

Guide and FAQs

Implementation and Use of Biometric Time and Attendance Recording Devices for School Based Employees

Purpose

This document has been developed to assist school leaders and affected employees with the parameters in which biometric time and attendance recording devices (the device) can be introduced in schools for the purpose of recording the time and attendance of school based support staff.

This document has been developed by Workforce Relations, in consultation with the State Schools, Legal and Administrative Law, Information Technology and Procurement branches of the Department, United Voice, Together Queensland and the Business Service Managers' Association.

Scope

This document relates specifically to the installation and use of the following devices (and supporting software) supplied by the identified providers:

Provider	Biometric Time and Attendance Recording Device
TLM Solutions Pty Ltd - Time & Labour Management Address: 51 St Andrews Dr, Cornubia QLD 4130 Telephone: (07) 3287 6522 Website: http://www.tlmsolutions.com.au/	ZKTeco U300-C Fingerprint Time and Attendance Terminal and supporting software
	ZKTeco iFace302 Multi-Biometric Terminal and supporting software
Time & Access Systems Pty Ltd Address: Sumner Park, QLD Telephone: 1300 665 165 Website: http://www.timeandaccess.com.au/Home	Biometric Handpunch with Genesis SQL Time in Attendance Management Software and Queensland State School Attendance Sheet

Guidelines and FAQs

What is the purpose of the device?

To record the time and attendance and ADO balances of school based support staff in line with Department's obligations under the [Industrial Relations Act 1999](#) concerning time recording.

Please note - no fingerprint, handprint or facial scan is stored on the endorsed device or supporting software. Rather the scan is converted to a one-way mathematical template to identify the user and then the scan is

destroyed. If the facial scan option is selected, an actual photographic image of the user's face will be taken when the user is first enrolled on the device. Whilst this image will be stored on the device, its purpose is simply to be displayed on the device's screen when the user scans on or off so that users can confirm the scan identified them correctly.

What device can schools purchase and from whom?

At this stage, the Department only endorses the use of the devices and providers listed in the scope of this document.

These devices have been subject to an extensive compliance review conducted by the Department.

In order to purchase one of the endorsed devices please refer to the DET SOA 71680 Biometric Time and Attendance Recording Devices User Guide. The SOA outlines all aspects of the arrangement include the ordering process. This can be found on One Portal under DET Services>Purchasing & procurement services>Supply arrangements>, then look under Goods/Services for the relevant arrangement. (DET SOA 71680). The User Guide will provide such information as what you can buy under the arrangement, what vendors are on the arrangement, contact details, and ordering process.

Should a school wish to procure an alternate device or from an alternate supplier please contact Procurement (procurement.ICTcategory@dete.qld.gov.au) and/or Workforce Relations (workforcerelations.humanres@dete.qld.gov.au) prior to purchasing as a compliance assessment may need to be conducted on the device and/or supplier.

Who can use the devices?

The identified devices may only be used for time and attendance recording for school based support employees (e.g. Teacher Aides, Cleaners, Administrative Officers etc.).

How should the school consult with relevant employees if they are considering purchasing and installing a device?

Prior to purchasing and installing one of the devices, it's important that the consultation provisions contained within the certified agreements applying to the relevant employees are adhered to. These include the certified agreements applying to:

- Teacher Aides (e.g. the [Department of Education and Training Teacher Aides' Certified Agreement 2011](#));
- Cleaners (e.g. the [Department of Education and Training \(Education\) Cleaners' Certified Agreement 2011](#)); and
- other school based support employees (e.g. the [State Government Departments Certified Agreement 2009](#)).

These consultation provisions are designed to allow the affected employees and their representatives to have meaningful input into proposals raised by school management.

Whilst schools should refer to the applicable certified agreements for detailed information in relation to how consultation should take place, generally there are two stages to the consultative process:

1. Local Consultative Committees (LCC); and

2. Consultation with the affected employees.

LCC's are designed to allow management representatives and union nominees to discuss and refine proposed workplace initiatives as well as address any related issues. Usually, LCCs are limited to 8 individuals with equal union/management representation. There are a range of LCC provisions contained within the aforementioned certified agreements applying to school based support staff. Schools considering purchasing an identified device should refer to the relevant LCC provisions contained within the certified agreements applying to the relevant employees.

