

Biometric Info

Since July 2012, the King's School have operated a cashless catering system. The system provides a more efficient, faster and ultimately better quality of service with the following specific benefits:

- Fewer students carrying cash in school.
- Students eligible for Free School Meals are coded into the system, therefore all students are treated the same at the till.
- Parents have visibility through the online portal of what their child has bought
- Very quick transaction time at the till.
- Ensures dinner money is spent as intended.

There is one online payment system for both school meals and trips / visits.

Since July 2012, we have used Photographic cards with a contactless chip in to identify students and make payments. Whilst these have been successful, there are significant numbers that are lost and broken every week and they are costly to replace. We have therefore introduced the technology that will allow us to use finger prints as the identification and payment method. The fingerprint stored is not an image. When the finger is scanned in, a long sequence of numbers and letters are stored. These cannot be changed back into an image. Only the number and letter sequence is recognised by the reading machines.

This is optional for all students.

As per current legislation we are operating an 'Opt In' policy and therefore require you to complete the attached form. We are required to notify each parent of a child and obtain the written consent of at least one parent before being able to use a child's biometric information for an automated system. If you choose not to have your child registered on the Biometric System they will simply continue to use their contactless card.

Consent given by one parent will be overridden if the other parent objects in writing to the use of their child's biometric information. Similarly, if your child objects to this, the school cannot collect or use his/her biometric information for inclusion on the automated recognition system.

You can also object to the proposed processing of your child'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. Even if you have consented, your child can object or refuse at any time to their biometric information being taken/used. His or her objection does not need to be in writing. We would appreciate it if you could discuss this with your child and explain to them that they can object to this if they wish.

If you give consent to the processing of your child's biometric information, please sign, date and return the consent form provided by the school. Please note that when your child leaves the school, or if for some other reason he/she ceases to use the biometric system, his/her biometric data will be securely deleted.

What Biometric Data is held by the school?

Biometric information is information about someone's physical or behavioural characteristics that can be used to identify them. There are many possible biometrics, including, for example, a digital photograph, fingerprint, or hand shapes.

The King's School will be recording a biometric measurement taken from a finger, but not a fingerprint image. The information is stored in a highly secure database and is only used by the school for the purpose of cashless catering.

The school will not use the biometric information for any purpose other than that stated above. The school will store the biometric information collected securely in compliance with the Data Protection Act 1998. The school will not share this information with anyone else and will not unlawfully disclose it to any other person.

The data held by the school on our IT systems is useless and cannot be interpreted back into a usable fingerprint image. The data is stored in an array in the RAM of the Biometric Controller and is also permanently stored on the hard drive of the Bio Controller to be restored in the event of a reboot.

Below is an example of a template code for an individual finger.

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OX417741414142514141414445415141414151415341414D415A4141414141414174774541414C71  
4777346C5869656D6C574945494A764A6B42466D6837616C4E764D704F517874517A706A4A395A3  
1784935686C4177395366726E777645576357386C4573314B426F47443166694170675559704C763  
168423642682A7043
```

The solution is secure because the matching can only be done by the individual's consent as the finger has to be presented to the device for matching. We do not hold images of fingerprints in our system.

The biometric data is encrypted using a 256 bit AES key that is built into the Finger print scanners hardware. Also the stored file is encrypted using a different 256 bit AES key built into the matching algorithm supplied by Secugen and generated by a unique license purchased for each site. This is more secure than the ANSI and ISO standards that government department's use as the Secugen Template is encrypted and the ANSI and ISO standards are not.

The technology provided for this method of identification meets with BECTA guidelines and also allows students the option to opt out of the scheme and use a contactless card instead. Under the data protection act the school cannot allow access to this data by anyone for any other means than for the purpose the data was collected and that is to identify an individual within the solution we supply. Any biometric data that belongs to an individual that leaves the school is purged which is also in line with the BECTA guidelines.

Frequently Asked Questions

How are students and staff recognised by the system?

All students and staff will be registered by biometric measurement. The biometric measurement takes a part image of some of the coordinates of the fingerprint. This information is then converted, encrypted and stored as a unique number. This data cannot be converted back into any image of a fingerprint, nor can it be used by any other source for identification purposes.

When giving or withdrawing consent, what if one parent disagrees with the other?

We are required to notify each parent of a child whose biometric information we wish to collect/use. If one parent objects in writing, then the school is not 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 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.

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 will 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, the school will have to meet the notification and consent requirements for the new system.

Can consent be withdrawn by a parent?

Parents can withdraw their consent, in writing, at any time. In addition, either parent is 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 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 primary or 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 must, in accordance with the Data Protection Act, remove it from the school's system by secure deletion.