


Biometrics Policy

Ellesmere Port Catholic High School



Approved by:	Mr J Coucill, Chair of Governors 
Lead of Review:	Miss S Oscroft, Strategic Data Manager
Last reviewed on:	August 2024
Next review due by:	August 2025



Dignity of the Human Person

We believe that all pupils are made in the image of God and are therefore inherently dignified. With this policy we are ensuring that every pupil has the chance to achieve their full academic potential with a caring and supportive environment. This policy also ensures that all pupils are treated equally in school and in law and have access to the same high-quality education, no matter their background or ability level.

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.

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 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 School'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 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 via school admission forms or the Arbor Parent App.

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

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 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 admin@epchs.co.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 Pastoral Leader know.

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 Mr C Jones, Strategic Business Manager.

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 no later than 72 hours.

Storage of Biometric Data

At the point that consent is withdrawn, the School 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.



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NOTIFICATION OF INTENTION TO PROCESS PUPILS' BIOMETRIC INFORMATION

Dear Parents/Guardians

Ellesmere Port Catholic 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 using the cashless catering system. 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's physical or behavioural characteristics 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 an individual cashless catering account.

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 services.

You should note that 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:

- a) 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);
- b) the school **must** ensure that the information is stored securely;
- c) the school **must** tell you what it intends to do with the information;
- d) unless the law allows it, the school **cannot** disclose personal information to another person/body – you should note that the only person/body that the school wishes to share the information with is Vericool. This is necessary for the collection and system processing for the cashless catering system.

As part of our assessment into the suitability for employing a biometric recognition system we have conducted a Data Protection Impact Assessment and have consulted with the School's Data Protection Officer.

The school is also happy to answer any questions you or your child may have and any concerns can be referred to the school Data Protection Officer.

Providing your consent/objection

As stated above, 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, the school cannot collect or use their biometric information for inclusion on the automated recognition system regardless of your wishes.

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.

Even if you have consented, your child can object or refuse at any time to their biometric information being taken/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.

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 cashless catering.

If you give consent to the processing of your child's biometric information, please sign, date and return the enclosed consent form to the school. If you do not return the form we will assume you **do not consent**.

Please note that when your child leaves the school, or if for some other reason they cease to use the biometric system, their biometric data will be securely deleted.

Further information about the use of biometric data by the school and any 3rd party system provider can be found in the school privacy notice on our school website.

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WRITTEN CONSENT FORM FOR THE USE OF BIOMETRIC INFORMATION

Please complete this form if you consent to Ellesmere Port Catholic High School taking and using information from your child's fingerprint by Ellesmere Port Catholic High School as part of an automated biometric recognition system. This biometric information will be used by Ellesmere Port Catholic High School for the purpose of cashless catering.

In signing this form, you are authorising the school to use your child's biometric information for this purpose until they either leave 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 the school at the following address: admin@epchs.co.uk

Once your child ceases to use the biometric recognition system, their biometric information will be securely deleted by the school.

Having read guidance provided to me by Ellesmere Port Catholic High School I give consent to information from the fingerprint of my child:

Name: _____ Form: _____

being taken and used by Ellesmere Port Catholic High School for use as part of an automated biometric recognition system for cashless catering.

- I understand that I can withdraw this consent at any time in writing.
- I understand that the school only needs the consent of one parent to allow my child's biometric to be used consent given by one parent will be overridden if the other parent objects in writing to the use of their child's biometric information.
- I also understand that if my child personally objects, the school cannot collect or use their biometric information for inclusion on the automated recognition system regardless of my wishes.

Name of Parent:

Signature: Date:

Please return this form to you Form Tutor