During the consultation process, it is important staff and their representatives are advised as to:

- why the introduction of the device is being proposed;
- how the device works (including what is required from employees in order to support the operation of the device); and
- what will occur if an employee does not want to use the device.

It is important that this stage of the consultative process is more than a mere exchange of information. For consultation to be effective the relevant employees must be given reasonable and genuine opportunities to contribute to the decision-making process.

Please refer to the applicable certified agreements for detailed information in relation to how consultation should take place. If you have any questions please don't hesitate to contact Workforce Relations at workforcerelations.humares@dete.qld.gov.au or your representative union.

Schools considering purchasing a device are also encourage to discuss the practicalities and effectiveness of the devices with other schools who have already installed such a device. A demonstration of the device in use can greatly assist during both stages of consultation.

Can a school make all school based support employees use the device to capture their time and attendance and ADO entitlements details?

No. Whilst use of the devices have evident time saving benefits for both school based support employees and school management, the Department does not support their implementation on a mandatory basis. This is because the purpose of the devices (i.e. to capture the time and attendance and ADO data of school based support employees) can be achieved via a number of different means (e.g. the Department's [MS Excel based timesheet](#)). Provided the necessary information is captured so that it meets the recording obligations under the [Industrial Relations Act 1999](#), the means by which that occurs need not be mandatory. The practical effect of this is that if a particular employee reports they are uncomfortable with using a device the employee should be given the opportunity to use alternate scanning mechanisms (e.g. a PIN or proximity card) or revert to using the Department's [MS Excel based timesheet](#) as a means of recording their attendance times.

What prior notification should staff receive from the school regarding the use of their personal information?

In order to set up the device prior to operation, select employee information is required to be collected and used. This will include the employee's name, payroll number, relevant hours of work arrangements and finger, hand or facial scan. In light of the collection and/or use of this personal employee information, **schools using a device and/or proposing to install a device must issue a related privacy notice to affected employees, preferably prior**

to the device becoming operational. The issuing of a privacy notice is designed to inform employees of why and how their personal information is to be used by the school and Department in this instance.

To assist, a Template Privacy Notice has been developed by the Department for customisation and issuing by:

- those schools seeking to introduce one of the identified devices; and
- those schools utilising a device in question without having previously issued a related privacy notice.

The template privacy statement **must be customised by schools** to accurately detail what personal information will be collected by the device, how the information will be used and to whom the information will be disclosed. If assistance is required in customising the privacy statement, please contact the Legal and Administrative Law Branch (advicerequest.LEGAL@dete.qld.gov.au).

What efforts should the school undertake to ensure the accuracy of the device when being installed?

Schools should test the accuracy of the recordings being captured from the device by implementing it initially on a trial basis. Schools are encouraged to concurrently operate the device as well as the Department's [MS Excel based timesheet](#) for a period until schools are comfortable with the accuracy of the device. Operating these time recording systems in parallel for at least 2 fortnights is recommended.

What should schools do to appropriately store and secure employee related personal information used to set up the devices?

When a school elects to install and use one of the identified devices, the Department requires that the school secures employees' personal information through the following means:

- Access to the collected personal information of employees, which is used to operationalise the device and supporting software, should be limited to the employee themselves (who can request to access and review that information at any time) and appropriate school-based administrator(s) (i.e. the school's Business Service Manager, Orange Card Holder and if considered necessary, an additional administrative officer, the Principal or Deputy Principal). To support the secure storage of employees' personal information, the number of school-based administrator(s) should be limited.
- Access by school-based administrators to employees' collected personal information should be strictly for the purposes of:
 - maintaining the currency of that information as it relates to the device and supporting software in question;
 - auditing and adjusting employee recordings (e.g. to capture unplanned absences and/or agreed variations to employees' time recordings);
 - printing employees' time and attendance records at the end of each fortnight for review and verification by the employee and appropriate authorised officer (typically the Business Service Manager); and
 - reviewing and verifying the printed time and attendance records with the respective employees.
- The printed and verified employee timesheets should be safely secured in a dedicated filing cabinet which is to be locked when not in use.

