



Protection of Biometric Information



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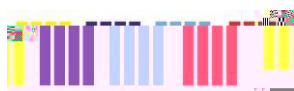
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their fingerprints, facial shape, retina and iris patterns, and hand measurements.

- 3.3 Consent: GDPR requires that consent must be freely given, that the academy must keep a record to demonstrate consent; be able to display prominence and clarity of consent requests; and advise the right to withdraw consent easily and at any time.
- 3.4 Data controller: Under data protection law, the Trust is the data controller for all biometric information held by the academies.
- 3.5 Processing biometric information: Processing biometric information includes obtaining, recording or holding the data or carrying out any operation on the data including disclosing it, deleting it, organising it or altering it. An automated biometric recognition system processes data when:

- @Recording student biometric information, e.g. taking measurements from a fingerprint via a fingerprint scanner.

- @Storing student biometric information on a database.

- @Using student biometric information as part of an electronic process, e.g. by comparing it with biometric information stored on a database to identify or recognise students.

- 3.6 Special category data: Personal data which the GDPR says is more sensitive, and so needs more protection² where biometric information is used for identification purposes, it is considered special category data.

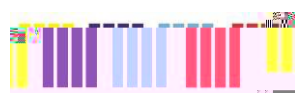
4 Roles and responsibilities

- 4.1 The TU X Board of Directors are responsible for approving this policy.
- 4.2 Academy Principals are responsible for ensuring the provisions in this policy are implemented consistently.
- 4.3 The TU X Data Protection Officer (DPO) is responsible for;

- @Monitoring the academy's compliance with data protection legislation in relation to the use of biometric information.

- @Advising on when it is necessary to undertake a data protection impact assessment (DPIA) L Q U H O D W L R Q W R W K H D F D G H P \ . V system(s).

- @Being the first point of contact for the Information Commissioners Office (ICO).





5 Data protection principles

5.1 The academy processes all personal data , including biometric information , in





8 Student consent

- 8.1 Consent for the processing of biometric information of children under the age of 18 is not imposed by the Data Protection Act 2018 or the GDPR. Instead, the consent requirements for biometric information is imposed by section 26 of the Protection of Freedoms Act 2012.
- 8.2 In line with both the Protection of Freedoms Act 2012 and GDPR for student V · L Q Year 9 or above, the academy will request consent from the student as well as





voluntary organisation will be notified, and their written consent obtained.

@If the above does not apply, then notification will be sent to all those caring for the student and written consent will be obtained from at least one carer before the student is processed.

8.9 The academy will not process the biometric information of a student under the age of 18 in the following circumstances:

@The student (verbally or non-verbally) objects or refuses to participate in the processing of their biometric information

@No parent or carer has consented in writing to the processing.

@A parent or carer of the student has objected in writing to such processing, even if another parent has given written consent.

8.10 Parents and student may withdraw their consent at any time. Where this happens, any biometric information relating to the student that has already been captured must be deleted.

8.11 If a student objects or refuses to participate, or to continue to participate, in activities that involve the processing of their biometric information, the academy will ensure that the student's biometric information is not taken or used as part of a biometric recognition system, irrespective of any consent given by the student or parent(s).

8.12 Consent is considered valid for the duration of a student's enrolment at the academy unless consent is withdrawn by the student or parent.

9 Staff consent

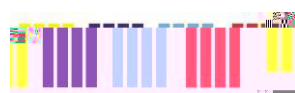
9.1 Where consent will be obtained from them before they use the system(s).

9.2 Staff and other adults can object to taking part in the system(s) and can withdraw their consent at any time. This must be in writing. Where this happens, any biometric information relating to the individual that has already been captured must be deleted.

9.3 For staff, consent is considered valid for the duration of employment, unless consent is withdrawn.

10 Alternative arrangements

10.1 Parents, student





- 10.2 Where an individual objects to the use of a biometric system(s), reasonable alternative arrangements will be provided that allow the individual to access the relevant service, e.g. where a biometric system uses a pre-programmed card, unique number or other suitable means determined by the academy.
- 10.3 Alternative arrangements will not put the individual at any disadvantage or create difficulty in accessing the relevant service or result in any additional burden being placed on the individual (and the student relevant).



