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The Gilberd School

Biometrics Policy

A biometric recognition system obtains or records information about a person's physical or behavioural characteristics and compares that information with information which has been previously stored to determine whether the person is recognised by the system. The following rules are necessary to ensure that we comply with data protection law and protect the rights of individuals. They ensure that the risks of data processing are well managed.

This policy sets out the rules all staff, governors, contractors and volunteers **must** follow when collecting and managing biometric information.

Policy rules:

1. You must complete a **Data Protection Impact Assessment** (DPIA) for the use of biometric data.
2. The DPIA must be approved by the **Data Protection Officer** prior to the system being used.
3. You must refer to your use of biometric data in your **privacy notices**, ensuring individuals are clear about their rights in relation to its use.
4. You must ensure that all students understand that they can **object** or refuse to allow their biometric data to be taken/used.
5. Wherever feasible and reasonable, you must inform each parent of your intention to collect and process the student's biometric data.
6. A student's biometric information must not be processed unless at least one parent of the student consents, and no parent of the student has withdrawn his or her consent, or otherwise objected, to the information being processed. In addition, student's objection or refusal, overrides any parental consent to the processing, therefore any biometric data must not be processed. DfE Guidance on the Protection of Biometric Data July 2022.
7. You must **document** that consent has been given.
8. You must provide a simple process to **object** and **withdraw consent.**
9. You must **document** if consent is withdrawn, or objections are raised.
10. You must not continue to hold or use biometric data where consent for its use has been **withdrawn**.
11. You must ensure that any Biometric data is **securely destroyed** when no longer used.
12. You must ensure that there is an **alternative arrangement** available for any services which use biometrics.
13. Ensure that biometric data is held in an encrypted form, and that all available technical and organisational **security** measures are applied.
14. Your use of biometric data must be recorded in your **records of processing activities (RoPA)** (Framework document H1).

15. You must not share biometric data with 3rd parties unless there is an **appropriate contract** in place protecting the rights of data subjects.

How must I comply with these policy rules?

We have related policies, procedures and guidance which tell you how to comply with these rules. These include:

- Data Protection Policy
- Data Handling Security Policy
- Data Breach Policy
- Records Management Policy
- Data Protection Rights Procedure
- Consent Procedure
- Data Breach Procedure
- Subject Access Request Procedure
- Surveillance Procedure
- Retention Schedule

If you are unsure how to comply you must seek advice and guidance from your Data Protection Lead.

What if I need to do something against this policy?

If you believe you have a valid business reason for an exception to these policy points, having read and understood the reasons why they are in place, please raise a formal request by contacting the school office.

References

- Data Protection Act 2018 / UK GDPR
- Article 8, The Human Rights Act 1998
- Protection of Freedoms Act 2012
- ICO Biometric data guidance
- DfE - Protection of biometric information of children in schools and colleges – July 2022

Breach Statement

Breaches of Information Policies will be investigated and may result in disciplinary action. Serious breaches of Policy may be considered gross misconduct and result in dismissal without notice, or legal action being taken against you.