- All related hardware or supporting software which underpins the device must be stored on a school computer connected to the Department’s network and with a separate VLAN with non-routable rules in place. It is also important schools are aware that the Department does not and will not guarantee uptime of the system and will not provide additional support should the system go offline. If you require technical support with respect to the above requirements please log a request with the Department of Education and Training’s Service Centre Online (<https://qlddet.service-now.com/sco/>) for assistance
- Enabling an administrator lock on the device and supporting software so that only an administrator(s) can see any information held on the device and the supporting software is recommended to prevent unauthorised access.
- No personal information of employees should be passed on to an entity outside of Australia. Employees’ personal information stored on the device and supporting software may be viewed by employees of the device provider but only for the express purpose of operationalising or maintaining the device and supporting software. Information will not be sold by the providers nor passed to an entity outside of Australia and is protected by contractual arrangements entered into by the Department and device providers.

How do I set up the device?

The identified providers are able to assist schools with setting up and operationalising the device and the supporting software. Typically this involves the nominated school-based administrators supplying the provider with the necessary personal information of those employees who are to use the device to enable the provider to initially configure the device and supporting software. The nominated school-based administrators are responsible for the ongoing management of the device and supporting software. The following requirements that schools and employees should be aware of are:

- **Legislation requirements under the *Industrial Relations Act 1999***

In order to meet the Department’s time recording obligations under the [Industrial Relations Act 1999](#), the time and attendance reports produced by the device and supporting software need to capture:

- the number of hours worked by the employee during each day and week;
- the times at which the employee started and stopped work; and
- details of work breaks including meal breaks.

These arrangements don’t preclude the application of reasonableness. It is recommended that schools, when setting up the devices, afford employees a reasonable grace period to scan in and scan out. A 7 minute grace period, akin to the Department’s [MS Excel based timesheet](#), would appear to be reasonable. However, the specific grace period may need to be customised by schools and for select employees depending upon the physical size of the school grounds and the degree to which affected employees are dispersed across the school grounds.

- **ADO Hours**

Ensuring that the devices and underpinning software can distinguish between an employee’s ordinary hours and ADO hours is fundamental when setting up the device: that needs to be undertaken by school-based administrators prior to a device becoming operational. To do this, employees need to be assigned “shifts” based on their ordinary hours of work. Any additional hours worked outside of those ordinary

hours and in accordance with the individual employee's ADO Agreement (or through exceptions if applicable) will be classified as accrued time.

- **ADO Agreement**

All school based support employees are required by their respective industrial instrument(s) to have an ADO Agreement in place, consistent with the terms of their applicable industrial instrument(s). When setting up the device for operation, the Department supports any required preprogramming relating to an individual employee's daily ADO hours (consistent with their ADO Agreement). Should approved variations to pre-programmed hours be required (e.g. the actual ADO accrued on a particular day is greater or less than the pre-programmed amount), it's important that the school based administrators promptly make the necessary adjustments to the device recording to reflect the actual ADO hours worked. This may also require adjustments to the individual employee's ADO agreement.

If operationally that practice proves too difficult for schools to administer, the Department is supportive of devices being set up so an individual employee's daily ADO hours are not preprogramming but captured on an accrual basis. Should schools elect to adopt this approach, school-based administrators and the relevant employee will need to compare the accrued ADO hours against the employee's ADO Agreement when reviewing and verifying the printed timesheet at the end of each fortnightly period. This practice may similarly require the employee's supervisor to progressively adjust the individual employee's ADO agreement.

Irrespective of the set up method, the ADO Agreement itself still needs to be established between the individual employee and the school and progressively reviewed as part of time recording verification process.

