

ST BERNARD'S HIGH SCHOOL



Biometrics Policy

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Approved by Premises Committee:
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Chair of Governors

Document Owner and Approval

Facilities Manager is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the Academy's policy review schedule.

A current version of this document is available to all members of staff School's VLE.

Signature:

Date:

Version History Log

Version	Description of Change	Date of Policy Release by Judicium
1	Initial Issue	06.05.18
2	Updated references to UK GDPR	11.05.21
3	Formatting amendments	03.08.22
4	Included information about facial recognition technology and included information on alternatives available.	29.08.24

Biometrics Policy

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. At St Bernard's High School , we use **FINGERPRINT MAPPING AND FACIAL RECOGNITION**.

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 Academy has carried out a Data Protection Impact Assessment with a view to evaluating whether the 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 Academy's use of biometrics and the contents of this policy.

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 Academy must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the Academy 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 for Staff and via Applica Enrolment for New Students

The Academy process biometric data as an aim to make significant improvements to our canteen and lunch. This is to ensure efficiency, to do away with the need for swipe cards and cash being used, to safeguard the children.

Facial recognition technology is likely to result in high data protection risks under UK GDPR. We have carried out a Data Protection Impact Assessment (DPIA) prior to its use. In addition, we have consulted parents and pupils about its use. We have alternatives available if someone prefers to not given their explicit consent for its use, for example [Fingerprint mapping or students giving their name].

Consent and Withdrawal of Consent

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

Consent for pupils

When obtaining consent for pupils, both parents will be notified that the Academy intend to use and process their child's biometric information. The Academy 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 Academy will not be permitted to use that child's biometric data and alternatives will be provided. Students will be able to give their names, which will be manually inputted.

The child may also object to the processing of their biometric data. If a child objects, the Academy 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 Academy 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 Academy at Office@stbernards.southend.sch.uk requesting that the Academy no longer use their child's biometric data.

Pupils who wish for the Academy to stop using their biometric data do not have to put this in writing but should let Mrs K Getty / Facilities Manager know.

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

Consent for staff

The Academy will seek consent of staff before processing their biometric data. If the staff member objects, the Academy will not process or continue to process the biometric data and will provide reasonable alternatives. Staff who wish for the Academy to stop using their biometric data should do so by writing to Mrs K Getty.

Retention of Biometric Data

Biometric data will be stored by the Academy 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 Academy's system no later than 72 hours.

Storage of Biometric Data

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

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.

Appendix 1 – Biometric Consent Form (parent/carer)

Please sign below if you consent to the Academy using Biometrics (fingerprint and/or facial recognition). This biometric information will be used by the Academy for the purpose charging for school meals.

In signing this form, you are authorising the school to use your son/daughter’s biometric information for this purpose until he/she either leaves the school or ceases to use the system.

If you wish to withdraw your consent at any time, this must be done so in writing and sent to Mrs K Getty / Facilities Manager. Once your son/daughter ceases to use the biometric recognition system, his/her biometric information will be securely deleted by the school no later than 72 hours.

Please note that pupils can object or refuse to allow their biometric data to be taken/used and if they do this, we will provide them with an alternative method of accessing relevant services. This will be discussed with you or your child (depending on their age and their understanding of their data rights) within school. However, we would encourage you to also discuss this with your child at home to ensure that they are aware of their right to refuse or to change their mind at any time.

For further information on the processing of biometric data, please see our Biometrics Policy which is available on the school website/in the handbook/from reception.

Parental Consent:

Having read the above guidance information, I give consent/non consent to information from the fingerprint and/or facial recognition of my son/daughter being taken and used by the school for use as part of an automated biometric recognition system.

I understand that I can withdraw this consent at any time.

Consent or Non Consent is given on Applica – enrolment System or via the School Office

Parent/carer name:

Signature:

Date:

Name of student:

Appendix 2 – Biometric Consent Form (staff)

Please sign below if you consent to the school taking and using your fingerprint information as part of an automated biometric recognition system. This biometric information will be used by the school for the purpose to allow them to use for catering.

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.

If you wish to withdraw your consent at any time, this must be done so in writing and sent to Mrs K Getty / Facilities Manager.

For further information on the processing of biometric data, please see our Biometrics Policy which is available [DETAILS - on the school website/in the handbook/from reception].

Staff Consent:

Having read the above guidance information, I give consent to information from my fingerprint being taken and used by the school for use as part of an automated biometric recognition system.

I understand that I can withdraw this consent at any time.

Staff name:

Signature:

Date:

Please return a copy of this consent form to HR