

INSPIRING FUTURES

Macmillan
Academy

PROTECTION OF BIOMETRIC INFORMATION OF CHILDREN IN SCHOOLS AND COLLEGES

POLICY DETAILS

Policy Title:	Protection of Biometric Information of Children in Schools and Colleges
Staff name and job title:	Mrs M Brindle – Data Protection Officer
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POLICY REVISION AND APPROVAL HISTORY

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1.1	April 2022	April 2023	New policy	Headteacher
1.2	May 2024	May 2027	Review and update	Headteacher
1.3	September 2025	May 2027	Update name of Data Protection Officer	Headteacher

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1. BIOMETRIC INFORMATION

Schools that use students' biometric data (see 1 below) must treat the data collected with appropriate care and must comply with the data protection principles as set out in the General Data Protection Regulation 2018.

Where the data is to be used as part of an automated biometric recognition system (see 2 below), 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 of the child must be obtained before the data is taken from the child and used (i.e. 'processed' – see 3 below). In no circumstances can a child's biometric data be processed without written consent.

Schools must not process the biometric data of a student where:

- i. The child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
- ii. A parent or student (over the age of 18) has not consented in writing to the processing; or
- iii. A parent or student (over the age of 18) 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 students who will not be using an automated biometric recognition system.

BIOMETRIC DATA AND PROCESSING

2. 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.

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 which relate to the use of biometric data in schools and colleges when used as part of an automated biometric recognition system. These provisions are in addition to the requirements of the General Data Protection Regulation.

3. 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.

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

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

5. WHO IS ABLE TO GIVE CONSENT?

The Data Protection Act gives children rights over their own personal data but this does not apply to biometric data and so parents / carers need to be asked to provide this permission for any student under the age of 18.

Schools and colleges will be required to notify each parent of a child whose biometric information they wish to collect/use. If either parent objects in writing, then the school will not be permitted to take or use that child's biometric data.

6. LENGTH OF CONSENT

The original written consent is valid until such time as it is withdrawn. However, it can be overridden, at any time by either parent or if the child themselves objects to the processing (subject to the parent's objection being in writing). When the student leaves the academy, their biometric data will be securely removed from the academy's biometric recognition system.

7. ALTERNATIVE TO BIOMETRIC

The academy cashless catering system allows for an alternative to biometric scanning and any student objecting to the processing of their biometric data will be issued with a PIN code.

APPENDIX 1

BIOMETRIC PERMISSION

Student
Surname:

Student
Forename:

To cover the entire time that the student is registered at Macmillan Academy

BIOMETRIC PERMISSION

Please complete this form if you consent to Macmillan Academy taking and using information from your son/daughter's fingerprint by Macmillan Academy as part of an automated biometric recognition system. This biometric information will be used by Macmillan Academy for the purpose of cashless catering, library loans, printing and photocopying.

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

Once your son/daughter ceases to use the biometric system his/her biometric information will be securely deleted by the academy.

☐

I **DO** give biometric permission

☐

I **DO NOT** give biometric permission

If you choose not to give permission your son/daughter will be issued with a pin code.

Parent/Guardian name (please print)

Relationship to student

Parent/Guardian Signature _____ Date _____

If you wish to withdraw your consent at any time, this must be done IN WRITING and sent to the Academy at the following address:

MIS/Data Office
Macmillan Academy
Stockton Road
Middlesbrough
TS5 4AG

FOR OFFICE USE

Biometric permission logged in MIS date:

Pin code requested date:



Stockton Road
Middlesbrough
TS5 4AG



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