

# Greig City Academy



## Protection of biometric data policy

“Show by a good life that your works are done by gentleness  
born of wisdom.”

James 3:13

This policy was approved by the Governing Body on January 31, 2023.

It will be reviewed in January 2024.

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## Protection of biometric data policy

### 1. Biometric data: definitions

1.1 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.

1.2 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. How the school uses biometric data

2.1 The school uses biometric data in the form of fingerprinting for library loans and to pay for food and/or provide a record of lunch.

2.2 Under the General Data Protection Regulations (GDPR) 2018 and the Data Protection Act 2018, 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.

2.3 The Protection of Freedoms Act 2012 states that:

- i. 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.
- ii. 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 Consent may also be withdrawn at any stage.
- iii. Reasonable alternative arrangements 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. For example, swipe cards.
- iv. Alternative arrangements ensure that pupils and staff do not suffer any disadvantage or difficulty in accessing services as a result of them not participating.

### 3. Procedures

3.1 All parents are asked to complete a biometric data consent form for their child on joining the school.

3.2 The Academy will not process the biometric data of a pupil (under 18 years of age) where:

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

- 3.3 All staff are offered the opportunity to provide their biometric data (fingerprint) for the same purpose.
- 3.4 The data that is held securely (encrypted) 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 (2.1).
- 3.5 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 an alternative to the system without using biometrics. Swipe cards are available alternatives.
- 3.6 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.
4. Policy review
  - 4.1 This policy and the effectiveness of its procedures, are reviewed annually by the Senior Leadership Team and as events or legislation changes require.
5. Links with other policies
  - 5.1 This policy should be read in conjunction with the Academy's Data Protection Policy.

**Covid control:** Due to the coronavirus pandemic the Academy suspended the use of the biometric fingerprint equipment as a measure to prevent cross contamination. This continues for the foreseeable future. We will be guided by national and local public health and safety advice and the needs of the school as to when the system may be re-instated.