

## Protection of biometric information of children in schools and colleges

Schools and colleges using automated biometric recognition systems, or planning to install them, should make arrangements to notify parents and obtain the consent required under the duties set out in the body of this advice. There are no circumstances in which a school or college can lawfully process a pupil's biometric data without having notified each parent of a child and received the necessary consent.

### In processing biometric data, that we have gained consent to do so, we will ensure that:

- We will treat the data collected with appropriate care and will comply with the data protection principles as set out in the Data Protection Act 1998.
- Where the data is used as part of an automated biometric recognition system, we will comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.
- We will ensure that each parent of a child is notified of the school's intention to use the child's biometric data as part of an automated biometric recognition system.
- We will obtain the written consent of at least one parent before the data is taken from the child and used (i.e. 'processed').
- We will not process the biometric data of a pupil (under 18 years of age) where:
  - a) the child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
  - b) no parent has consented in writing to the processing; or
  - c) a parent has objected in writing to such processing, even if another parent has given written consent.
- We will provide a reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system.
- We will communicate to parents:
  - details of biometric information to be taken
  - how it will be used
  - parents' and the pupils right to refuse or withdraw their consent
  - our duty to provide reasonable alternatives for those pupils whose information cannot be processed
  - a pupils objection or refusal overrides any parental consent to processing

- what system is in place to provide reasonable alternative means of accessing services for those pupils who will not be processed
  - communicate how biometric data is processed and stored by the school
- Store biometric data securely to prevent unauthorised or unlawful use
- Not keep biometric data for longer than it is needed
- Ensure that biometric data is used only for the purposes for which they are obtained and that such data are not unlawfully disclosed to third parties

## **Appendix**

### **What is biometric data?**

- 1) 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.
- 2) The Information Commissioner considers all biometric information to be personal data as defined by the Data Protection Act 1998; this means that it must be obtained, used and stored in accordance with that Act (see relevant paragraphs below).
- 3) The Protection of Freedoms Act includes provisions which relate to the use of biometric data in schools and colleges when used as part of an automated biometric recognition system. These provisions are in addition to the requirements of the Data Protection Act 1998. (See relevant section below).

### **What is an automated biometric recognition system?**

- 1) An automated biometric recognition system uses technology which measures an individual's physical or behavioural characteristics<sup>3</sup> 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.
- 2) Biometric recognition systems can use many kinds of physical or behavioural characteristics such as those listed in section 1 of the 'What is biometric data' section above.

### **What does processing data mean?**

'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<sup>4</sup>. An automated biometric recognition system processes data when:

- a. recording pupils' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
- b. storing pupils' biometric information on a database system; or
- c. using that data as part of an electronic process, for example, by comparing it with biometric information stored on a database in order to identify or recognise pupils.

Further information can be obtained from:

<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools>

<http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

Our Lady Queen of Peace  
Biometric Consent Form Nov 2019

Student Name:

Parent Name:

**Consent for use of biometric (fingerprint) information**

Having read the guidance below, I give consent to information from the fingerprint of my child being recorded. I understand that the information will be used by the schools cashless catering system for the purpose of identifying my child at the canteen tills. **Our Lady Queen of Peace will ensure;**

- The information is never shared with another organisation
- Never used for anything other than the cashless catering system
- Is held on a secure server within school
- Can only be accessed by the cashless catering system
- Will be deleted as soon as your child leaves the school
- We be deleted upon request from either parent or child
- A child's request to delete data overrides any parental consent
- We will provide an alternate method of recognition, manual name lookup, for pupils whose biometric data cannot be processed

I understand that I can refuse or withdraw this consent, without detriment, at any time by emailing [gdpr@olqp.lancs.sch.uk](mailto:gdpr@olqp.lancs.sch.uk) or by asking at reception.

Parent/Guardian Signature:

Date:

***Use of biometric information in school***

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. This is the fastest and safest way to identify your child and access any money placed on their account.

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 is what will be used to permit your child to access services.

We will ensure:

- **The information is never shared with another organisation**
- **Never used for anything other than the cashless catering system**
- Is held on a secure server within school until your child leaves
- Can only be accessed by the cashless catering system
- Will be deleted as soon as your child leaves the school
- We will delete the information on your or your child's request
- A child's request to delete data overrides any parental consent
- We will provide an alternate method of recognition, manual name lookup, for pupils whose biometric data cannot be processed

The school is happy to answer any questions you or your child may have. Please phone Reception and ask to speak to Mr Downing. Thank you.

**Please return this form to your child's form tutor**