



CHOSEN HILL SCHOOL

BIOMETRIC PROTOCOL

Committee Assigned: Community and People

Type of Policy: GUIDANCE

Date approved: July 2018

Date reviewed: April 2022

Date for next review: April 2024

SLT Author: DWR

INTRODUCTION

Chosen Hill School operates a number of automated Biometric recognition systems including the canteen and 6th form registration systems. These are based on fingerprint recognition and allow pupils to pay for meals in the canteen and register for lessons in the 6th form. The school will inform parents of any new systems that are introduced before the school uses any biometric registration information with the system.

Biometric data is personal information about an individual's physical or behavioural characteristics that can be used to identify that person; this can include 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 UK General Data Protection Regulation (GDPR). This means that it must be obtained, used and stored in accordance with that Act.

An automated biometric recognition system uses technology which measures an individual's physical or behavioural characteristics by using equipment that operates 'automatically' (ie 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. There are additional requirements to comply with the Protection of Freedoms Act 2012 sections 26 to 28.

REQUIREMENTS

In order to use biometric information, the school will ensure that each parent is notified of the school's intention to use their child's biometric data as part of an automated biometric recognition system. The school will require the written consent from one parent in order to process the information as long as the child or a parent does not object. Pupils will be made aware that they can object and that an alternative option is available to them. A pupil does not have to object in writing, whilst a parent's objection must be written. Consent can be withdrawn in writing at any time by parents.

The UK General Data Protection Regulation (GDPR), requires a 'statement of clear affirmative action'. Consent must be freely given, specific, informed and unambiguous. Consent shall be as easy to withdraw as to give it. Biometric data is a 'special category of personal data' and as such requires explicit consent.

Parent Notification

Parents are notified that the school intends to use biometric information as part of an automated biometric recognition system and written consent is sought as part of our enrolment process. The letter at Appendix A is sent to both parents as part of the enrolment process. No biometric information is processed unless written consent has been received. If a parent wishes to withdraw their consent they can do so by email or letter to the business manager, admin office or headteacher.

Pupil Consent

If a pupil refuses to participate in, or continue to participate in, the processing of their biometric data, the school will not process that data irrespective of any consent given by the pupils' parent(s)/carer(s).

If a parent or child refuses permission, then a PIN number is given to the pupil to enable them to access the school canteen system. The 6th form registration system is used for the purpose of monitoring attendance and updating signing in and out of the school site during the day. If a parent or child does not give permission to use biometric data for this system, each child will be given a pin number to access the system instead.

When a student leaves the school, their biometric data will be removed from the biometric registration systems.

Processing of Personal Data

Under the UK GDPR regulations all personal data must be processed following principles of the act. This means that

- Data will be processed lawfully, fairly and in a transparent manner and collected for specified, explicit and legitimate purposes. The School will always obtain permission before taking any biometric data and notify pupils, staff and parents of the reason it is being used.
- Information will be accurate and kept up to date.
- Biometric data will be stored securely to prevent any unauthorised or unlawful use. Our data is stored securely on the school server for both the canteen and library systems.
- Data is not kept for longer than it is needed. Data for pupils who leave or who parents withdraw their permission is destroyed as soon as they leave or written notification has been received.
- Biometric data will only be used for the purposes for which it has been obtained and will not unlawfully be disclosed to third parties.

ADDITIONAL RESOURCES

DofE guidance re protection of biometric information of children in schools

<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools>

ICO guide to data protection for organisations:

<https://ico.org.uk/for-organisations/guide-to-data-protection/>

ICO guidance on data protection for education establishments:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/right-of-access/education-data/>

Appendix A

Letter to parents requesting consent from parents and providing information on the use of biometrics in Chosen Hill School.

Dear Parent or Guardian,

Biometric Systems

As you may be aware, Chosen Hill School uses voluntary automatic biometric recognition systems. This is used currently with teaching and administration systems such as cashless catering and 6th form registration and may be used for printing, access, lockers, and e-registration systems in the future.

