



HOLY TRINITY

A Catholic and Church of England Voluntary Academy
The Hallam Schools' Partnership Academy Trust

Protection of Biometric Data 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 General Data Protection Regulation (GDPR). This means the data is more sensitive and requires more protection and 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 GDPR.

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 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 using the consent form in the attached appendix].

The school processes biometric data as an aim to make significant improvements to our lunch facilities. This is to ensure efficiency and 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 intends 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 info@holyltrinitybarnsley.org 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 Mrs Oldcorn 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 Mrs Oldcorn.

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.

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.

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.

Policy Review

This Privacy Notice will replace the previous policy and will be reviewed by the Resources Committee of the Governing Body every 2 years.

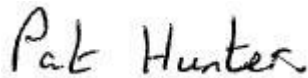
The Privacy Notice was last reviewed and agreed by the Resources Committee of the Governing Body on 2nd July 2020 and is due for review before 2nd July 2022.



2/7/2020

Signature
Head Teacher

Date



2/7/2020

Signature
Chair of Committee

Date

Appendix 1

Biometric Consent Form Cashless Catering for Secondary Phase Students

Dear Parent / Carer

At Holy Trinity we take and use information from the fingerprint in order to operate our cashless catering system.

The cashless catering system enables us to provide an efficient service at break and lunchtimes and ensures that students do not need to carry cash around with them in school.

Your child's account can be topped up via a number of methods:

- By cheque; made payable to 'Holy Trinity' and handed in to the main office. (Please write the full name and form of your child on the back of the cheque).
- In cash at the revaluation stations in the heartspace. (Machines accept the following notes and coins: £20, £10, £5, £2, £1, 50p, 20p, 10p). Please note, the administration office is not able to change money for students. Students place their finger on the scanner to access their account, check their balance and add money. Once they have finished, they press the blue button at the top of the unit.
- Via the Schoolgateway on-line payment system. You will be able to quickly log into a secure account and use your debit or credit card to make a payment into your child's account. The system does not charge for this facility. Further information about on-line payments and how to activate your child's account is available via the parents' link on the school website; www.holytrinitybarnsley.org

The daily 'spend limit' is £4.00.

How are students recognised by the system?

When we have received consent, your child's fingerprint to be registered and will then be translated to an Alpha Numeric code to create the account. The fingerprint image is not stored. When the finger is scanned at the food counter or revaluation stations, the alpha numeric code will identify your child. No fingerprint images are retained or could be extracted from the system.

How is this used to obtain a school meal?

The student places their finger on a scanner at the point of sale. A display will show the server the students name, class and current balance. The cost of the selected food will be deducted from the account and the new balance displayed.

What if my child is entitled to a free school meal?

The free school meal allowance will automatically be added to your child's account every day at around 11.30 am. This can only be spent at lunchtime and is available to spend only on the day it is added. Students can add money for use at breakfast and break times.

Biometric Data and Processing

Biometric Data means personal information about an individual's characteristics. It can be used to identify that person. The data held includes your child's name, class, photo, account balance and meal entitlement.

The Information Commissioner considers all biometric information to be personal data as defined by the General Data Protection Regulation. It must, therefore, be obtained, used and stored in accordance with the regulation.

Consent

We require the consent of parents / carers in order to take your child’s fingerprint until the age of 13. At the age of 13, most children will reach a level of understanding that enables them to have rights over their own data. If you have given your written consent, the consent is valid until such time as it is withdrawn or the child leaves Holy Trinity.

Alternative to Biometric Data

Any student or parent / carer objecting to the processing of their biometric data will be issued with a PIN code.

Biometric Consent Form (Parent / Carer)

I consent to Holy Trinity taking and using my child’s fingerprint as part of an automated biometric recognition system. Their information will be used for the purpose of charging for school meals.

If I wish to withdraw my consent at any time, I understand that this must be done in writing and sent to the Headteacher. When the school receives this written notification, my child’s biometric information will be securely deleted.

Student Name: _____

Parent / Carer Name: _____

Parent / Carer Signature: _____ Date: _____

I **do not** consent to Holy Trinity taking and using my child’s fingerprint as part of an automated biometric recognition system. Their information will be used for the purpose of charging for school meals.

Student Name: _____

Parent / Carer Name: _____

Parent / Carer Signature: _____ Date: _____
