

# GLC BIOMETRICS POLICY

## Spring 2024

This Policy was ratified by the Board of Directors on :	Spring 2024
This Policy will be reviewed by the GLC Board on :	Spring 2026

### **GLC Mission Statement**

The GLC's mission is to develop active and thriving citizens within a diverse, truly fair and equal community.

This will be achieved through:

- High quality teaching that deliberately develops competencies of curiosity, creativity, communication and critical-thinking;
- An inspiring and meaningful curriculum;
- The development of productive relationships by instilling the values of compassion, resilience, responsibility and aspiration to prepare our young people for learning and life;
- A commitment to the wellbeing of our staff;
- A culture of professional generosity, collaboration, challenge and support throughout the GLC;
- The development of effective external partnerships for the benefit and wellbeing of our community.

### **Equalities Statement**

The GLC's commitment to equality is enshrined in our mission statement to develop 'active and thriving citizens within a diverse, truly fair and equal community'.

We are a vibrant, innovative and successful organisation: we work hard to be the place of choice to work and to learn. Across the 5 academies of the GLC, we pledge that everyone enjoys an equality of opportunity. We work tirelessly to ensure that individual characteristics including age, ethnicity, socio-economic background, academic ability, disability, gender, religious beliefs, sexual orientation are not discriminated against in any way. We create inclusive environments characterised by mutual respect where difference is celebrated.

# GLC BIOMETRICS Policy Spring 2024 – Spring 2026

## 1. Introduction

Biometric data means personal information about an individual's physical or other characteristics that can be used to identify that person; this can include their fingerprints, facial shape, retina and iris patterns, and hand measurements.

## 2. Operation

The Gateway Academy uses a pupil recognition system using biometrics which is used in the canteen. This has significantly improved efficiency in the canteen as we operate a cashless catering system with benefits including:

- Improved security for handling cash transactions in the school
- Reduction in queuing time
- Pupils will not have to remember to bring cash

Pupils and staff are able to purchase their lunch and snacks by placing their index finger on the Biometric reader.

Payment will then be deducted from their online account. Accounts must be topped up in advance using the ParentPay system and this can be done either online or via one of the Pay Points located in the main building. Pupils who qualify for FSM will need to be signed up to the biometric system in order to continue to receive their lunch.

The Gateway Academy 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, The Gateway Academy 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 parental consent to that use from at least one parent or legal guardian. Parents may withdraw their consent in writing 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 The Gateway Academy 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.

The automated recognition software which The Gateway Academy uses for the purposes of processing biometric data turns the pupil's fingerprint 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 fingerprint.

Pupil biometric data will be deleted when the pupil leaves the school, or if for some other reason they cease 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 school's nominated Data Protection Officer.

## Appendix 1 – Frequently Asked Questions References:

Department for Education's 'Protection of Biometric Information of Children in Schools:

- [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/268649/biometri\\_cs\\_advice\\_revised\\_12\\_12\\_2012.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268649/biometri_cs_advice_revised_12_12_2012.pdf)
- ICO Guide to Data Protection for Organisations:  
[http://www.ico.gov.uk/for\\_organisations/data\\_protection/the\\_guide.aspx](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](http://www.ico.gov.uk/for_organisations/sector_guides/education.aspx)

## **Appendix 2 - How do we use the information?**

The biometric fingerprint information that we are referring to above is used by The Gateway Academy to provide a cashless catering service in the school.

### *The change in the law*

With the change in the law the school is no longer able to use this information from 1st September 2013 without the explicit consent of one or more of the parents of children at the school and for this reason we are required to ask you to provide written explicit consent to our use of the biometric data that we hold for your children.

### *How do I give or deny consent?*

The Gateway Academy has sent a form home that you must complete. If you have not received the form another copy is available upon request.

### *What if I do not wish to give consent to The Gateway Academy use of my child's biometric data?*

If consent is not provided, the school has to provide an alternative way for your child(ren) to use the facilities managed by the biometric data.

