

Porthcawl Comprehensive School

Biometrics Policy



Approved by: Full Governing Body

Date: 13th May 2024

Biometrics Policy

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.

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 additional protection as this type of data could create more significant risks to a person's fundamental rights and freedoms.

This policy complies with The Protection of Freedoms Act 2012 (sections 26 to 28), the Data Protection Act 2018 and the UK GDPR.

Porthcawl Comprehensive School has carried out a Data Protection Impact Assessment with a view to evaluating whether the use of biometric data is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the Data Protection Impact Assessment has informed the school's use of biometrics and the contents of this policy.

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.

The Legal Requirements under UK GDPR

'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.

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 rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained using the providers consent form.

Porthcawl Comprehensive School process biometric data as an aim to make significant improvements to its systems. For example, our canteen and lunch facilities. This is to ensure efficiency, to do away with the need for swipe cards and cash being used and to safeguard the children. E.g. a biometric payment system.

Consent and Withdrawal of Consent

Porthcawl Comprehensive School will not process biometric information without the relevant consent.

Consent for pupils

When obtaining consent for pupils, both parents/carers will be notified that Porthcawl Comprehensive School intend to use and process their child's biometric information. The School only require written consent from one parent/carer (in accordance with the Protection of Freedoms Act 2012), provided no parent/carer objects to the processing.

If a parent/carer objects to the processing, then Porthcawl Comprehensive School will not be permitted to use that child's biometric data and alternatives will be provided. For example, a unique code will be provided for the purchase of food via the school's cashless system to replace a biometric system.

The child may also object to the processing of their biometric data. If a child objects, Porthcawl Comprehensive School will not process or continue to process their biometric data, irrespective of whether consent has been provided by the parent/carer(s).

Where there is an objection, Porthcawl Comprehensive School will provide reasonable alternatives which will allow the child to access the same facilities that they would have had access to, had their biometrics been used.

Pupils and parents/carers can also object at a later stage to the use of their child's/their biometric data. Should a parent/carer wish to withdraw their consent, they can do so by writing to the school at info@porthcawlschool.co.uk requesting that the school no longer use their child's biometric data.

Pupils who wish for Porthcawl Comprehensive School to stop using their biometric data do not have to put this in writing but should let their Head of Year know.

The consent will last for the time period that your child attends Porthcawl Comprehensive School (unless it is withdrawn).

Consent for staff

Porthcawl Comprehensive School will seek consent of staff before processing their biometric data. If the staff member objects, the school will not process or continue to process the biometric data and will provide reasonable alternatives. Staff who wish for the

School to stop using their biometric data should do so by writing to the Headteacher via: info@porthcawlschool.co.uk

The consent will last for the time period that the staff member remains employed by the School (unless it is withdrawn).

Retention of Biometric Data

Biometric data will be stored by Porthcawl Comprehensive School for as long as consent is provided (and not withdrawn).

Once a pupil or staff member leaves, the biometric data will be deleted from the school's system no later than 72 hours.

Storage of Biometric Data

At the point that consent is withdrawn, Porthcawl Comprehensive School will take steps to delete their biometric data from the system and no later than 72 hours.

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.

At Porthcawl Comprehensive School biometric data is used for the sole purpose of its cashless catering system.