

# Biometric Data

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Reviewed	Summer 2024
Name of owner/author	SJE/JMA
Approval by	Executive Leadership Team Team/Governors
Target Audience	Whole School Community/Public
Where available	Website, Staff Handbook
Review Date	Summer 2025

## **1 Policy Statement**

Biometric data is information linked to a reading or measurement of a person's biological features of characteristics: most commonly fingerprints or palm prints, iris or retina scans and other facial recognition technology and including DNA.

At Ewell Castle School we use biometric data in the form of fingerprinting to provide door and gate access and to pay for food and/or provide a record of lunch.

Under the GDPR, personally identifiable biometric data is defined as 'special category' personal data, which means that explicit consent is required from an individual to use the biometric data.

The Protection of Freedoms Act 2012 states the following:

- 1.1 Written consent is required from at least one parent for all pupils under the age of 18 where biometric data personal information is used in an automated recognition system.
- 1.2 Schools do not need to have written consent from the pupil, but they do need to respect pupils' wishes should they refuse to participate. A pupil's objection will always override parental consent in this regard and the objection of one parent can override the consent of another. Consent may also be withdrawn at any stage.
- 1.3 Reasonable alternative arrangements (such as a PIN number for gate access, for example) must be provided for pupils or staff who do not use automated biometric recognition systems either because their parents have refused consent (or a parent has objected in writing) or due to the pupil's own refusal or the staff member's refusal to participate.
- 1.4 Alternative arrangements ensure that pupils and staff do not suffer any disadvantage or difficulty in accessing services, school premises etc. as a result of them not participating.

## **2 Procedure**

- 2.1 All parents are asked to complete a biometric data consent form for their child. The data will be used to enable security access and to pay for food and/or record lunch.
- 2.2 All staff are offered the opportunity to provide their biometric data (fingerprint) for the same purpose.
- 2.3 The data that is held will not be used by any other organisation for any other purpose, except solely as necessary for the purposes stated above and the School will not use biometric information for any reason other than those stated above.
- 2.4 If parents object to the use of their child's biometric information or a member of staff does not wish to provide biometric information, the School will endeavour to provide a work around to the system without using biometrics.
- 2.5 Once a pupil or member of staff stops using the biometric recognition system, their biometric information will be securely deleted by the School in accordance with the Information Commissioner's Guidance.
- 2.6

## **3 Review and Development**

### **3.1 Procedure**

This document, together with the effectiveness of its procedures, is reviewed annually by the Executive Leadership Team and as events or legislation change requires.

#### **4.2 Links with other Policies**

This policy should be read in conjunction with the following documents:

Data Protection policies

Privacy Notices