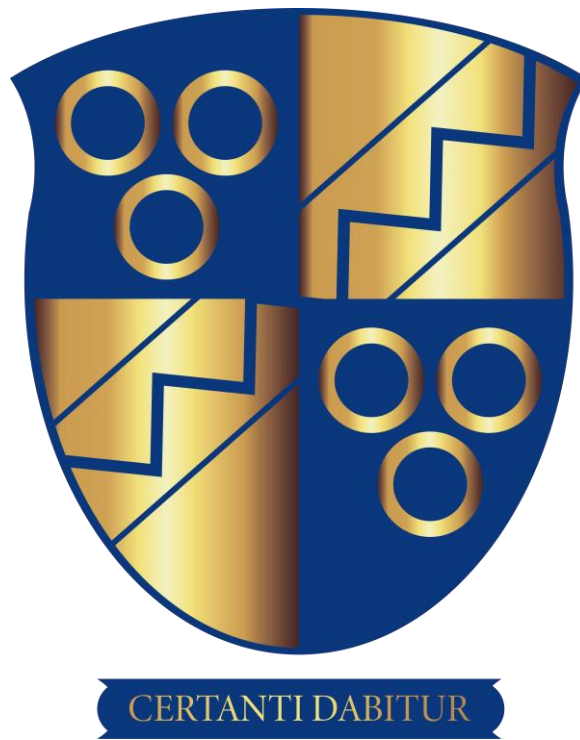


Biometrics Policy

The Oldershaw School



Approved by:

Finance, Audit & Risk Committee

Date: July 2023

Policy owner:

Chief Finance & Operations Officer

Last reviewed:

July 2023

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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.

All biometric data is considered to be special category data under the UK General Data Protection Regulation (UK GDPR). This means the data is more sensitive and requires additional protection as this type of data could create more significant risks to a person's fundamental rights and freedoms.

This policy complies with The Protection of Freedoms Act 2012 (sections 26 to 28), the Data Protection Act 2018 and the UK GDPR.

The school has carried out a data protection impact assessment with a view to evaluating whether use of biometric data is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of biometrics and the contents of this Policy.

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.

3. The legal requirements under UK GDPR

'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.

As biometric data is special category data in order to lawfully process this data, the school must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the school rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained using the providers consent form.

The school process biometric data as an aim to make significant improvements to improve our canteen and lunch facilities. This is to remove the need for cash to be used, remove the need for tokens to be used by students who are entitled to free school meals and to increase the efficiency of service in the school canteen.

4. Consent and Withdrawal of consent

The school will not process biometric information without the relevant consent.

5. Consent for Pupils

When obtaining consent for pupils, both parents/carers will be notified that the school intend to use and process their child's biometric information. The school only require written consent from one parent/carer (in accordance with the Protection of Freedoms Act 2012), provided no parent/carer objects to the processing.

If a parent/carer objects to the processing, then the school will not be permitted to use that child's biometric data and alternatives will be provided.

The child may also object to the processing of their biometric data. If a child objects, the school will not process or continue to process their biometric data, irrespective of whether consent has been provided by the parent/carer.

Where there is an objection, the school will provide reasonable alternatives which will allow the child to access the same facilities that they would have had access to had their biometrics been used.

Pupils and parents/carers can also object at a later stage to the use of their child's/their biometric data. Should a parent/carer wish to withdraw their consent, they can do so by writing to the school at schooladmin@oldershaw.wirral.sch.uk requesting that the school no longer use their child's biometric data.

Pupils who wish for the school to stop using their biometric data do not have to put this in writing but should let their Progress Leader know.

The consent will last for the time period that your child attends the school (unless it is withdrawn).

6. Consent for Staff

The school will seek consent of staff before processing their biometric data. If the staff member objects, the school will not process or continue to process the biometric data and will provide reasonable alternatives. Staff who wish for the school to stop using their biometric data should do so by writing to the Chief Finance & Operations Officer.

The consent will last for the time period that the staff member remains employed by the school (unless it is withdrawn).

7. Retention of Biometric Data

Biometric data will be stored by the school for as long as consent is provided (and not withdrawn).

Once a pupil or staff member leaves, the biometric data will be deleted from the school's system no later than 72 hours.

At the point that consent is withdrawn, the school will take steps to delete their biometric data from the system in no later than 72 hours.

