



BIOMETRIC POLICY

Introduction

The school has a biometric system for cashless catering.

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 fingerprint, facial shape, retina and iris patterns and hand measurements.

The biometric data which our system uses is fingerprints.

All biometric data is considered to be special category data under the UK General Data Protection Regulation (UK GDPR). This means the data is more sensitive and requires more protection.

Legal requirements

The school complies with UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the relevant provisions of the Protection of Freedoms Act in the way it collects and handles biometric data. The school will have regard for the guidance on Biometrics published by the Department of Education and the Information Commissioners Office (ICO).

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 relies on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained using the consent form in the attached appendix.

Notification

Before processing any biometric data relating to students, the school will issue a notification letter to the student and parent(s). This notification will be sent to the parent(s) whom the school knows about.

Consent

The school will not process biometric information without the relevant consent. The school will seek consent at the point of the student registration process and at other times using the form attached to this policy.

Data protection regulations allow children the right to provide consent if 13 years or older. We will seek to obtain consent from the student in these instances.

When obtaining consent for students 13 years old or younger, parent(s) will be notified that the school intends 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 if their biometrics had been used.

Students and parents can also object at a later stage to the use of their child's/their biometric data. Should students or parents wish to withdraw their consent, they can do so by writing to the school at enquiries@hampsteadschool.org.uk requesting that the school no longer uses their child's biometric data.

The consent will last for the time period the child attends the school (unless it is withdrawn).

Retention & storage of biometric data

Biometric data will be stored by the school for as long as consent is provided (and not withdrawn). Once a student leaves, the biometric data will be deleted from the school's system on the day they are taken off the school roll. At the point that consent is withdrawn, the school will take steps to delete their biometric data from the system and no later than the day they are taken off the school roll.

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.

Other relevant policies and information

[Hampstead School Data Protection Policy](#)

ICO guide to data protection and special category data:

[Guide to Data Protection | ICO](#)

[What is special category data? | ICO](#)

Document Control

The policy was last reviewed and agreed by Governors Personnel & Safeguarding Committee on [18 January 2022]. It will be reviewed on an annual basis. It is due to be reviewed again in the academic year 2022/2023

This policy is available on the school's RMStaffShare area and available on request from the Administration Office.