



EASTBROOK COMPREHENSIVE SCHOOL

BIOMETRIC DATA POLICY

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Controlled Document

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1	01/03/2024	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	New Policy

Contents:

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1. INTRODUCTION

This policy fulfils the Schools obligation to have an appropriate policy in place where processing of special category biometric data is being used.

Biometric data means personal information about an individual's physical or other characteristics that can be used to identify that person; this can include fingerprints, facial shape, retina and iris patterns and hand measurements.

2. CONSENT

The School takes collection and storage of the data very seriously and abides by the principles of the UK General Data Protection Regulation and the Data Protection Act 2018 and The Protection of Freedoms Act 2012. The School store all biometric data securely for the purposes of identification only. Biometric data is only processed for the purpose of which it was obtained, and which we have notified parents or legal guardians, and it is not unlawfully disclosed to third parties.

In accordance with The Protection of Freedoms Act 2012, the School notifies every pupils parents and/or legal guardian of its practice in collecting and processing biometric data and obtains written consent from at least one parent and/or legal guardian.

Under no circumstances will the School collect or process biometric data of an individual without their consent. All consent will be given freely, specific, informed, and unambiguous and will be obtained through a clear affirmative action. The School will obtain consent through consent forms when the individual joins the School.

The School will ensure that staff and pupils and their parents will be informed of the Schools intention to process the individual's personal data, this will be carried out through readily available privacy notices.

3. THE PURPOSE

The School use a biometric identification system for cashless catering to enable students to purchase food and drink.

The automated recognition software converts the biometric data (e.g., fingerprint) into a mathematical algorithm. The image itself is then deleted meaning that the information which is stored cannot be used to recreate the original image.

4. ALTERNATE USE TO BIOMETRIC SYSTEM

If consent is not provided the School must provide an alternative way to ensure usage of the facilities managed by biometric data. This is in the form of a pin code. The School does not store the individuals pin codes.

5. PRINCIPLES AND ACCOUNTABILITY

- Biometric data will only be processed in line with the requirements.

- The School will implement appropriate technical measures to demonstrate that the biometric data is in line with the GDPR Principles
- The School will ensure the rights and freedom of the individuals are not adversely affected by the processing of any biometric data
- The School's privacy notice will provide clear and transparent details of the use of biometric data
- The School will produce a Data Protection Impact Assessment on the processing of the biometric data and highlight any high or key risks.
- The School does not allow access to this data by anyone for any other means than for the purpose the data was collected.

6. DATA RETENTION

The School will not keep the data for longer than necessary in line with the School's retention and deletion policy. If an individual or parent requests to withdraw their consent of their biometric data, this will be done immediately and removed from the School's system and a PIN code will be provided.

When a pupil or staff member leave the School, their biometric data will be securely erased in line with the School's policy.

POLICY REVIEW

The DPO is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

7. LINKS WITH OTHER POLICIES

This Biometric Data Policy is linked to the School:

- Data Protection Policy
- Data Protection Impact Assessment Policy
- Freedom of Information Policy
- Security Incident and Data Breach Policy
- Acceptable Use Policy
- Record Retention and Deletion Policy

The Information Commissioner also provides a free helpdesk that can be used by anyone and a website containing a large range of resources and guidance on all aspects of Information Law for use by organisations and the public. See www.ico.org.uk