

Cardinal Langley RC High School

BIOMETRICS POLICY


Document Control

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Document Owner and Approval

The Governing Board of Cardinal Langley RC High School is the owner of this document and is responsible for ensuring that this policy document is reviewed annually in line with the School's policy review schedule. Review, approval and implementation have been delegated to the Governors' Resources Committee.

A current version of this document is available to all members of staff via the staff shared area: T:\School_Management_Documents\Policies Procedures & Guidance and the general public on the school website: www.clrchs.co.uk

Signature of Headteacher:		Date:	20.05.2025
Signature of Chair/Vice-Chair of the Resources Committee		Date:	20.05.2025

Version History Log

Version	Description of Change	Date of Policy Release by Judicium
1	Initial Issue	06.05.18
2	Updated references to UK GDPR	11.05.21
3	Formatting amendments	03.08.22
4	Included information about facial recognition technology and included information on alternatives available.	29.08.24

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 Cardinal Langley RC High School we use facial recognition for the purpose of contactless catering.

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 relies on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Information is given in the School Handbook about the biometrics system used in school, and consent is obtained as part of the enrolment process when children come on roll in Year 7 in September, or as part of an in-year transfer process.

The School processes biometric data as an aim to make significant improvements to our canteen and lunch facilities. This is to ensure efficiency and also hygiene, by doing away with the need for handling cash or a using a PIN pad (contactless catering), thus helping to safeguard all users.

Facial recognition technology is likely to result in high data protection risks under UK GDPR. We have carried out a Data Protection Impact Assessment (DPIA) prior to its use. In addition, we have consulted parents and pupils about its use. We have alternatives available if someone prefers to not given their explicit consent for its use, i.e. a personal identification number (PIN).

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 requires 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, i.e. a personal identification number (PIN).

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/their child's biometric data. Should a parent wish to withdraw their consent, they can do so by writing to the School or emailing admin@clrchs.co.uk requesting that the School no longer uses 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 Form Tutor know, who will in turn inform the IT Manager.

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 the IT 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 as far as possible within 72 hours.

At the point that consent is withdrawn, the School will take steps to delete their biometric data from the system as far as possible within 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.

Appendix 1 – Biometric Consent Form (parent/carers)

The school uses facial recognition software, similar to that used to unlock mobile phones, for the purpose of contactless catering (school meals). Mapped points of a facial image are used, not a full facial image, but we need your consent before we can process any of your child's biometric information in this way.

In signing this form, you are authorising the school to use your child's biometric information for the purpose stated above until they either leave the school or cease to use the system.

If you wish to withdraw your consent at any time, this must be done in writing and sent to admin@clrchs.co.uk. Once your child ceases to use the biometric recognition system, their biometric information will be securely deleted by the school as far as possible within 72 hours.

Please note that pupils can object or refuse to allow their biometric data to be collected/used and if they do this, we will provide them with a PIN code as an alternative method of accessing relevant services.

This can be discussed with you or your child (depending on their age and their understanding of their data rights) within school. However, we would encourage you to also discuss this with your child at home to ensure that they are aware of their right to refuse or to change their mind at any time.

Parental Consent:

Having read the above guidance information, I give consent to my child's biometric data (facial imaging) being collected and used by the school as part of an automated biometric recognition system for the purpose of contactless catering (school meals).

I understand that I can withdraw this consent at any time.

Parent/carers name:

Signature:

Date:

Name of student:

Please return a copy of this consent form by email to admin@clrchs.co.uk or post it to the school address FAO the IT Manager, or hand it in at Reception.