

Hall Cross  
Academy



# PROTECTION OF BIOMETRIC INFORMATION OF CHILDREN POLICY

Approved By: Local Governing Board  
Date of Approval: May 2024  
Next Review By: May 2025

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# 1

## Introduction

Schools that use students' biometric data 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, 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 as part of an automated biometric recognition system.

The written consent of the parent/carer or the child, where the child is deemed to have the capacity to consent, must be obtained before the data is taken from the child and used (i.e. 'processed'). 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:

- The child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
- A parent or student has not consented in writing to the processing; or
- A parent or student 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.

Hall Cross Academy is committed to protecting the personal data of all its pupils and staff, this includes any biometric data we collect and process.

We collect and process biometric data in accordance with relevant legislation and guidance to ensure the data and the rights of individuals are protected. This policy outlines the procedure the academy follows when collecting and processing biometric data.

This policy applies to all Hall Cross Academy employees, Governors, contractual third parties and partner organisation employees who have access to any data held or provided to/by the Academy. This includes permanent and temporary staff, consultants, contractors and partner companies.



# 2 Policy / Controls

## 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.

## 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 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:

- recording students' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
- storing students' biometric information on a database system; or
- 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.

## Who is able to give Consent

The Data Protection Act gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around age thirteen. For this reason, for most children in a secondary school, it will normally be up to the individual child to decide whether or not to provide biometric data. Where the academy considers that the child does not have the capacity or they are under the age of thirteen, parents/carers will be asked to provide consent.



# 3

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 or college will not be permitted to take or use that child's biometric data.

## **Length of Consent**

The original written consent is valid until such time as it is withdrawn. However, it can be overridden, at any time if either parent or 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.

## **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.



# 4 Consultation

The policy was written by staff within the Academy, but is reviewed annually by the Trust Data Protection Officer and the Governing Body.

## Sources and References

The Protection of Freedoms Act 2012  
UK General Data Protection Act 2011

## Policy Review and Development

The Protection of Biometric Information of Children Policy will be reviewed by the Governors on an annual basis.

Any changes made to this policy will be communicated to all staff, parents/carers and pupils.

## Document Version Change Control

Version:	Date:	Details of changes:
1	28/09/2020	New policy
2	04/10/2021	No changes made
3	26/09/2022	New policy template used
4	14/05/2024	Legislation updated within the Sources and References section



# 5 Appendices

## Biometric Consent Form (parent/carer)

Student Name: ..... Year: .....

Please sign below if you consent to the Academy taking and using information from your child's fingerprint as part of an automated biometric recognition system. This biometric information will be used by the Academy for the purpose of charging for school meals.

In signing this form, you are authorising the Academy to use your child's biometric information for this purpose until they either leave the Academy or cease to use the system.

If you wish to withdraw your consent at any time, this must be done in writing and sent to the Principal. Once your child ceases to use the biometric recognition system, their biometric information will be securely deleted by the Academy.

Parent Consent:

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

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

Parent Name: .....

Signature: .....

Date: .....



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**Biometric Consent Form (student)**

Student Name: ..... Year: .....

Please sign below if you consent to the Academy taking and using information from your fingerprint as part of an automated biometric recognition system. This biometric information will be used by the Academy for the purpose of charging for school meals.

In signing this form, you are authorising the Academy to use your biometric information for this purpose until you either leave the Academy 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 Principal. Once you cease to use the biometric recognition system, your biometric information will be securely deleted by the Academy.

Student Consent:

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

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

Name: ..... Year: .....

Signature: .....

Date: .....





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## Biometric Consent Form (staff)

Staff Name: .....

Please sign below if you consent to the Academy taking and using information from your fingerprint as part of an automated biometric recognition system. This biometric information will be used by the Academy for the purpose of charging for school meals.

In signing this form, you are authorising the Academy to use your biometric information for this purpose until you either leave the Academy 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 Principal. Once you cease to use the biometric recognition system, your biometric information will be securely deleted by the Academy.

Staff Consent:

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

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

Name: .....

Signature: .....

Date: .....

