



Biometrics Policy

Coordinator	Helen Edwards
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Staff	Policy folders on staff shared drive
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Students	Website, admissions form

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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 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.

The academy currently uses biometric data for the purpose of cashless catering. As this system was installed and in use before May 2018 a Data Protection Impact Assessment has not been completed. However, if the academy considers any new or future biometric systems, then a Data Protection Impact Assessment would be completed in order to evaluate 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 would inform the academy's use of biometrics and the contents of this policy.

In this policy the word 'parent' is used to cover parents, carers and adults with parental responsibility.

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. At Clapton Girls' Academy we use biometric data for the purpose of cashless catering. This uses a finger ID scan. Students can opt for a non-biometric name card that they can show at the till as an alternative.

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 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 relies on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained on student admission via information gathered on the admission form.

The academy and catering operator process biometric data as an aim to providing the most efficient system of payment for our catering facilities. This is to ensure speed of service, improve security by removing the need for cash and to remove the need for swipe cards as these can be lost or forgotten.



4. Consent and Withdrawal of consent

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

4.1 Consent for students

- When obtaining consent for students, all parents will be notified, wherever possible, that the academy 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 academy will not be permitted to use that child's biometric data and an alternative of a swipe card will be provided.
- 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. In the case of cashless catering, the child will be provided with non-biometric name card that they can show at the till as an alternative
- Students 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 cga@clapton.hackney.sch.uk requesting that the academy no longer use their child's biometric data.
- Students who wish for the academy to stop using their biometric data do not have to put this in writing but should inform their Head of Year who will let the Deputy School Business Manager know.
- The consent will last for the time period that the student attends the academy (unless it is withdrawn).

4.2 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 emailing the Deputy School Business Manager. By requesting a finger ID cashless catering account, it is accepted that staff have provided permission. Staff can request non-biometric name card that they can show at the till as an alternative.
- The consent will last for the time period that the staff member remains employed by the academy (unless it is withdrawn).

5. Retention of Biometric Data

- Biometric data will be stored by the academy and catering operator (currently Chartwells Catering) for as long as consent is provided (and not withdrawn).
- Once a student or staff member leaves, the biometric data will be deleted from the Cunningham's cashless catering system no later than one week after the date of leaving.
- At the point that consent is withdrawn, the academy will take steps to delete their biometric data from the system no later than one week after notification has been received. The Deputy Business Manager will confirm in writing that biometric data has been deleted from the system whenever consent is withdrawn.



6. 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.



Appendix 1: Biometric Consent (parent)

NB this is not a separate form but forms part of our student admission form on JotForm

At Clapton we operate a cashless catering system and will take your child's fingerprint for this purpose once we have parental consent. Our 'normal' settings for the cashless catering system are:

1. Students have a £3.00 daily spend limit.
2. There are no blocks on any food items.

If you would like your child to have any different settings, you must complete the information request below.

Please sign below if you consent to the academy taking and using information from your child's fingerprint as part of an automated biometric recognition system. This biometric information will be used by the academy for the purpose of our cashless catering system. In signing this form, you are authorising the academy to use your child's biometric information for this purpose until they either leave the academy or cease to use the system. If you wish to withdraw your consent at any time, this must be done in writing by emailing cga@clapton.hackney.sch.uk Once your child ceases to use the biometric recognition system, their biometric information will be securely deleted by the academy no later than one week after receipt of the request.

For further information on the processing of biometric data, please see our Biometrics Policy which is available on the academy website.

Parent consent:

Having read the above guidance information, I give consent to information from the fingerprint of my child being taken and used by the academy 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.

If you do not consent, please select the alternative 'name card' option and a card will be issued but please note that this can be a slower method of payment at the tills.

Parent Name:

Signature:

Date:

Name of Student:

If you would like different settings to our normal settings, please inform us here:

Daily spend limit:

Any blocks on food items:



Appendix 2: Biometric Consent (staff)

By requesting the catering team to issue you with a cashless catering finger ID account you are automatically consenting to the academy taking and using your fingerprint information as part of an automated biometric recognition system. This biometric information will be used by the academy for the purpose of our cashless catering system.

In requesting your account, you are authorising the academy to use your biometric information for this purpose until you leave the academy or cease to use the system.

If you wish to withdraw your consent at any time, this must be done in writing by emailing ymonz@clapton.hackney.sch.uk Once you cease to use the biometric recognition system, your biometric information will be securely deleted by the academy no later than one week after receipt of the request.

For further information on the processing of biometric data, please see our Biometrics Policy which is available on the academy website and also in the SharePoint policy folder.

If you do not consent, then an alternative name card will be issued but please note that this can be a slower method of payment at the tills.