



# Draft Biometrics Policy

**Effective From: December 2021**

**Approved by: Directors February 2022**

**Review Date: December 2023**

### **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 more 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.

Biometric data is currently only in use in the Federation at Whitefriars School.

### **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.

### **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 consent form(s) in the attached appendix.

The School process biometric data as an aim to make significant improvements to our dining and lunch facilities. This is to ensure efficiency, to do away with the need for swipe cards and cash being used, which also improves hygiene standards for the staff handling food. It improves safeguarding and security for pupils by removing the need for any pupil to carry cash to school and allows parents and carers to monitor the menu choices being made.

### **Consent and Withdrawal of Consent**

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

#### Consent for Pupils

When obtaining consent for pupils, both parents 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 (in accordance with the Protection of Freedoms Act 2012), provided no parent objects to the processing.

If a parent 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(s).

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 can also object at a later stage to the use of their child's/their biometric data. Should a parent wish to withdraw their consent, they can do so by writing to the School at [office@whitefriars.harrow.sch.uk](mailto:office@whitefriars.harrow.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 class teacher know. This information will be passed to the main school office for records to be amended.

The consent will last for the time period that your child attends the School (unless it is withdrawn).

#### 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 Head of Operations.

The consent will last for the time period that the staff member remains employed by the School (unless it is withdrawn).

### **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 within one calendar month.

At the point that consent is withdrawn, the School will take steps to delete their biometric data from the system within 5 working days.

### **Storage of Biometric Data**

Biometric data will be kept securely and systems will be put in place 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.

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Appendix 1: Biometric Consent form (parent/carer)



**CONSENT FORM**



First name of Student \_\_\_\_\_ Surname \_\_\_\_\_

Name of Parent/Carer (IN BLOCK CAPITALS) \_\_\_\_\_

Please sign the relevant consents below. If you change your mind at any time, you can let us know by emailing [office@Whitefriars.harrow.sch.uk](mailto:office@Whitefriars.harrow.sch.uk) or phoning the school on 020 8427 2080.

**Biometric**

At Whitefriars School we have a cashless catering system. This provides us with an efficient, fast and high quality of service. This system is biometric and it will recognise the fingerprint of your son/daughter at the tills.

As per current legislation we require your consent. This system is simply a method of identifying an individual. The system uses an algorithm-based scan, which reads between 50 and 130 points on the finger/thumb. It is not a fingerprint in any way, shape or form and is of use only in the Cashless System.

Please note, where consent is declined for using the biometric system the school has a duty to provide reasonable alternative arrangements for a student to access a school lunch. I give permission for my child to be recorded for our cashless system.

Signed \_\_\_\_\_ (parent / carer ) Date \_\_\_\_\_

**Please send a copy of this consent form to the Main School Office**

Appendix 2: Biometric Consent form (staff)



## STAFF BIOMETRIC CONSENT FORM



First name \_\_\_\_\_ Surname \_\_\_\_\_

If you change your mind at any time, you can let us know by emailing [office@Whitefriars.harrow.sch.uk](mailto:office@Whitefriars.harrow.sch.uk) or phoning the school on 020 8427 2080.

### Biometric

At Whitefriars School we have a cashless catering system. This provides us with an efficient, fast and high quality of service. This system is biometric and it will recognise a scan of your fingerprint at the tills.

Please note that there is no facility for cash to be taken at the tills.

As per current legislation we require your consent. This system is simply a method of identifying an individual using an algorithm-based scan, which reads between 50 and 130 points on the finger/thumb. It is not a fingerprint in any way, shape or form and is of use only in the cashless system.

Please note, where consent is declined for using the biometric system the school has a duty to provide reasonable alternative arrangements for a member of staff to access a school lunch.

Signed \_\_\_\_\_ (parent / carer )      Date \_\_\_\_\_

**Please send a copy of this consent form to the Main School Office**