



## Biometric Information Policy

*Protection of biometric information of children in schools and colleges*

Date Prepared	March 2021
Author	G Chisnell - CEO
Checked by (trustee)	Trust Board
Date ratified	30.3.21
Review date	March 2022

## Contents

Item	Content	Page
1	Introduction	1
2	Processing biometric data	1
3	Notification and parental consent	2
4	The pupil's right to refuse	2
5	Providing alternative arrangements	2
6	Useful links	2

### 1. Introduction

*This policy has been developed in accordance with the principles established by the Protection of biometric information of children in schools and colleges 2018, The Protection of Freedoms Act 2012 and General Data Protection Regulations in accordance with the Data Protection Act 2018.*

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.

Schools may use systems that recognise pupil's face or fingerprint. This can include access to computers and tablets through face recognition.

### 2. Processing biometric data

Schools wishing to use biometric data across Veritas MAT will:

Request written consent from the pupil's parents

Inform the parent of how the biometric data will be used

Record pupils' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;

Securely store pupils' biometric information on a database system;

### **3. Notification and parental consent**

- Schools will notify each parent of a pupil under the age of 18 if they wish to take and subsequently use the child's biometric data as part of an automated biometric recognition system.
- As long as the child or a parent does not object, the written consent of one parent will be required for a school to process the child's biometric information. A child does not have to object in writing but a parent's objection must be written.
- The school will inform parents to let them know about the type of biometric information to be taken and how it will be used.
- The school will inform the parent of their right to refuse withdraw their consent. The school will then inform the parents of reasonable alternative arrangements for pupils whose information cannot be processed.
- Where neither of the parents of a child can be notified, section 27 of the Protection of Freedoms Act 2012 sets out who should, in such circumstances, be notified and who can give consent: (a) if the child is being 'looked after' by a local authority or is accommodated or maintained by a voluntary organisation (i.e. a not-for-profit organisation), the local authority, or as the case may be, the voluntary organisation must be notified and their written consent obtained.

### **4. The pupil's right to refuse**

If a pupil under 18 objects or refuses to participate (or to continue to participate) in activities that involve the processing of their biometric data, the school will ensure that the pupil's biometric data are not taken/used as part of a biometric recognition system. A pupil's objection or refusal overrides any parental consent to the processing.

### **5. Providing alternative arrangements**

Should a parent or pupil refuse to participate in sharing their biometric information, the school will take reasonable alternative arrangements. The alternative arrangements will ensure that pupil does not suffer any disadvantage or difficulty in accessing services or premises in the school as a result of their not participating in an automated biometric recognition system. Likewise, such arrangements should not place any additional burden on parents whose children are not participating in such a system.

### **6. Useful links**

DfE guidance on protection of biometric information:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/692116/Protection\\_of\\_Biometric\\_Information.pdf](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>

ICO guide to data protection: [http://www.ico.gov.uk/for\\_organisations/data\\_protection/the\\_guide.aspx](http://www.ico.gov.uk/for_organisations/data_protection/the_guide.aspx)

ICO guidance on data protection for education establishments: [http://www.ico.gov.uk/for\\_organisations/sector\\_guides/education.aspx](http://www.ico.gov.uk/for_organisations/sector_guides/education.aspx)

British Standards Institute guide to biometrics: [Biometrics Website for news updates standards - biometric systems - BSI Shop](#)