



Biometric Policy

I. Purpose

Illinois Heartland Library System (“IHLS”) is a public employer and therefore not covered by any requirement to provide its employees with the information in this policy. However, IHLS at all times desires to be as transparent as possible and to provide all information relevant to our employees’ employment and work atmosphere to our employees which is why this policy has been implemented and provided to each employee.

IHLS has a new timekeeping system which has not been put into use as of August 2020 but may be put fully into use in the future, should we find that the timekeeping system works well with our payroll system. Should IHLS put the new timekeeping system in full use, it may require collection of certain “biometric identifiers” from its employees, limited only to an employee fingerprint. IHLS recognizes the sensitive nature of such biometric identifiers, and the biometric information that is based on an employee’s biometric identifiers and therefore is committed to protecting such information with the same care and diligence that it uses to protect other confidential and sensitive information maintained by IHLS. In an effort to further this commitment, this policy: (i) establishes guidance for the collection, retention, and treatment of biometric information obtained or received by IHLS; and (ii) establishes procedures and guidelines for destroying biometric information.

This policy shall be provided to every IHLS employee and also published on the IHLS website, making it available to the public. This policy is also available separately for any employee who desires a copy from the Human Resources Department at IHLS.

II. Biometric Information Collected and Utilized by IHLS

Biometric data includes both “biometric identifiers” a “biometric information.” “Biometric identifier” means a retina or iris scan, fingerprint, voiceprint, or scans of hand or facial geometry. Biometric identifiers do not include any of the following items: writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color. “Biometric information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier used to identify an individual. Biometric information does not include information derived from items or procedures excluded under the definition of biometric identifiers. As mentioned above, the only biometric information that IHLS will collect/have access to is each employee’s fingerprint.

If the above-mentioned system is put into place, IHLS will collect employee fingerprints, and utilize them in connection with its timekeeping procedures. Specifically, employees may be required to scan their fingerprint when they clock in to work each day to confirm that the employee is actually present on IHLS premises or at an assigned work site at the time that he or she is clocked in. This information will be used to ensure that employees are paid properly for time worked.

III. Collection of Biometric Information

In addition to the general notice provided in this policy, each employee whose biometric data will be collected is provided with specific written notice advising the employee that a biometric identifier will be collected and the purpose of such collection, as well as the length of time the data will be stored and used, and each such employee must, as a condition of employment, sign a release consenting to IHLS's collection of the employee's biometric information.

IV. Retention of Biometric Information

Biometric identifiers collected under this policy, and any biometric information that is based on an employee's biometric identifiers will be retained until such time as the employee's employment with IHLS is terminated, and will be destroyed when the **first** of the following occurs: (a) the initial purpose for collecting or obtaining such identifiers has been satisfied such as the end of an employee's employment, or (b) three (3) years after the end of each employee's employment. All biometric identifiers and biometric information derived from identifiers shall be maintained in secured files to which only Human Resources personnel shall have full access. The security measures used to protect biometric identifiers and biometric information will be at least as rigorous as those measures used to protect other IHLS confidential and sensitive information. No person without authorization (including any person outside the Human Resources Department) will be provided with the passwords and/or other security in place to be able to access fingerprint data.

Nothing in this policy shall be construed to prohibit IHLS from maintaining certain records derived from the use of the employee's biometric identifiers or biometric information (for instance, the employee's time records) for a longer period of time in IHLS's discretion and/or as required by law.

IHLS will not sell, lease, trade, or otherwise disseminate or disclose an employee's biometric identifiers or biometric information unless and until: (1) the employee provides written consent to the disclosure; (2) IHLS is compelled to disclose the biometric information pursuant to a valid warrant or subpoena; or (3) IHLS is required to disclose the information under a federal or state law or municipal ordinance.

By signing below, you acknowledge receipt of a copy of this Policy:

Received: _____ Date: _____
Employee Signature

Printed Name: _____

Approved by Illinois Heartland Library System Board October 27, 2020