire.gov.uk/Documents/EducationalServices/facial-recognition-faqs.pdf>) that biometrics have been used in Scottish schools for a number of years.

I therefore request the following information under FOISA:

1. Do you collect any form of biometric data relating to children and if so confirm the type?

Dundee schools do not collect any Biometric data

2. What are the stated purposes?

3. Did you undertake an assessment with regards to privacy and necessity/proportionality?

4. Is your processing based solely upon consent ?

5. Where data processing is undertaken by a third party supplier confirm:

i. Did you undertake an assessment of the security risks?

ii. Is the data stored in house or via a cloud provider?

iii. What arrangements are in place to remove data if consent is withdrawn?

iv. Confirm, if any, how many complaints in relation to data subject information rights have been received?

v. Confirm number of data breaches recorded relating to biometric processing and how many were reported to the ICO.

2-5. Not applicable

Your Right to Appeal

If you are unhappy with this reply you may require the Council to review its actions and decisions in relation to your request.

The requirement for review must:-

- be in writing or other permanent form (please address it to me);
- state your name and give an address for correspondence;
- specify the original request for information and the matter which gives rise to your dissatisfaction; and
- be made within 40 working days of the date of this response, although the Council may, if it considers it appropriate to do so, consider requirements for review after that time has passed.

Your requirement for review will be dealt with by a Senior Officer who will reply to you in writing promptly and in any event within 20 working days. He/she may:-

- confirm my decision with or without modification;
- substitute a different decision for my decision;

and will give you their reasons for so doing. If you are unhappy with the Senior Officers decision you may then appeal to the Scottish Information Commissioner. You must submit your appeal to the Scottish Information Commissioner within six months of receiving the Senior Officers decision. Further details on the Scottish Information Commissioner's appeal procedure can be found using the direct link www.itspublicknowledge.info/Appeal or email xxxxxxxx@xxxxxxxxxxxxxxxxxxxx.xxxx or telephone (01334) 464610 or write to Scottish Information Commissioner, Kinburn Castle, Doubledykes Road, St Andrews, Fife, KY16 9DS.

Yours faithfully

Kenneth McKaig
Legal Manager