

Biometric Data Policy

This is the Biometric Data Policy of the Sutton Grammar School Trust and is published in accordance with the Protection of Freedoms Act 2012 and the Data Protection Act 2018 (DPA) and sets how such data will be used by Sutton Grammar School.

Biometric information

Biometric information is information about a person's physical or behavioural characteristics that can be used to identify them, for example, information from their fingerprint. It is defined in the Data Protection Act as "personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of an individual, which allows or confirms the unique identification of that individual, such as facial images or dactyloscopic data."

How it will be used

Biometric information may be used for a range of applications and services including but not limited to access and exit for the Trust's premises, access to services such as library or paying for meals in the canteen, attendance records and computer services.

Currently the School only uses fingerprint information as part of an automated biometric recognition system. This system takes measurements of a person's fingerprints and converts these measurements into a template to be stored on the system. An image of the fingerprint is not stored. The template (i.e. measurements taken from the fingerprint) is what will be used to permit access to the service.

Consent

Under the DPA the Trust must seek specific consent from a parent, student or a member of staff or a volunteer, including a Trust Member or Director, if it would be beneficial for the Trust, School or the individual to provide such information.

The Protection of Freedoms Act 2012 (sections 26 to 28), places specific requirements on schools and colleges when using personal information, such as biometric information, about students for the purposes of an automated biometric recognition system.

The use of the biometric system is by written consent and if consent is not available the Trust will always ensure there is another means of providing access to the application or service.

A student may object or refuse to participate (or to continue to participate) in activities that involve the processing of their biometric data, and this objection or refusal overrides any parental consent to the processing.

If consent is refused the Trust will ensure that the student's biometric data are not taken/used as part of a biometric recognition system or if taken destroyed following withdrawal of consent.

This Policy should be read in conjunction with the Trust's Data Protection Policy.

Further information and guidance

"Protection of children's biometric information in schools

Guidance for schools, sixth-form colleges, 16 to 19 academies and further education institutions wishing to use automated biometric recognition systems."

<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools>

For use with Year 7 parents

NOTIFICATION OF INTENTION TO PROCESS STUDENTS' BIOMETRIC INFORMATION

Dear [name of parent/carer]

The School wishes to use information about your son as part of an electronically-operated recognition system. This is for the purposes of making purchases in the canteen.

The information from your son that the School wishes to use is referred to as 'biometric information'. Under the Protection of Freedoms Act 2012 (sections 26 to 28), the School is required to notify each parent and obtain the written consent of at least one parent before being able to use your son's biometric information for an automated system. In handling the data the Trust must comply with the Data Protection Act 2018.

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 fingerprint. The School would like to take and use fingerprint information from your son and use this information for the purpose of providing your him with the ability to make purchases from his pre-paid account in the canteen.

The information will be used as part of an automated biometric recognition system. This system will take measurements of your son's fingerprints and convert these measurements into a template to be stored on the system. An image of the fingerprint is not stored. The template (i.e. measurements taking from your son's fingerprint) is what will be used to permit pay for the purchases.

You should note that the law places specific requirements on schools and colleges when using personal information, such as biometric information, about students 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) unless the law allows it, the School cannot disclose personal information to another person/body.

Providing your consent/objecting

As stated above, in order to be able a student's biometric information, the written consent of at least one parent is required. However, consent given by one parent will be overridden if the other parent objects in writing to the use of the student's biometric information. Similarly, if your son/daughter objects to this, the School cannot collect or use the biometric information for inclusion on the automated recognition system.

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You can also object to the proposed processing of your son's biometric information at a later stage or withdraw any consent you have previously given. This means that, if you give consent but later change your mind, you can withdraw this consent. Please note that any consent, withdrawal of consent or objection from a parent must be in writing and addressed to:

Data Protection Officer (bio consent) Sutton Grammar School Manor Lane SUTTON SM1 4AS
or by email to dpo@suttongrammar.sutton.sch.uk with the subject line "withdrawal of bio consent".

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

The School is also happy to answer any questions you or your son may have.

If you do not wish your son's biometric information to be processed by the School, or your son objects to such processing, the law says that the School must provide reasonable alternative arrangements for him to make canteen purchases and the School will do this by providing a swipe card.

If you give consent to the processing of your son's biometric information, please sign, date and return the enclosed consent form to the School.

Please note that when your son leaves the School or if for some other reason withdraws consent to use the biometric system, his biometric data will be securely deleted.

Further information and guidance

"Protection of children's biometric information in schools

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<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools>

Sutton Grammar School Trust

Biometric Data Policy

For use with Year 7 parents

CONSENT FORM FOR THE USE OF BIOMETRIC INFORMATION FOR CANTEEN PURCHASES

Please complete this form if you consent to the School taking and using information from your son's fingerprint as part of an automated biometric recognition system. This biometric information will be used by Sutton Grammar School for the purpose of making purchases from his pre-paid canteen account.

In signing this form, you are authorising the School to use your son's biometric information for this purpose until he either leaves the School or ceases to use the system. If you wish to withdraw your consent at any time, this must be done so in writing and sent to:

Data Controller (bio consent) Sutton Grammar School Manor Lane SUTTON SM1 4AS or by email to dpo@suttongrammar.sutton.sch.uk with the subject line "withdrawal of bio consent".

Once your son ceases to use the biometric recognition system, his biometric information will be securely deleted by the Trust.

Please complete section 1 and sign either section 2 or 3

1 Son's Full Name _____
Form _____

2 Having read guidance provided to me by Sutton Grammar School, I give consent to information from the my son's fingerprint being taken and used by Sutton Grammar School for use as part of an automated biometric recognition system for making purchases from his pre-paid canteen account.

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

Name of Parent/Guardian _____

Signature: _____

Date: _____

3 I would prefer that my son is registered for a swipe card in the canteen. I accept that lost cards will be charged at £5

Name of Parent/Guardian _____

Signature: _____

Date: _____

For use with Year 7 parents

Sutton Grammar School Trust

Biometric Data Policy

Year12 entry

CONSENT FORM FOR THE USE OF BIOMETRIC INFORMATION FOR CANTEEN PURCHASES

Please complete this form if you consent to the School taking and using information from your fingerprint as part of an automated biometric recognition system. This biometric information will be used by Sutton Grammar School for the purpose of making purchases from your pre-paid canteen account.

In signing this form, you are authorising the School to use your biometric information for this purpose until you either leave the School or cease to use the system. If you wish to withdraw your consent at any time, this must be done so in writing and sent to:

Data Controller (bio consent) Sutton Grammar School Manor Lane SUTTON SM1 4AS or by email to dpo@suttongrammar.sutton.sch.uk with the subject line "withdrawal of bio consent".

Once you cease to use the biometric recognition system, your biometric information will be securely deleted by the Trust.

Please complete section 1 and sign either section 2 or 3

1 Full Name _____
Form _____

2 Having read guidance provided to me by Sutton Grammar School, I give consent to information from the my fingerprint being taken and used by Sutton Grammar School for use as part of an automated biometric recognition system for making purchases from a pre-paid canteen account.

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

Name of Student _____

Signature: _____

Date: _____

3 I would prefer to be registered for a swipe card in the canteen. I accept that if I lose the card it will be replaced at a charge of £5.

Name of Student _____

Signature: _____

Date: _____

For use with Year 12 entry