8. Storage of Biometric Data

Biometric data will be kept securely on password protected servers in a locked on site storage facility to prevent any unauthorised or unlawful access/use.

The biometric data is only used for the purposes for which it was obtained and such data will not be unlawfully disclosed to third parties.

9. Monitoring Arrangements

This policy will be reviewed annually and approved by the Trust Board

10. Links to other Policies

- Data Protection policy
- Data Retention policy

11. Appedix 1: Student Biometric Consent Form

12. Appendix 2: Staff Biometric Consent form



The Oldershaw School

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Dear Parent/Carer

Like many secondary schools in the UK, we have moved to an electronic system of payment for school meals and school trips. There are many advantages for parent/carers as well as the school in moving to an electronic system. Overall the main advantage is that there is no need for students to bring cash into the school which can easily get lost. Parents/carers can make payments directly into their child's account using Arbor Parent Portal. Having a cashless system for meals enables us to have a quick and efficient system and students who are eligible for free school meals will no longer need to use tokens. As a parent/ carer you will also benefit by being able to see what your child is eating in school.

The cashless meal system uses the latest biometric (fingerprint) technology. We are required to notify each parent/carers of a child and obtain the written consent of at least one parent/carers before being able to use a child's biometric information (Protection of Freedoms Act 2012: Sections 26 – 28)

Biometric Information and How It Will Be Used

The fingerprint identification system is used in many schools across the UK and in many local schools. It uses the finger to uniquely identify each student (or staff member). This fingerprint is not the same fingerprint that would be taken by a police authority. The system takes measurements of your child's finger and converts these into a number to be stored on the system. An image of your child's fingerprint is **not** stored and so cannot be used by any other system. The law places specific requirements on schools when using personal information, such as biometric information, about pupils for the purposes of an automated biometric recognition system. For example:

- The school cannot use the information for any purpose other than that for which it was originally collected and made known to parents/carers
- 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/body.

Providing your consent/objecting

As stated above, in order to be able to use your child's biometric information, the written consent of at least one parent/carer is required. However, consent given by one parent/carer will be overridden if the other parent/carer 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 their 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/carer must be in writing.

Even if you have consented, your child can object or refuse at any time for their biometric information to be taken or used. Their 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 your child may have. When your child leaves the school, or if they cease to use the biometric system, their biometric data will be securely deleted.

If you do not wish your child's biometric information to be used by the school, or your child objects to such processing, please contact the school to discuss the options.

Consent Form

Please complete, sign and date the enclosed consent form and return it with your completed Admission Pack.

Use of Biometric Data – Consent Form

Please sign and date this form to indicate whether or not you consent to your child's biometric information (as described in the letter attached) being used by the school as part of the biometric recognition system. This consent will remain until your child leaves the school or you subsequently withdraw your consent in writing. Upon leaving the school, the student's biometric information is automatically removed from the system.

Student Name:

- I consent** to my child's biometric information being used by the school in the ways described above
- I do not consent** to my child's biometric information being used and would like to discuss this matter further with the school

Signed: Print Name:.....

(Parent/Carer)

Date:.....

The Oldershaw School

CONSENT FORM – Use of Biometric Data (Staff)

Staff Name:	
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The school uses a cashless catering system in the canteen. The cashless system uses fingerprint technology which removes the need for staff to carry cash and enables more quick and efficient processing at mealtimes. The biometric (fingerprint) identification system uses the finger to uniquely identify you, measuring many aspects of the finger to do this and translating this into a unique identification number. **The system does not store an image of your fingerprint.**

To ensure the school is meeting data protection requirements under UK GDPR we are required to obtain your consent to take and use your fingerprint. If you are not happy for the school to do this, however, then an alternative method will be offered; please speak to the Principal. If you change your mind at any time, you can let the school know by contacting the Chief Finance & Operations Officer in writing.

If you wish to withdraw your consent at any time, or when you leave the school, your biometric data will be securely and permanently deleted within 72 hours.

In signing this form you are authorising the school to use your biometric information for this purpose until you either leave the school or cease to use the system.

Please complete ONE of the sections below:

	I consent to my biometric information being used for the purpose described above.
Print Name:	
Signature:	
Date:	

	I do not consent to my biometric information being used for the purpose described above.
Print Name:	
Signature:	
Date:	

Please return the completed form to the HR & Compliance Manager