



LYDIATE  
LEARNING  
TRUST

# Biometrics Policy (LLT)



LYDIATE  
LEARNING  
TRUST

ENGAGE, ENABLE,  
EMPOWER

<i>Origination</i>	<i>Authorised by</i>	<i>Policy Date</i>	<i>Review Date</i>	<i>Page 1 of 5</i>
<b>VSU/PHA</b>	<b>LLT Board</b>	<b>Jun 2022</b>	<b>Jun 2024</b>	

# Biometrics Policy (LLT)

## 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 General Data Protection Regulation (GDPR). This means the data is more sensitive and requires more protection and 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 GDPR.

The school has carried out a data protection impact assessment with a view to evaluating whether use of biometric data is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of biometrics and the contents of this policy.

## 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.

## THE LEGAL REQUIREMENTS UNDER 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 school must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the school rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained using the consent form(s) in the attached appendix.

The school process biometric data as an aim to make significant improvements, for example to our canteen and lunch facilities or for pupils to sign in/move around the schools.

## CONSENT AND WITHDRAWAL OF CONSENT

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

<i>Origination</i>	<i>Authorised by</i>	<i>Policy Date</i>	<i>Review Date</i>	<i>Page 2 of 5</i>
<b>VSU/PHA</b>	<b>LLT Board</b>	<b>Jun 2022</b>	<b>Jun 2024</b>	

# Biometrics Policy (LLT)

## Consent for pupils

When obtaining consent for pupils, both parents will be notified that the school intend to use and process their child's biometric information. The school only require 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/their biometric data. Should a parent wish to withdraw their consent, they can do so by writing to the school administration team requesting that the school no longer use their child's biometric data.

The consent will last for the time period that your child attends the school (unless it is withdrawn).

## Consent for staff

The school will seek consent of staff before processing their biometric data. If the staff member objects, the school will not process or continue to process the biometric data and will provide reasonable alternatives. Staff who wish for the school to stop using their biometric data should do so by writing to the IT Manager, via the ICT Helpdesk email.

The consent will last for the time period that the staff member remains employed by the school (unless it is withdrawn).

## **RETENTION OF BIOMETRIC DATA**

Biometric data will be stored by the school for as long as consent is provided (and not withdrawn).

Once a pupil or staff member leaves, the biometric data will be deleted from the school's system no later than 3 working days.

At the point that consent is withdrawn, the school will take steps to delete their biometric data from the system no later than 3 working days after notification.

## **STORAGE OF BIOMETRIC DATA**

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.

<i>Origination</i>	<i>Authorised by</i>	<i>Policy Date</i>	<i>Review Date</i>	<i>Page 3 of 5</i>
<b>VSU/PHA</b>	<b>LLT Board</b>	<b>Jun 2022</b>	<b>Jun 2024</b>	

# Biometrics Policy (LLT)

## Appendix 1:

### Biometric Consent form (parent/carer)

Please sign below if you consent to the school taking and using information from your son/daughter's fingerprint as part of an automated biometric recognition system. This biometric information will be used by the school for the purpose of accessing our canteen and lunch facilities or for pupils to sign in/move around the schools.

In signing this form, you are authorising the school to use your son/daughter's biometric information for this purpose until he/she either leaves the school or ceases to use the system.

If you wish to withdraw your consent at any time, this must be done so in writing and sent to school administration office. Once your son/daughter ceases to use the biometric recognition system, his/her biometric information will be securely deleted by the school no later than 3 working days.

### **Parent consent:**

Having read the above guidance information, I give consent to information from the fingerprint of my son/daughter being taken and used by the school for use as part of an automated biometric recognition system.

I understand that I can withdraw this consent at any time in writing.

Parent Name: .....

Signature: .....

Date: .....

Name of Student: .....

**Please send a copy of this consent form to school administration office**

<i>Origination</i>	<i>Authorised by</i>	<i>Policy Date</i>	<i>Review Date</i>	<i>Page 4 of 5</i>
<b>VSU/PHA</b>	<b>LLT Board</b>	<b>Jun 2022</b>	<b>Jun 2024</b>	

# Biometrics Policy (LLT)

## Appendix 2: Biometric Consent form (staff)

Please sign below if you consent to the school taking and using your fingerprint information as part of an automated biometric recognition system. This biometric information will be used by the school for staff to access our canteen and lunch facilities and/or for staff to sign in/move around the schools.

In signing this form, you are authorising the school to use your biometric information for this purpose until you either leave the school or cease to use the system.

If you wish to withdraw your consent at any time, this must be done so in writing and sent to the IT Manager via the ICT Helpdesk email.

Having read the above guidance information, I give consent to information from my fingerprint being taken and used by the school for use as part of an automated biometric recognition system.

I understand that I can withdraw this consent at any time in writing.

Print Name: .....

Signature: .....

Date: .....

**Please send a copy of this consent form to school administration office.**

<i>Origination</i>	<i>Authorised by</i>	<i>Policy Date</i>	<i>Review Date</i>	<i>Page 5 of 5</i>
<b>VSU/PHA</b>	<b>LLT Board</b>	<b>Jun 2022</b>	<b>Jun 2024</b>	