



## Protection of Biometric Information Policy

<b>Name of Author</b>	<i>Carrie Bignell</i>
<b>Title of Author</b>	<i>Deputy Head</i>
<b>Responsible Committee</b>	<i>Full Governing Body</i>
<b>Date Approved</b>	<i>July 2023</i>
<b>Review Date</b>	<i>July 2024</i>
<b>Target Audience</b>	<i>Staff/ Parents/ Students</i>
<b>Version Control</b>	<i>1.0</i>

*Learn - Persevere - Succeed*

## *Learn - Persevere - Succeed*

### **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; this can include their fingerprints, facial shape, retina and iris patterns, and hand measurements.

Schools and academies that use students' biometric data must treat the data collected with appropriate care and must comply with the data protection principles as set out in the General Data Protection Regulation 2018.

The Information Commissioner considers all biometric information to be personal data as defined by the General Data Protection Regulation 2018; this means that it must be obtained, used and stored in accordance with the Regulation.

Personal data used as part of an automated biometric recognition system must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012. The Protection of Freedoms Act 2012 includes provisions which relate to the use of biometric data in schools, academies and colleges when used as part of an automated biometric recognition system.

Schools and academies must ensure that the parent/carer of each student is informed of the intention to use the student's biometric data as part of an automated biometric recognition system. Parents/carers must be advised that alternative methods to biometric scanning are available for processing identity if required.

The written consent of the parent/carer or the student, where the student is deemed to have the capacity to consent, must be obtained before the data is taken from the student and processed within the biometric recognition system. In no circumstances can a student's biometric data be processed without written consent.

Schools and academies must not process the biometric data of a student where:

- 1) the student (whether verbally or nonverbally) objects or refuses to participate in the processing of their biometric data;
- 2) a parent or student has not consented in writing to the processing; or
- 3) a parent or student has objected in writing to such processing, even if another parent has given written consent.

Schools and academies must provide reasonable alternative means of accessing the services to those students who will not be using an automated biometric recognition system.

### **Biometric Data and Processing**

#### **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). Biometric recognition systems can use many kinds of physical or behavioural characteristics such as those listed above.

#### **What Does Processing Data Mean?**

## *Learn - Persevere - Succeed*

'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. An automated biometric recognition system processes data when:

- 1) recording students' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
- 2) storing students' biometric information on a database system; or
- 3) using that data as part of an electronic process, for example, by comparing it with biometric information stored on a database in order to identify or recognise students.

### **Who Is Able to Give Consent?**

The Data Protection Act gives students rights over their own data when they are considered to have adequate capacity to understand. Most students will reach this level of understanding at around age 13. For this reason, for most students in a secondary school, it will normally be up to the individual student to decide whether or not to provide biometric data.

Where the school considers that the student does not have the capacity, or they are under the age of 13, parents/carers will be asked to provide written consent.

### **Alternative to Biometric**

The school will provide an alternative to biometric scanning for any parent/student objecting to the processing of biometric data. This will be a PIN number given to the student.

### **Length of Consent**

The original written consent is valid until such time as it is withdrawn. However, it can be overridden, at any time either parent/carer or the student themselves objects to the processing (subject to the parent's/carer's objection being in writing). When the student leaves the school, their biometric data will be securely removed from the school's biometric recognition system.