

North Baddesley Infant School & Nursery

Policy for Protection of biometric information of children in schools and colleges

This policy was agreed and formally adopted at the Governing Body meeting on 24.3.22

This policy will be reviewed by the governing body on a 3-Yearly basis.

Last review: October 2023



North Baddesley Infant School & Nursery does not currently collect or process biometric information. This policy is in place in the instance that this would become required. Because of this we review this policy every three years unless there is a change to school systems resulting in the collection of biometric information from children.

INTRODUCTION

Schools that use pupils' biometric data must treat the data collected appropriately and comply with the data protection principles set out in the General Data Protection Regulation 2018. Where the data is to be used as part of an automated biometric recognition system, schools must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012. Schools must ensure that the parent/carer of each child is informed of the intention to use the child's biometric data (see 1 below) as part of an automated biometric recognition system.

The written consent of the parent/carer or the child must be obtained before the data is taken from the child and used. In no circumstances can a child's biometric data be processed without written consent. Schools must not process the biometric data of a pupil where:

- The child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
- A parent has not consented in writing to the processing;
- A parent or pupil has objected in writing to such processing, even if another parent has given written consent,

Schools must provide reasonable alternative means of accessing the services to those pupils who will not be using an automated biometric recognition system.

BIOMETRIC DATA IN NORTH BADDESLEY INFANT SCHOOL & NURSERY

The school does not collect any biometric information as a resource for accessing any school systems.

- The library system uses a bar code for each pupil, which is scanned in manually.
- The dinner system uses a personalised token.
- There are no electronic access systems in the school for pupils.

BIOMETRIC DATA AND PROCESSING 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, including their fingerprints, facial shape, retina and iris patterns, and hand measurements. The Information Commissioner considers all biometric information to be personal data as defined by the General Data Protection Regulation; this means that it must be obtained, used and stored in accordance with that Regulation. The Protection of Freedoms Act 2012 includes provisions relating to the use of biometric data in schools and colleges as part of an

automated biometric recognition system. These provisions are in addition to the requirements of the General Data Protection Regulation.

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 to recognise or identify the individual. Biometric recognition systems can use many kinds of physical or behavioural characteristics, such as those listed in 1 above.

WHAT DOES PROCESSING DATA MEAN?

'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, deleting, organising, or altering it. An automated biometric recognition system processes data when:

- recording pupils' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
- storing pupils' biometric information on a database system;
- using that data as part of an electronic process, for example, by comparing it with biometric information stored on a database to identify or recognise pupils.

LENGTH OF CONSENT

The original written consent is valid until such time as it is withdrawn. However, it can be overridden, at any time a parent objects in writing to the processing. When the child leaves the school, their biometric data is securely removed from the school's biometric recognition system.