



## **BIOMETRIC INFORMATION POLICY**

### **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. At Tonbridge Grammar School biometric data sourced from the pattern of an individual student fingerprint is used (see Appendix 1).

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.

### **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 rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained using the consent form in the attached appendix.

The School currently uses this system for catering to do away with the need for swipe cards and cash, but we may pilot use for other purposes such as door access, selected year group registration and photocopying.

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### **Biometric Information Policy**

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Review level: Head Teacher

## **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 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 child's biometric data and alternatives will be provided.

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 child's/their biometric data. Should a parent wish to withdraw their consent, they can do so by writing to the School at [office@tgs.kent.sch.uk](mailto:office@tgs.kent.sch.uk) requesting that the School no longer use 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 the Office Manager know.

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 Business 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 leaves, the biometric data will be deleted from the School's system no later than 72 hours.

## **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 72 hours.

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.

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## **APPENDIX 1**

### **Biometric Recognition**

Chartwells provide the school lunch as well as breakfast and break time food and snacks. As the market leader, the company provides catering and support services to over 360 secondary schools throughout the UK. Chartwells are committed to helping develop good eating habits by providing nutritious and tasty food devised by their central team of development chefs and freshly prepared by the onsite catering team.

Chartwells use tills provided by the School. The tills are completely cashless with students' accounts being topped-up via Parentpay. The tills provide information to Parentpay including an itemised account of what has been spent at the canteen, alongside the current balance. The tills also support limit alerts when the balance falls below a certain level and a maximum daily spend. The tills interface with the School Management Information System, offering enhanced features such as the facility to match ingredients listed on the till menus with student intolerances and allergies.

The tills use a student recognition system drawing on biometric data sourced from the pattern of an individual student fingerprint, a technology which is used successfully by thousands of schools including local secondary schools. We currently use this system for catering but we may pilot use for other purposes such as door access, selected year group registration and photocopying.

Parents and students should be assured that this biometric system does **not** store fingerprints. When a finger or thumb is scanned for the first time, the system creates a unique algorithm from the scanned points. This data is then encrypted and serves no purpose other than identification within the School. The encrypted data is securely stored within the School and will not be used for any other purposes. The data will be removed when a student leaves the School or if consent is withdrawn in writing.

### **Biometric Consent**

The School is required to obtain written consent from at least one parent for the processing of this biometric data. We would therefore be grateful if you would **tick the appropriate box on the Registration Form giving your consent for your child to have their biometric data processed and stored in this way and used as outlined above**. Students in receipt of Free School Meals have complete anonymity, however we still need consent.

If you choose **not** to have your child registered, the School will provide an alternative method of identification such as a 4 digit PIN code. The preference of the School is to use biometrics as this is more secure and faster than any other method of identification.

Your consent can be withdrawn at any time by contacting the Office Manager on [office@tgs.kent.sch.uk](mailto:office@tgs.kent.sch.uk)

Further details about the school canteen will be sent in the Induction Pack.

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