- **Meal Breaks**

When setting up the device for operation, **the Department supports the use of a pre-programmed 30 minute meal break being deducted from the daily working hours of employees provided that the specific commencement and cessation times of any pre-programmed meal breaks are recorded, are visible on the resulting timesheet and are customisable should adjustments need to be made.** Should approved variations to pre-programmed meal breaks be required (e.g. the actual start and stop time for the meal break on a particular day is greater or less than the pre-programmed break), it's important that the school based administrators promptly make the necessary adjustments to the device recording to reflect the actual commencement and cessation times of any meal break.

In the event it is not possible for administrators to adjust the specific commencement and cessation times of any pre-programmed meal breaks or pre-programmed meal break recordings are not able to be visible on the resulting timesheet, it will be necessary for users to scan on and scan off when taking their actual meal breaks.

This may create an inconvenience for school employees subject to the use of the device as it requires employees to physically present at the device to record their actual commencing and ceasing times of any meal break. This inconvenience can in part be overcome by:

- schools installing a number of devices throughout the school grounds which are all linked to the same supporting software. This would enable school staff to present to the closest device in order to record the actual commencing and ceasing times of any meal break; and

- schools configuring the devices such that it affords employees a reasonable grace period, as noted above, in order to scan in and scan out to record the start and stop time of their meal break.

- **Variations for pre-programmed recordings**

Any variations to pre-programmed recordings made by system administrators to reflect reality (e.g. the taking of special leave), must be accompanied by a comment, recorded in the supporting software, to reflect the reasons for the variation (e.g. for bereavement purposes).

How should employees' planned and unplanned absences be captured on the system?

Absences should be captured by the school-based administrators through assigning the relevant leave type to the employee's time record, after the employee has advised which form of leave they are seeking to access. Leave application forms are still required to be submitted by the employee to validate their absence. Leave applications should be submitted by the employee within a reasonable timeframe, giving consideration to the employee's circumstances.

The Department encourages school administrators to conduct daily audits of employee recordings in order to promptly capture any planned or unplanned absences and identify and address any anomalies (e.g. employees not scanning on or off correctly).

Outside of unplanned or planned absences, what should occur if an employee fails to scan on or off, or the device is not effectively capturing their attempts to scan on or off?

If anomalies such as these are identified the system administrator should alert the effected employee's supervisor who in turn should discuss the matter with the employee as soon as reasonably possible with the express purpose of trying to identify when the employee commenced or ceased duty.

Similarly if an employee, for example, knows that they will be performing duties off campus in an afternoon and, once those tasks are completed, intends to cease their duties and go directly home without returning to scan off, the employee should email or converse with their supervisor, either before the employee departs or on the next working day, regarding the employee's actual cessation time.

The school-based administrator(s) can subsequently make any of the agreed adjustments to the employee commencement or cessation time using their administrator access.

Parties are encouraged to adopt a reasonable and common sense approach to addressing any anomalies.

What happens if there is a dispute about the recorded data?

Should there be any disputes in relation to an employee's recorded attendance times:

- discussions should occur between the employee and their supervisor in a reasonable time; and
- the school-based administrator(s) can make the agreed adjustments using their administrator access, as needed.

If after discussions the dispute remains, schools and the employee should consult the applicable industrial instruments and follow the relevant dispute resolution procedure.

Parties are encouraged to converse and adopt a reasonable and common sense approach to addressing any issues. Daily audits of employee recordings, conducted by the school-based administrators, can assist with the early detection and resolution of identified anomalies.

If you have any questions please don't hesitate to contact Workforce Relations at workforcerelations.humanres@dete.qld.gov.au or your union representative. .

Who undertakes the maintenance and/or provides technical support?

School-based administrator(s) are predominately responsible for undertaking maintenance of the devices and/or supporting software. For that reason, it is recommended one of the administrators be a school-based ICT Officer who holds an orange card.

For updates to the supporting software which underpin the devices, which will be provided by the device supplier as new features are created, school-based ICT Officers should be able to assist with uploading the updates and providing technical support as necessary.

It's reiterated that employees personal information stored on the device and supporting software may be viewed by employees of the device provider but only expressly for the purposes of operationalising or maintaining the device and supporting software. That information will not be on sold by the providers nor passed to an entity outside of Australia and is protected by contractual arrangements entered into by the Department and device providers.