



Carlton Academy Trust Protection of Biometric Information Policy

Ratified by Trust Board:	Sept 2020
Signed on behalf of trustees:	R Butterfield
Signed by CEO:	A Kneeshaw
Next Review Date:	Sept 2021

Policy Statement

Carlton Academy Trust is committed to protecting the personal data of all its students and staff, including any biometric data. Currently we do not collect biometric data, but if the trust were to use these systems it would be collected in accordance with relevant legislation and guidance to ensure the data and the rights of individuals are protected.

Definitions

Biometric Data

Biometric data is information about an individual's physical or behavioural characteristics that can be used to identify that person. This can include fingerprints, facial shape, retina and iris patterns, and hand measurements. The Information Commissioner's Office (ICO) considers all biometric information to be personal data as defined by the General Data Protection Regulation 2018 and stipulates that it must be obtained, used and stored in accordance with its requirements.

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. Information from the individual is then compared with biometric information stored in the system to see if there is a match in order to recognise or identify the individual.

Data Processing

Data processing includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including 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
- Using stored 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.

Relevant Legislation

Schools that use pupils' 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 \(EU\) 2016/679 \(GDPR\)](#)

Where the data is to be used as part of an automated biometric recognition system (see below), schools must also comply with the additional requirements in sections 26 to 28 of the [Protection of Freedoms Act 2012](#).

Consent

Schools must ensure that each parent/carer is notified of the school's intention to use biometric systems.

The General Data Protection Act 2018 gives children rights over their own data when they are considered to have adequate capacity to understand, which they consider to be 13 years of age. Carlton Academy Trust will seek parental consent for all children under this age or those at or above that age not considered to have the capacity to provide informed consent. In relation to this, Carlton Academy Trust will seek written parental consent for all students up to and including year 8. Student Consent will be sought for years 9 and above.

Where parental consent is required, it must be obtained in writing. The school must not process data where one parent refuses consent, even when another has provided consent, or when the student refuses consent. In these instances, schools must provide reasonable alternative means of accessing services for those students who will not be using biometric systems.

Length of Consent

Consent is valid until it is withdrawn by a parent/carer or student objecting to the continued processing of their data. A parent/carer must log their objection in writing, but this requirement does not apply to students who can also report their concerns verbally. When the student leaves the school, their biometric data will be securely removed from the academy's biometric recognition system.

Biometric Consent Form – (Parent/Carer)

Student name:

Please sign below if you consent to Carlton Academy Trust taking and using information from your son/daughter’s fingerprint as part of an automated biometric recognition system. This biometric information will be used by the trust for the purpose of

In signing this form, you are authorising the trust to use your son/daughter’s biometric information for this purpose until he/she either leaves the school or ceases 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 Head of School. Once your son/daughter ceases to use the biometric recognition system, his/her biometric information will be securely deleted by the trust.

Parent consent:

Having read the above guidance information, I give consent to information from the fingerprint of my son/daughter being taken and used by the trust for use as part of an automated biometric recognition system for the purpose of

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

Parent Name:

Signature:

Date:

Biometric Consent Form – (Student)

Student name:

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

In signing this form, you are authorising the trust to use your biometric information for this purpose until you either leave the school or you 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 Head of School. Once you cease to use the biometric recognition system, your biometric information will be securely deleted by the school.

Student consent:

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

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

Student Name:

Signature:

Date:

Biometric Consent Form – (Staff)

Name:

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

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

Staff consent:

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

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

Name:

Signature:

Date: