

Habs

HABERDASHERS'
ELSTREE SCHOOLS

Biometric Information Policy

Policy Type	Non - Regulatory
Last Review	Summer 2022
Next Review	Summer 2023

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1 Related Information

1.1 Supporting Documents

The following related information is referred to in this policy:

Data Protection Policy
Terms and Conditions

1.2 Terminology

Parents includes one or both parents, a legal guardian, or education guardian.

School means Haberdashers' Aske's Elstree Schools Limited as Trustee of Haberdashers' Aske's Charity trading as Haberdashers' Girls School **and/or** Haberdashers' Boys' School, as now or in the future constituted (and any successor).

Student or **Students** means any student or students in the School at any age.

2 Biometric Information

Biometric information for students in the senior school is used by the school to facilitate AM and PM registration and for the administration of catering (lunches and tuck) and library loans. Biometric information for staff is used by the school to facilitate maintaining a record of staff signing in and out from the school site. For both students and staff, this biometric data is stored securely on the school network. It is also used to gain access to buildings on the school site.

Permission is sought from parents via the Terms & Conditions attached to an offer of a place. This is again reconfirmed as part of the data capture on the Parent Portal.

Should a parent, student or member of staff object, their school record will be updated accordingly, and they will be given alternative means to register.

Once a parent or member of staff has given consent, the consent is valid until they leave the school, unless consent is withdrawn, which, for a student, must be in writing to the school.

Biometric data that is collected by the school is processed in accordance with the Data Protection Act 1998. In particular:

- The biometric data is stored securely to prevent any unauthorised or unlawful use
- The biometric data is not kept for longer than it is needed, meaning that the school will destroy a student's or staff member's biometric data if they no longer use the system or leaves the school, or, in the case of a student, the parent withdraws consent
- The school ensures that the biometric data is used only for the purposes for which it was obtained and that such data is not unlawfully disclosed to third parties.

3 Biometric information notice

The School wishes to use biometric information about our Students as part of an automated biometric recognition system. This is for the purposes of:

- Electronic registration
- Access to buildings
- Payment for snacks and lunches
- Borrowing books from the Library

Sections 26 to 28 of the Protection of Freedoms Act 2012 (the **Act**) require the School to notify each parent of a child and obtain the written consent of at least one parent before we can use that child's biometric information.

4 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. The School would like to take and use information from our Students' fingerprints and use this information for the purposes described in section 3.

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

The law places specific requirements on the School when it uses biometric information, about Students. For example:

- the School cannot use the information for any purposes other than those described above
- the School must ensure that the information is stored securely
- the School must tell Parents and Students what it intends to do with the information; and,
- the School will not disclose the biometric information to a third party unless permitted by law. The School may however share the information with Live Register for the proper use of the automated biometric recognition system.

5 Providing your consent / objecting

The School requires the written consent of at least one parent to use a Student's biometric information. However, consent will be overridden at any time if the other Parent objects in writing. The School will also seek the consent of a pupil if they have sufficient maturity to exercise their data protection rights. In most cases consent will be sought from pupils going into Year 7 or above. Also, if a Student objects to the use of their biometric information at any time, the School cannot collect or use that information. Parents may also withdraw your consent at any time in writing addressed to the School.

Parents and Students can give their consent by completing and returning the School's biometric information consent form.

Please note that when a pupil leaves the School, or if for some other reason they cease to use the biometric system, their biometric information will be securely deleted.