

Use of Biometric Data in School

Policy owner (Name):	Alan O'Reilly, School Business Manager
Governing body oversight:	Full Governing Body
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Aim and Scope

1. This document sets out how the Birchwood Community Academy Trust ("the school") uses biometric data. It should be read alongside the school's Data Protection Policy which is available on the school website.
2. The Department for Education's guidance on Protection of Biometric information of children in schools and college has been used as a reference point in developing this document:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692116/Protection_of_Biometric_Information.pdf

Responsibilities

3. The school treats the biometric data of students and staff with appropriate care and must comply with the data protection principles as set out in the Data Protection Act 1998.
4. Biometric data used by school to quickly identify staff and students at dinner times. The school uses an automated biometric recognition system to do this, and in doing so, complies with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.
5. The schools ensures that each parent or carer of a child is notified of the school's intention to use the child's biometric data as part of an automated biometric recognition system.
6. The written consent of at least one parent must be obtained before the data is taken from the child and used (i.e. 'processed'). This applies to all students in school under the age of 18. In no circumstances can a child's biometric data be processed without written consent. The consent form used by school is attached as appendix one.
7. The schools will not collect or process the biometric data of a pupil (under 18 years of age) where:
 - a) the child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data,
 - b) no parent has consented in writing to the processing, or
 - c) a parent has objected in writing to such processing, even if another parent has given written consent.
8. The schools provides reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system. This is done by using a card system.

Use of Biometrics System at Birchwood Community High School

Birchwood Community High School wishes to use information about your child as part of an automated (i.e. electronically-operated) recognition system. This is for the purposes of providing a cashless catering service to learners while in school. The information from your child that we wish to use is referred to as 'biometric information'. 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 that can be used to identify them, for example, information from their fingerprint. The school would like to take and use information from your child's fingerprint and use this information for the purpose of providing your child with access to printing facilities and cashless catering. 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 (i.e. measurements taken from your child's fingerprint) is what will be used to permit your child to access the cashless catering service.

The law places specific requirements on schools when using personal information, such as biometric information, about learners for the purposes of an automated biometric recognition system.

For example:

- The school cannot use the information for any purpose other than those for which it was originally obtained and made known to the parent(s) (i.e. as stated above);
- The school must ensure that the information is stored securely;
- The school must tell you what it intends to do with the information;
- Unless the law allows it, the school cannot disclose personal information to another person or body – you should note that the only person or body that the school wishes to share the information with is our software provider who supplies the school cashless catering service. This is necessary in order to support the system software on the secure database.

Providing your consent/objection

In order to be able to use your child's biometric information, the written consent of at least one parent is required. However, consent given by one parent will be overridden 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 or 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 and addressed to Alan O'Reilly, School Business Manager.

Even if you have consented, your child can object or refuse at any time to their biometric information being taken/used. His/her objection does not need to be in writing. 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.

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

If you do not wish your child's biometric information to be processed by the school, or your child objects to such processing, the law says that we must provide reasonable alternative

arrangements for children who are not going to use the automated system to access our cashless cafeteria.

Please note that when your child leaves the school, or if for some other reason he or she ceases to use the biometric system, his or her biometric data will be securely deleted.

Please complete and return the consent/objection form below.

Biometric Consent/Objection Form

As explained above, we require consent to take measurements of your child's fingerprint and convert these measurements into a template which is securely stored on the system. **We do not store an image of your child's fingerprint.**

Learner's name		Form	
I give permission for measurements of my child's fingerprint to be taken and used for the school catering service.		Yes <input type="checkbox"/>	No <input type="checkbox"/>
I understand that I can withdraw this consent at any time.		Yes <input type="checkbox"/>	No <input type="checkbox"/>
I understand that once my child leaves school, all information will be securely deleted.		Yes <input type="checkbox"/>	No <input type="checkbox"/>
Parent or carer's name			
Signature			
Learner's signature (If aged 13 year or over)			
Date			

If you have any other questions or if you change your mind at any time, you can let us know by emailing contactus@birchwoodhigh.org, calling school on 01925 853500, or just popping in to the school office.

What is biometric data?

9. 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.
10. The Information Commissioner considers all biometric information to be personal data as defined by the Data Protection Act 1998; this means that it must be obtained, used and stored in accordance with that Act (see relevant paragraphs below).
11. The Protection of Freedoms Act 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 Data Protection Act 1998. (See relevant section below).

What is an automated biometric recognition system?

12. 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.
13. Biometric recognition systems can use many kinds of physical or behavioural characteristics such as those listed in section 1 of the 'What is biometric data' section above.

What does processing data mean?

14. '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 pupils' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner,
 - b) storing pupils' 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 pupils.