



THE STONEHENGE SCHOOL

Protection of Biometric Information of Children in Schools Policy 2023

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Approving Authority	GB
Published On School Website	YES

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i. Amendment Record

VERSION	AMENDMENT	DATE
Version 1	Approved by FGB	Apr 2022
Version 1.1	Change of Review date to align with Data Protection Policy & implementation of DPO advice	Mar 2023

The Stonehenge School Biometric Information Policy

1. This policy complies with The Protection of Freedoms Act 2012 (sections 26 to 28), the Data Protection Act 2018 and the UK General Data Protection Regulations (GDPR).

What is Biometric Information?

2. Biometric information is the system used to identify a person based upon an image taken of their fingerprint. The system we use does not store the fingerprint as the image taken is a numeric measurement fed into an algorithm to encrypt the data. The image itself is not stored. The system is one directional meaning that it is impossible to reverse the process to create a fingerprint. The major advantage of this system is that the image created cannot be lost or forgotten unlike a card, pass or log-in.

How do we take the image?

3. We will be using technology provided by CIVICA (formerly Nationwide Retail Systems) to capture the image of your child's finger. Quite simply they place their thumb into the reader. An image is then taken using measurements and encrypted onto the secure database. This database is unique to our school and is not linked to any other external system. Once the data is encrypted your child will be able to access the library and canteen facilities.

What are the advantage of using biometrics?

4. It is expensive for a school to buy swipe cards for library or canteen use that may become lost, defaced or left at home and equally costly for parents or carers that have to pay for replacement cards. By moving to a biometric system we aim to make significant improvements to our canteen and lunch facilities. The queues for obtaining lunch should be quicker and easier to manage since our cashiers will not need to handle notes and change. The system has an in-built automatic allergy alert should your child select items of food they are known to be allergic to. Your child will be able to access their information and level of credit against their record by simply inserting their thumb into a machine. The rare instances of bullying over lunch money will be removed. You will be able to keep a daily track of what your child spends on school lunch knowing that their cash is not being spent in vending machines or outside of school. If your child is in receipt of free school meals then the cashless system removes the distinction between students - your child's account is automatically topped up daily so that they can use the facilities with ease.

Security of the information

5. The use of the biometric system for cashless catering purposes is sometimes confused with the use of biological material and biometric data in a criminal context. The biometric systems used in education do not precisely identify individuals in the general population in the way that police fingerprinting does. The system merely distinguishes between different students well enough to charge the correct ones for their lunch. The data is not shared with any external agencies and is stored on a closed system. An individual's biometric data is almost impossible to replicate making it a secure and reliable means of identification.

6. As a finger/thumb print is unique, it would be next to impossible for someone to steal someone else's biometric fingerprint. Data is not stored on the biometric scanner, so should a scanner be stolen, there is no data to retrieve or miss-use.

7. Further information on the system provided by CIVICA (formerly Nationwide Retail Systems) can be found by clicking [here](#).

What UK law says about biometric information used in schools

8. UK law states that a school cannot use the information for any purpose other than which we have informed you.
9. We have to ensure that the information is stored securely.
10. We have to tell you what we do with the information. We do this through this policy and our Privacy Notice which can be found [here](#).
11. We cannot disclose any of this information with another person/body except for our system supplier CIVICA (formerly Nationwide Retail Systems), we have to share this information with them in order for the system to run.

Permission and withdrawal of consent

12. We only need permission from one parent for us to go ahead and use biometric information for your child. However, if any parent withholds consent (even if one agrees) then we cannot, under law, go ahead. Equally we cannot use the information if your child does not agree to the system. You, and your child have the right, at any time, to withdraw your consent. A parent may withdraw consent in writing however your child may withdraw consent by coming to the school office and informing us of their wish.
13. Once consent is granted the school will continue to use that consent, only for the schemes outlined, until either the child leaves the school, consent is withdrawn or the school ceases to use the systems described. For any of those situations, the data will be deleted. We will not seek consent on an annual basis (unless there is a change to the law), but we will remind you annually that you can change consent at any time.
14. If you do not return the consent form we will automatically take the decision as refusal to consent and your child will not be entered onto the system.

What happens if consent is not granted?

15. We are obliged to offer you alternate means of accessing the systems we propose under this scheme.
16. For the library this will involve a library card or PIN code and for the canteen your child will be issued with a PIN code. Please note that PIN codes do not have the same level of security and it will be your child's responsibility to remember the code and keep it secure at all times.

Which systems will use the information?

17. We can only use this information for the systems we have told you about - our Library system and our cashless canteen system. We cannot and will not use biometric information for anything else without first seeking your consent.
18. We will ask you to use ParentPay to top up your account. From this system you will be able to see how much your child has on their account. If you are new to ParentPay, we will send you instructions closer to the start of the autumn term so that your account can be set up and activated.

Further reading

19. We hope that we have answered all of your questions about the use of biometric data. Should you wish to read further then the following websites offer further guidance and information:

Department for Education's '*Protection of Biometric Information of Children in Schools – Advice for proprietors, governing bodies, head teachers, principals and school staff*':

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692116/Protection_of_Biometric_Information.pdf

ICO guide to data protection for organisations:

http://www.ico.gov.uk/for_organisations/data_protection/the_guide.aspx

ICO guidance on data protection for education establishments:

http://www.ico.gov.uk/for_organisations/sector_guides/education.aspx

20. If you do not have access to the internet, please contact us and we will provide a paper copy of these documents.