



Biometric Data Policy

Protection of Biometrics Policy Statement

Kirton Lindsey Primary School is committed to protecting the personal data of all its pupils and staff, this includes any biometric data we collect and process. We collect and process biometric data in accordance with relevant legislation and guidance to ensure the data and the rights of individuals are protected. This policy outlines the procedures the school follows when collecting and processing biometric data.

Introduction

1.1 Schools and colleges that use pupils' biometric data must treat the data collected with appropriate care and comply with the data protection principles as set out in the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act 2018 (DPA).

1.2 Where the data is to be used as part of an automated biometric recognition system, the school must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.

1.3 The school must ensure that each parent/carer of a child is notified of the school's intention to use the child's biometric data as part of an automated biometric recognition system.

1.4 The written consent of at least one parent/carer must be obtained before the data is taken from the child and used (i.e. 'processed'). In no circumstances can a child's biometric data be processed without written consent.

1.5 The school must not process the biometric data of a pupil where:

- The child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
- No parent/carer has consented in writing to the processing; or
- A parent/carer has objected in writing to such processing, even if another parent/carer has given written consent.

1.6 Schools must provide reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system.

What is Biometric Data?

2.1 Biometric data means personal information about an individual's physical or behavioural characteristics that can be used to identify that person; this can include (but is not limited to) their fingerprints, facial shape, retina and iris patterns, and hand measurements.

2.2 Biometric data is classified as Special Category data under the GDPR and DPA. A lawful basis for processing under Article 9 of GDPR must be identified by the school. For the purposes of this document, the lawful basis is Article 9(2)(a) Consent.

2.3 Biometric data must be obtained, used and stored in accordance with the GDPR and DPA.

2.4 In line with GDPR requirements, a Privacy Impact Assessment must be carried out before the biometric data system is implemented, assessing any risks to data subjects and the measures the School will take to minimise the risks.

2.5 The Protection of Freedoms Act 2012 includes provisions 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 1998 and 2018.

What is an Automated Biometric Recognition System?

3.1 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.

3.2 Biometric recognition systems can use many kinds of physical or behavioural characteristics such as those listed in 2.1 above.

What Does Data Processing Mean?

4.1 '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:

- Recording pupils' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
- Storing pupils' biometric information on a database system; or
- 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.

What Biometric Data is used at Kirton Lindsey Primary School?

Currently at Kirton Lindsey Primary School biometric data is not used and is not requested for any school systems.

Associated Resources

DfE guidelines for Protection of Biometric Information of Children in Schools

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692116/Protection_of_Biometric_Information.pdf

DfE guidelines for schools on communicating with parents and obtaining consent

<https://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility>

British Standards Institute guide to biometrics

<https://shop.bsigroup.com/Browse-By-Subject/Biometrics/?t=r>

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