



Biometric Information Policy

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1 Purpose and Scope

This policy outlines the School's use of biometric information, how it is collected, processed, and stored, and the rights of students, parents, and staff in accordance with the **Protection of Freedoms Act 2012** and the **Data Protection Act 2018**.

2 Related Information

2.1 Supporting Documents

The following related information is referred to in this policy:

Data Protection Act 2018
Data Protection Policy
Terms and Conditions
Privacy Notice for Parents of Younger Students
Privacy Notice for Older Students
Protection of biometric data of children in schools and colleges (publishing.service.gov.uk)
The Protection of Freedoms Act 2012

2.2 Terminology

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

School means Haberdashers' Boys' School and/or Haberdashers' Girls' School which are operated by Haberdashers' Aske's Elstree Schools Limited, the Schools Trustee of Haberdashers' Aske's Charity.

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

3 Biometric Information

Biometric information refers to physical or behavioural characteristics used for identification purposes. The School uses biometric information for:

- Administration of catering (break and lunch) for students in the senior school.
- Library loans.
- Secure access to buildings for both students and staff.

Biometric data is stored securely on the school network and is never stored as an actual fingerprint image. Instead, a unique template is generated and encrypted.

4 Legal Compliance and Consent

Under Sections 26 to 28 of the Protection of Freedoms Act 2012, the School must:

- **Students:** Parental consent is obtained via the Terms & Conditions attached to an offer of a place and reconfirmed through the data capture process on the Parent Portal.
- **Staff:** staff members must be informed and given a choice. Biometric enrolment is voluntary, and staff may opt for an alternative method (e.g., PIN access). Consent is obtained as part of the onboarding process and remains valid until withdrawn.
- **Objections & Withdrawal:** If a parent, student, or staff member objects to the use of biometric data, their school record will be updated, and they will be provided with an alternative means of access or registration. Consent remains valid until the individual leaves the school unless it is withdrawn in writing.

4.1 Data Protection and Security

The school ensures that:

- Biometric data is securely stored to prevent unauthorised or unlawful use.
- Data is not retained beyond its necessity and will be deleted when:
 - A student or staff member leaves the school.
 - Consent is withdrawn (either by the individual or, for students under 14, by their parent/guardian).
- Biometric data is used only for its intended purpose and is not disclosed to third parties unlawfully.

5 Biometric information and how it will be used

Biometric information refers to a person's physical or behavioural characteristics that can be used for identification purposes. The School collects and processes biometric data as part of an automated biometric recognition system. This system takes measurements from an individual's fingerprints and converts them into a digital template. No fingerprint images are stored.

5.1 Legal and Security Considerations

The School complies with the Protection of Freedoms Act 2012, the Data Protection Act 2018, and UK GDPR when processing biometric data. This means:

- **Purpose limitation:** Biometric data will only be used for the specific purposes outlined in this policy.
- **Security:** The information is stored securely to prevent unauthorised or unlawful use.
- **Transparency:** Parents and students will be informed about how biometric data is used.
- **Restrictions on sharing:** The School will not disclose biometric data to third parties unless permitted by law. However, the data may be shared with Live Register, the provider of the biometric recognition system, for system functionality and maintenance.

6 Providing your consent / objecting

The School requires the written consent of at least one parent before collecting or using a Student's biometric information. However:

- If the other parent objects in writing, consent will be overridden, and the School will not process the student's biometric data.
- The School will also seek the student's own consent if they are deemed mature enough to exercise their data protection rights. Typically, this applies to students entering Year 7 or above.
- If a student objects to the use of their biometric information at any time, the School cannot collect or use it.
- Parents may withdraw consent at any time by providing written notice to the School.

Consent is given by completing and returning the School's biometric information consent form.

When a student leaves the School, or if they stop using the biometric system for any reason, their biometric information will be securely deleted.

Appendix 1 – Frequently Asked Questions

1. What is biometric data?

Biometric data means personal information resulting from specific technical processing of an individual's physical, psychological or behavioural characteristics. This data allows for the unique identification of a person, such as facial images, voice recognition or fingerprints.

2. How do we use the information?

The biometric fingerprint data collected by Haberdashers' Elstree Schools is used to facilitate cashless catering, library loans and secure access to buildings.

3. How do I give or deny consent?

The School provides a biometric information consent form, which must be completed and returned. Parents can give or deny consent by filling out this form.

4. What if I do not wish to give consent to Haberdashers' Elstree Schools use of my child's biometric data?

If you do not provide consent for the use of your child's biometric data, the School will offer an alternative method for accessing the relevant facilities. In this case, your child will be provided with a pin code instead of using biometric fingerprints.

5. What information should schools provide to parents/students to help them decide whether to object or for parents to give their consent?

Any consent or objection regarding the use of biometric data must be an **informed decision**. To support this, the School provides parents with full details about:

- The type of biometric system in use.
- The nature of the biometric data being processed.
- The purpose of collecting and using the data.
- How the data is collected, stored, and used.

Students will also receive information in a way that is appropriate for their age and understanding.

6. What if one parent disagrees with the other?

If the School wishes to collect or use a child's biometric data, each parent must be notified. If one parent objects in writing, the School cannot collect or process the child's biometric data, even if the other parent has provided consent.

7. How will the student's right to object work in practice – must they do so in writing?

A student does not need to object in writing.

- **Students aged 13 and over:** They may clearly state their objection verbally or in writing.

- **Students under 13:** If a younger student shows reluctance or refuses to take part in the biometric process, the School will not proceed with collecting or using their biometric data.

In all cases, the School must respect the student's objection and provide an alternative means of access.

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

Schools are not legally required to consult parents before introducing a biometric recognition system. However, they must notify parents before obtaining or using biometric data. The School must secure written consent from at least one parent before processing a child's biometric information. Schools may choose to consult parents and students before introducing such a system, depending on the circumstances.

9. Do schools need to renew consent every year?

No. Once given, written consent remains valid until withdrawn. However, consent can be overridden, at any time if another parent or the student objects in writing. When a student leaves the school, their biometric data will be securely deleted from the system.

10. 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 and specific to the type of biometric data being used. For example, if a school originally obtained consent for a fingerprint system for catering and later introduced iris or retina scanning for library access, the School must notify parents and obtain new consent for the additional system.

11. Can consent be withdrawn by a parent?

Yes. A parent can withdraw consent at any time by providing written notice to the School. Additionally, either parent can object in writing, which would prevent the School from processing the child's biometric data.

12. When and how can a student object?

A student can object at any stage, whether before or after biometric data has been collected. If a student objects:

- The School cannot collect their biometric data.
- If data has already been collected, the School must stop using it.

The student does not need to object in writing; verbal objection or refusal to participate is sufficient.

13. Will consent given on entry to secondary school be valid until the student leaves that school?

Yes. Consent remains valid until the student 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 consent is withdrawn, the School must securely delete the biometric data in accordance with the Data Protection Act 2018.

14. 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 and can be verified.

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

Yes. The legislation applies to all biometric recognition systems that record or use physical or behavioural characteristics for identification purposes. This includes systems which use palm, iris or face recognition, as well as fingerprints.

Any system that processes this type of data is subject to the same notification and consent requirements outlined in the legislation.