



BIOMETRIC DATA POLICY

| | |
|---|-----------------|
| THIS POLICY WAS APPROVED: | SUMMER 2018 |
| THIS POLICY WILL BE REVIEWED: | SUMMER 2021 |
| MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW: | DIRECTOR OF ICT |

Biometric Data Policy

1. Introduction

- 1.1 Anglian Learning and the individual schools within the Trust hold biometric data to support the smooth operation of the catering facilities and the management of the pupil's account. This policy details the purpose, use and management of the biometric data and details the procedures to be followed in order to ensure that the Trust complies with the General Data Protection Regulations and the Data Protection Act.
- 1.2 The Trust will have due regard to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012, the Human Rights Act 1998 and to Safeguarding requirements.
- 1.3 This policy and the procedures therein detailed, applies to all of the biometric data held by the Trust which is managed and monitored in accordance with this policy.

2. Biometric Data & Processing

2.1 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.

The Information Commissioner considers all biometric information to be personal data as defined by the General Data Protection Regulations and Data Protection Act.

The Protection of Freedoms Act 2012 includes provision which relate to the use of biometric data in schools and colleges when used as part of an automated biometric recognition system. These provisions are in addition to the requirements of the Data Protection Act.

2.2 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). Information from the individual is automatically compared with biometric information stored in the system to see if there is a match in order to recognise or identify the individual.

2.3 What does processing data mean?

'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:

- a) Recording biometric data of a pupil, for example, taking measurements from a fingerprint via a fingerprint scanner;

- b) Storing pupils biometric information on a database system; or
- c) 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 pupils.

3 Biometric Data Procedures

- 3.2 The Trust ensures that each parent of a child is notified of the option to log biometric data as part of an automated biometric recognition system for their child to access their account.
- 3.3 The parents are provided with full information as to the alternatives that are available should they wish not to provide consent.
- 3.4 The written consent of at least one parent/carer must be obtained before the data are taken from the child and used (i.e. 'processed' – see 3 below). This applies to all pupils in schools and colleges under the age of 18. In no circumstances can a child's biometric behaviour be processed without written consent.
- 3.5 Should one parent/carer provide written consent and another parent/carer object then the biometric data will not be taken or will be destroyed
- 3.6 For new pupils year 7 onwards, prior to the biometric data being taken it will be verbally explained to them as to what their parents have consented to and they will also be requested to provide written consent. Should they object then the biometric information will not be taken.
- 3.7 At the start of each academic year the form teacher will explain to their pupils that they have a right to withdraw consent should they wish to with regards to biometric data and if any pupil expresses a wish to do so then the data will be destroyed.
- 3.8 Should the Trust wish to use the biometric data for any other purpose than that of operating the pupils account for catering then parents and the pupils will be informed and a fresh consent will be sought from the parent and the pupil.
- 3.9 All biometric data will be immediately destroyed once the pupil leaves the school.

4 Complaints procedure

- 4.2 Complaints concerning the Trust's use of biometric data should be made in writing to the Data Protection Officer.

5 Monitoring Compliance

- 5.2 All staff involved in the processing of biometric data will be made aware of this policy and will only be authorised to use the biometric data in a way that is consistent with the purposes and procedures contained therein.
- 5.3 All staff with responsibility for accessing, recording, disclosing or otherwise processing biometric data will be required to undertake data protection training.

6 Policy review

- 6.2 The Trust's usage of biometric and the content of this policy shall be reviewed periodically as required with reference to the relevant legislation or guidance in effect at the time.