

Pupil Biometric Information Policy

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Tick which category this document refers to:

ISI requirement to be made available	
ISI requirement to be on website	
Website	✓
Internal only	

PUPIL BIOMETRIC INFORMATION POLICY

At Bedales Schools we strive to make the lives of our pupils easier by enabling quick and easy access to a number of school facilities. We also aim to give them greater security over their own user identity when accessing school services.

To this end, as a school, we collect, store and process pupils' biometric data via thumbprint scanning for the purpose of recording day pupil attendance at school.

Bedales Schools takes the collection and storage of all pupil data very seriously, and abides by the principles of The Data Protection Act 1998 and The Protection of Freedoms Act 2012. We store all pupil biometric data securely for the purposes of identification only. Pupil biometric data is only processed for the purposes for which it was obtained, and which have been notified to pupils' parents or legal guardians, and it is not unlawfully disclosed to third parties.

In accordance with The Protection of Freedoms Act 2012, Bedales Schools notifies every pupil's parents and/or legal guardian(s) of its practice of collecting and processing pupils' biometric data as part of an automated biometric recognition system, and obtains written or online parental consent to that use from at least one parent or legal guardian. Parents may withdraw their consent in writing or online at any time. Pupils may also opt out of the use of their own biometric information at any time.

Notification sent to parents and/or legal guardians informs them fully of Bedales Schools' reasons for collecting and processing pupils' biometric data and includes full details of the biometric data to be collected, its intended use, and parents' and pupils' right to opt out of the school's biometric recognition system. Those who opt out will be provided with details of alternative arrangements to access the relevant school services.

The automated recognition software which Bedales Schools uses for the purposes of processing biometric data turns the pupil's thumbprint into a mathematical algorithm. The image of the finger print itself is then deleted meaning that the information which is stored cannot be used to recreate the original image of the thumbprint.

Pupil biometric data will be deleted when the pupil leaves the school, or if for some other reason he/she ceases to use the biometric system.

If parents or pupils have any questions about the school's collection and use of biometric information, they are welcome to contact the Bursar who is the school's nominated data protection officer.

Notification and Consent Form

NOTIFICATION OF INTENTION TO PROCESS PUPILS' BIOMETRIC INFORMATION

Dear Parent/Guardian

The school wishes to use information about your child as part of an automated (i.e. electronically-operated) recognition system. This is for the purposes of recording day pupil attendance at school. The information from your child that we wish to use is referred to as 'biometric information' (see next paragraph). 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.

Biometric information and how it will be used

Biometric information is information about a person's physical or behavioural characteristics that can be used to identify them, for example, information from their thumbprint. The school would like to take and use information from your child's thumbprint and use this information for the purpose of providing your child with registration.

The information will be used as part of an automated biometric recognition system. This system will take measurements of your child's thumbprint and convert these measurements into a template to be stored on the system using a one way encryption which cannot be reversed. An image of your child's thumbprint is not stored. The template (i.e. measurements taken from your child's thumbprint) is what will be used to permit your child to access services.

You should note that the law places specific requirements on schools when using the personal information, such as biometric information, of pupils for the purposes of an automated biometric recognition system.

For example:

- (a) the school cannot use the information for any purpose other than those for which it was originally obtained and made known to the parent(s) (i.e. as stated above);
- (b) the school must ensure that the information is stored securely;
- (c) the school must tell you what it intends to do with the information;
- (d) the school does not disclose personal information to another person/body including the suppliers of the Live Register system who owing to the one-way encryption cannot access the biometric data processed.

Providing your consent/objecting

As stated above, in order to be able to use your child's biometric information, the written consent of at least one parent is required. However, consent given by one parent will be over-riden if the other parent objects in writing to the use of their child's biometric information. Similarly, if your child objects

to this, the school cannot collect or use his/her biometric information for inclusion on the automated recognition system.

You can also object to the proposed processing of your child's biometric information at a later stage or withdraw any consent you have previously given. Please note that any consent, withdrawal of consent or objection from a parent must be in writing.

Even if you have consented, your child can object or refuse at any time to their biometric information being taken/used. His/her objection does not need to be in writing. We would appreciate it if you could discuss this with your son/daughter and explain to them that they can object to this if they wish.

The school is also happy to answer any questions you or your child may have.

If you do not wish your child's biometric information to be processed by the school, or your child objects to such processing, the law says that we must provide reasonable alternative arrangements for children who are not going to use the automated system to record day pupil attendance at school. If you give consent to the processing of your child's biometric information, please sign, date and return the consent form to the school.

Please note that when your child leaves the school, or if for some other reason he/she ceases to use the biometric system, his/her biometric data will be securely deleted.