In The Gateway Academy case this will be by the provision of "lunch cards" that will have to be swiped through readers instead of using biometric fingerprints.

These cards are automatically assigned by The Gateway Academy when the pupil joins free of charge. In addition to a the initial card there will be a charge for the replacement of a lost or damaged cards. It is expected that these costs will not exceed three pounds (£2.50) every time a card is issued and the funds for this will be recovered automatically through the schools cashless catering system.

### *What information should schools provide to parents/pupils to help them decide whether to object or for parents to give their consent?*

Any objection or consent by a parent must be an informed decision – as should any objection on the part of a child. Schools and colleges should take steps to ensure parents receive full information about the processing of their child's biometric data including a description of the kind of system they plan to use, the nature of the data they process, the purpose of the processing and how the data will be obtained and used. Children should be provided with information in a manner that is appropriate to their age and understanding.

### *What if one parent disagrees with the other?*

Schools and colleges will be required to notify each parent of a child whose biometric information they wish to collect/use. If one parent objects in writing, then the school or college will not be permitted to take or use that child's biometric data.

### *How will the child's right to object work in practice – must they do so in writing?*

A child is not required to object in writing. An older child may be more able to say that they object to the processing of their biometric data. A younger child may show reluctance to take part in the physical process of giving the data in other ways. In either case the school or college will not be permitted to collect or process the data.

### *Are schools required to ask/tell parents before introducing an automated biometric recognition system?*

Schools are not required by law to consult parents before installing an automated biometric recognition system. However, they are required to notify parents and secure consent from at least one parent before biometric data is obtained or used for the purposes of such a system. It is up to schools

to consider whether it is appropriate to consult parents and pupils in advance of introducing such a system.

*Do schools need to renew consent every year?*

No. The original written consent is valid until such time as it is withdrawn. However, it can be overridden, at any time if another parent or the child objects to the processing (subject to the parent's objection being in writing). When the pupil leaves the school, their biometric data should be securely removed from the school's biometric recognition system.

*Do schools need to notify and obtain consent when the school introduces an additional, different type of automated biometric recognition system?*

Yes, consent must be informed consent. If, for example, a school has obtained consent for a fingerprint/fingertip system for catering services and then later introduces a system for accessing library services using iris or retina scanning, then schools will have to meet the notification and consent requirements for the new system.

*Can consent be withdrawn by a parent?*

Parents will be able to withdraw their consent, in writing, at any time. In addition, either parent will be able to object to the processing at any time but they must do so in writing.

*When and how can a child object?*

A child can object to the processing of their biometric data or refuse to take part at any stage – i.e. before the processing takes place or at any point after his or her biometric data has been obtained and is being used as part of a biometric recognition system. If a pupil objects, the school or college must not start to process his or her biometric data or, if they are already doing this, must stop. The child does not have to object in writing.

*Will consent given on entry to secondary school be valid until the child leaves that school?*

Yes. Consent will be valid until the child leaves the school – subject to any subsequent objection to the processing of the biometric data by the child or a written objection from a parent. If any such objection is made, the biometric data should not be processed and the school or college must, in accordance with the Data Protection Act, remove it from the school's system by secure deletion.

*Can the school notify parents and accept consent via email?*

Yes – as long as the school is satisfied that the email contact details are accurate and the consent received is genuine.

*Will parents be asked for retrospective consent?*

No. Any processing that has taken place prior to the provisions in the Protection of Freedoms Act coming into force will not be affected. From 1 September 2013 (when the new duties in the Act take effect), any school or college wishing to continue to process biometric data from that date must have already sent the necessary notifications to each parent of a child and obtained the written consent from at least one of them before continuing to use their child's biometric data.

*Does the legislation cover other technologies such as palm and iris scanning?*

Yes. The legislation covers all systems that record or use physical or behavioural characteristics for the purpose of identification. This includes systems which use palm, iris or face recognition, as well as fingerprints.