



ANGLIAN LEARNING

*Dynamic, empowered learners who thrive and lead in  
their communities: locally, nationally and globally*

# BIOMETRICS POLICY

THIS POLICY WAS APPROVED:	SUMMER 2024
POLICY VERSION:	3.0
THIS POLICY WILL BE REVIEWED:	SUMMER 2027
MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW:	HEAD OF GOVERNANCE, COMPLIANCE AND RISK
THIS POLICY WAS CONSULTED WITH:	DIRECTOR OF IT, DPO
THIS POLICY WAS DISTRIBUTED TO:	DPLs, CONNECT

## **1. 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.

All biometric data is considered to be special category data under the UK General Data Protection Regulation (UK GDPR). This means the data is more sensitive and requires additional protection as this type of data could create more significant risks to a person's fundamental rights and freedoms.

This policy complies with The Protection of Freedoms Act 2012 (sections 26 to 28), the Data Protection Act 2018 and the UK GDPR.

## **2. What is an Automated Biometric Recognition System?**

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. The Legal Requirements under UK GDPR**

'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.

As biometric data is special category data, in order to lawfully process this data, the Trust must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the Trust relies on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained using the consent form in the attached Appendix A

The Trust processes biometric data as an aim to make significant improvements to our canteen and lunch facilities; this is to do away with the need for cash or ID cards which can be costly to maintain.

## **4. Consent and Withdrawal of Consent**

The Trust will not process biometric information without the relevant consent.

- When obtaining consent for pupils, both parents will be notified that the school intends to use and process their child's biometric information. The school only requires written consent from one parent (in accordance with the Protection of Freedoms Act 2012), provided no parent objects to the processing.
- If a parent objects to the processing, then the school will not be permitted to use that child's biometric data and alternatives will be provided.

- The child may also object to the processing of their biometric data. If a child objects, the school will not process or continue to process their biometric data, irrespective of whether consent has been provided by the parent(s).
- Where there is an objection, the school will provide reasonable alternatives which will allow the child to access the same facilities that they would have had access to had their biometrics been used.
- Pupils and parents can also object at a later stage to the use of their child's biometric data. Should a parent wish to withdraw their consent, they can do so by writing to the school (contact details on the school website) requesting that the school no longer use their child's biometric data.
- Pupils who wish for the school to stop using their biometric data do not have to put this in writing but should inform the school office.
- At the start of each academic year the form teacher will explain to their pupils that they have a right to withdraw consent should they wish to with regards to biometric data and if any pupil expresses a wish to do so then the data will be destroyed.
- Should the Trust wish to use the biometric data for any other purpose than that of operating the pupils account for catering then parents and the pupils will be informed, and a fresh consent will be sought from the parent and the pupil.
- The consent will last for the time period that your child attends the school (unless it is withdrawn).

## **5. Retention of Biometric Data**

Biometric data will be stored by the Trust for as long as consent is provided (and not withdrawn). Once a pupil leaves, the biometric data will be deleted from the Trust's system no later than 30 days.

## **6. Storage of Biometric Data**

At the point that consent is withdrawn, the Trust will take steps to delete their biometric data from the system and no later 30 days.

Biometric data will be kept securely and systems will be put in place to prevent any unauthorised or unlawful access/use.

The biometric data is only used for the purposes for which it was obtained and such data will not be unlawfully disclosed to third parties.

## Consent form for using pupils' biometric data

We run a biometric cashless catering system for the purchase of school meals. This means that your child can be enrolled on our Biometric system, taking a biometric image of your child's fingerprint. This is not stored as an image but is converted using a mathematical process to change the image into what is essentially a string of random numbers.

Under the Protection of Freedom Acts 2012, we need the consent of parents / carers to use biometric data of pupils under the age of 18. As stated in the guidance, in order to be able to use your child's biometric information, the written consent of at least one parent is required. However, consent given by one parent will be overridden if the other parent objects in writing to the use of their child's biometric information. You can also object to the proposed processing of your child's biometric information at a later stage or withdraw any consent you have previously given. This means that, if you give consent but later change your mind, you can withdraw this consent. Please note that any consent, withdrawal of consent or objection from a parent must be in writing.

Even if you have consented, your child can object or refuse at any time to their biometric information being taken/used. Your child's objection does not need to be in writing. We would appreciate it if you could discuss this with your child and explain to them that they can object to this if they wish. The school/college is also happy to answer any questions you or your child may have. If you do not wish your child's biometric information to be processed by the school/college, or your child objects to such processing, your child may be provided with a unique PIN number or payment card. Parents/Carers can add money to their child's account using **XXXX**.

If you give consent to the processing of your child's biometric information, please sign, date and return the enclosed consent form to the school/college. Please note that when your child leaves the school/college, or if for some other reason he/she ceases to use the biometric system, his/her biometric data will be securely deleted.

For further information on the processing of biometric data, please see our Biometrics Policy which is available on the school or Trust website.

We place great emphasis on personal data protection, and you can find full details regarding our processing activities in our Privacy Policy, available at <https://anglianlearning.org/gdpr-policies/>. Our Data Protection Officer (DPO) is Judicium Consulting Limited who can be contacted at the following email address [dataservices@judicium.com](mailto:dataservices@judicium.com)

I consent to Anglian Learning and/or its member schools using biometric data of my child in the following ways:

USE OF BIOMETRIC DATA	TICK ☐
I am happy for the school to use my child's fingerprints for them to receive school meals.	<input type="checkbox"/>
I am happy for the school to use my child's fingerprints for them to add money to their food account.	<input type="checkbox"/>
I am <b>NOT</b> happy for the school to use my child's biometric data in these ways.	<input type="checkbox"/>

Pupil name:

Form:

Parent name:

Signature:

Date: