HOE VALLEY SCHOOL
BIOMETRICS POLICY

Person Responsible: GB Committee
Date Adopted: July 2023
Date of last review: Summer 2023
Date of next review: Summer 2024

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.

At Hoe Valley School, with consent we collect biometric data in the form of a scan of a fingertip. The result is the co-ordinates of a collection of features of the fingertip. These features are referred to as minutia; they are points where ridges split in two, end abruptly or are particularly short and typically 25 to 35 minutiae will be detected. The resulting 'map' of these minutiae is converted into a vector of numbers, referred to as the biometric template. The biometric template (not an image of the original fingerprint) is then stored in the biometric database. This is an encrypted number, only useful within the system and cannot be used to recreate an individual's fingerprint image, either by us or by any external system.

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

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.

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 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 through the completion of an HVS online consent form.

The School process biometric data as an aim to make significant improvements to our canteen and lunch facilities. This is to ensure efficiency on the tills and remove any need for cash to be used.

4. CONSENT AND WITHDRAWAL OF CONSENT

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

Consent for students
When obtaining consent for students, parents will be notified that the School 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 School will not be permitted to use that student's biometric data and alternatives will be provided.

The student may also object to the processing of their biometric data. If a student 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 student to access the same facilities that they would have had access to had their biometrics been used.

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 School at info@hoevalleyschool.org requesting that the School no longer use their child's biometric data.

Students who wish for the School to stop using their biometric data do not have to put this in writing but should let the Head Teacher know.

The consent will last for the time period that your child attends the School (unless it is withdrawn).

5.   RETENTION OF BIOMETRIC DATA

Biometric data will be stored by the School for as long as consent is provided (and not withdrawn).

Once a student leaves, the biometric data will be deleted from the School's system no later than 5 school days.

6.   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 5 school days.

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.

The following information is shared with parents as an electronic Google form for completion online.

Hoe Valley School operates a biometric system of paying for food and drinks in our School dining hall.

The advantages of this are that students do not have to remember to bring money in to school on a daily basis and unlike a card, it cannot be forgotten, lost or stolen. It also significantly speeds up the operation of the School food service.

As a parent, you will load up money on to your child's finger using the School's nominated cashless payment provider, ParentPay. This money will be transferred into your child's cashless catering account operated by Live Register.

If your child is eligible for Free School Meals, the School will credit your child's cashless catering account with a daily balance equivalent to the prevailing free school meals daily allowance. You will be able to top-up this balance using your ParentPay account should you wish. Any balance for that day's free meal is automatically wiped at the end of each day and cannot be carried forward.

In order to operate this biometric system, WE NEED YOUR EXPLICIT CONSENT in order to comply with the Data Protection Regulations 2018. In giving consent, you agree for your child's biometrics to be stored and used for the purposes as set out above.

Further information about biometrics, how the data is secured and how the system works has been emailed to you along with the link to this electronic form.

If you do not give your consent to your child's biometrics being used, your child will still be able to use their existing FOB to purchase food and drinks from the Dining Hall. The School is not able to accept any cash payments for goods.

Full details of the way we use and store data relating to your child can be found in the HVS Privacy Notices that are available on our website or from the School Office.

Finally, you should be aware that consent, once given, can be withdrawn at any time by emailing the School office or by writing to the School.

Declaration
(1) I have read and understood this consent form for Live Register.
(2) I understand that I need to give consent for my child's biometrics to be registered and used for the purpose of obtaining food and drink from the HVS School Dining Hall.

I give consent for my child's biometrics being registered
Yes, I agree
No, I do not agree

I understand that any consents given will apply throughout my child's time at the School unless I contact the School to withdraw consent

Name of Parent / Carer
Relationship to Student (eg Mother, Father, Guardian etc)
Date Completed