



ALSOP HIGH SCHOOL

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## Biometric Policy

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# ***Biometric Information Policy***

## **Key Points**

Schools that use students' 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 General Data Protection Regulation 2018.

Where the data is to be used as part of an automated biometric recognition system (see 2 below), schools must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.

Schools must ensure that the parent/carer of each child is informed of the intention to use the child's biometric data (see 1 below) as part of an automated biometric recognition system.

The written consent of the parent/carer or the child, where the child is deemed to have the capacity to consent (see below), must be obtained before the data is taken from the child and used (i.e. 'processed' – see 3 below). In no circumstances can a child's biometric data be processed without written consent.

Schools must not process the biometric data of a student where:

- a) The child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
- b) A parent or student has not consented in writing to the processing; or
- c) A parent or student has objected in writing to such processing, even if another parent has given written consent.

Schools must provide reasonable alternative means of accessing the services to those students who will not be using an automated biometric recognition system.

## **Biometric Data and Processing**

### **1. What is biometric data?**

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.

The Information Commissioner considers all biometric information to be personal data as defined by the General Data Protection Regulation; this means that it must be obtained, used and stored in accordance with that Regulation.

The Protection of Freedoms Act 2012 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 General Data Protection Regulation.

### **2. What is an automated biometric recognition system?**

An automated biometric recognition system uses technology which measures an individual's physical or behavioural characteristics by using equipment that operates 'automatically' (i.e. electronically). Information from the individual is automatically compared with biometric information stored in the system to see if there is a match in order to recognise or identify the individual.

Biometric recognition systems can use many kinds of physical or behavioural characteristics such as those listed in 1 above.

### 3. 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 students' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
- b. storing students' biometric information on a database system; or
- 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 students.

### 4. Who is able to give consent

The Data Protection Act gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around age 13. For this reason, for most children in a secondary school, it will normally be up to the individual child to decide whether or not to provide biometric data. Where the academy considers that the child does not have the capacity or they are under the age of 13, parents/carers will be asked to provide consent.

Schools and colleges will be required to notify each parent of a child whose biometric information they wish to collect/use. If either parent objects in writing, then the school or college will not be permitted to take or use that child's biometric data.

### 5. Length of consent

The original written consent is valid until such time as it is withdrawn. However, it can be overridden, at any time either parent or the child themselves objects to the processing (subject to the parent's objection being in writing). When the student leaves the academy, their biometric data will be securely removed from the academy's biometric recognition system.

### 6. Alternative to Biometric

The academy cashless catering system allows for an alternative to biometric scanning and any student objecting to the processing of their biometric data will be issued with a PIN code.

# ***Parent's / Child's biometrics data consent form***

## **NOTIFICATION OF INTENTION TO PROCESS PUPILS' BIOMETRIC INFORMATION**

The school wishes to use biometric fingerprint information of your child as part of an automated biometric recognition system. The school has been operating this system successfully for a number of years and your consent, and the consent of your child, would only mean that the current system continues. However, under the Protection of Freedoms Act 2012 (sections 26 to 28), we are required to notify each parent of a child and obtain the written consent of at least one parent before being able to use a child's biometric information for an automated system.

### **Biometric Information and how it will be used:**

Biometric information is information about a person's physical or behavioural characteristics that can be used to identify them (for example, information from their fingerprint).

The information will be used for the purpose of administering school's cashless catering and school's library systems only. The system will take measurements of your child's fingerprint and convert these measurements into a digital signature to be stored on the secure system. An image of your child's fingerprint is not stored. The digital signature taken from your child's fingerprint is what will be used to permit your child to use above mentioned services.

The school cannot use the information for any purpose other than those for which it was originally obtained and made known to the parent/guardian

### **Who do we share the information with:**

The School wishes to share the information with Cashless Catering Systems provider and Library management software provider, who manage our biometric systems currently. This is necessary to ensure that the system is maintained and is as secure as possible.

### **Providing your Consent/Objecting**

In order to be able to use your child's biometric information the written consent of at least one parent is required. However, consent will be withdrawn if the other parent objects in writing to the use of their child's biometric information. Similarly, if your child objects to this, the school cannot collect or use his/her biometric information for inclusion on the automated recognition system. You can also object to the proposed processing of your child's biometric information at a later stage or withdraw any consent you have previously given. This means that, if you give consent but later change your mind, you can withdraw this consent. Please note that any consent, withdrawal of consent or objection from a parent must be in writing.

The school is also happy to answer any questions you or your child may have.

If you give consent to the processing of your child's biometric information, please sign, date and return the attached consent form to the school.

Yours sincerely

C. Wilson  
Headteacher

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**Reply Slip - Please return to the Main School Office.**

I give my consent to the processing of my child's biometric information to use the automated system to access his/her school meal account.

Child's Name	
Form	
Parent's / Child's Signature	
Date	