We find this provides the school with a number of very significant benefits including:

- Reduction in administration time and cost
- Reduction in opportunities for bullying as there is nothing that can be stolen for use by another student
- Ease of access to services for students and no lost cards or pins to remember
- Quicker queueing times for lunch

In order to comply with the provisions of the Protection of Freedoms Act 2012 we need written permission from a parent in order for students to use the biometric systems. Please complete the permission slip below or send an email to admin@chosen-hill.gloucs.sch.uk.

The school will continue to offer an opportunity to opt out for those pupils or parents who would prefer to use alternative forms of identification. Please let us know if you wish to opt out.

If you would like more information or the chance to discuss this further, please feel free to contact me.

Yours faithfully,

Mrs D Wardlaw,
Business Manager

IMPORTANT NOTES FOR PARENTS

Background to the use of biometrics in school

Biometric information is information about someone's physical or behavioural characteristics that can be used to identify them. There are many possible biometrics, including for example, a digital photograph, fingerprint, or hand shapes. The school would like to use information from your child's fingerprint for the purpose of providing your child with access to the school canteen payment system and the 6th form registration system. Under the UK General Data Protection Regulations (GDPR) this type of data is special condition data and therefore requires explicit consent for the specified purpose of using the data.

The information will be used as part of an automated biometric recognition system. This system will take measurements of your child's fingerprint and convert these measurements into a template to be stored on the system. An image of your child's fingerprint is NOT stored. The template is what will be used to permit your child to access services. The information is stored in a highly secure database and is only used by the school to confirm who is using a range of services.

Our chosen catering solution with Cunninghams allows us to use a secure database holding biometric data that is stored on the school secure server. Our 6th Form registration system is with a company called Live Register and the biometric data is stored on the school secure server. The data that is held cannot be used by any other agency for any other purpose. Both of these companies comply with UK GDPR regulations.

The school will not use the biometric information for any purpose other than that stated above. The school will store the biometric information collected securely in compliance with the UK GDPR. The school will not share this information with anyone else and will not unlawfully disclose it to any other person.

Current Legislation – The Protection of Freedoms Act 2012

This legislation requires schools to:

- Notify each parent about the use of the biometric systems in the school and explain what applications use biometrics.
- Receive written permission from one parent if the school is to be able to process biometrics for their child. Consent given by one parent will be overridden if the other parent objects in writing or the child objects. You can also object at a later stage or withdraw consent at any time
- Allow children to choose an alternative way of being identified if they wish.

- Children under 18 who do not have permission will not be able to use existing or new biometrics when using services in the school.

If you do not wish your child to use the biometric system or your child chooses to use an alternative form of identification, such as an Identity Card or pin number, we will provide reasonable alternative arrangements that allow them to access these services. Please let us know if you wish to opt out.

Should you agree for your child to use the biometric system, it is important that you return the signed consent form below as soon as possible. Please note that when he/she leaves the school, or if for some other reason he/she ceases to use the biometric system, his/her biometric data will be permanently deleted.

If you would like to discuss this in more detail, please contact the school business manager, Mrs D Wardlaw.

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CONSENT FORM FOR THE USE OF BIOMETRIC INFORMATION IN SCHOOL

Please complete the slip below if you consent for your child to use biometric systems at Chosen Hill School for cashless catering and e-registration systems until he/she leaves the school.

Even if you consent, your child may object or refuse for their biometric information to be taken. This does not need to be in writing and we would appreciate it if you could discuss this with your child and explain to them that they can object to this if they wish.

Once your child ceases to use the biometric recognition system, his/her biometric information will be securely and permanently deleted by the school.

I give consent for Chosen Hill School for the biometrics of my child:

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Year:.....to be used by Chosen Hill School for use as part of recognition systems as described above.

I understand that I can withdraw this consent at any time in writing to the finance office.

Name of Parent:

Signature:

Date:

Please return this form to the Finance Office