



Biometric Data Policy

PURPOSE

This is the Biometric Data Policy of the Ark Schools and is published in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) and sets how biometric data will be used by our schools.

Date of last review:	April 2024	Author:	Data Protection Officer
Date of next review:	April 2027	Owner:	Director of Risk and Corporate Governance
Type of policy:	<input checked="" type="checkbox"/> Network-wide <input type="checkbox"/> Tailored by school	Approval:	Management Team
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POSITIONING WITHIN ARK OPERATIONAL MODEL

Component	Element
<input type="checkbox"/> Strategic Leadership & Planning <input checked="" type="checkbox"/> Monitoring, Reporting & Data <input checked="" type="checkbox"/> Governance & Accountabilities <input type="checkbox"/> Teaching & Learning <input type="checkbox"/> Curriculum & Assessment <input type="checkbox"/> Culture, Ethos & Wellbeing <input type="checkbox"/> Pathways & Enrichment <input type="checkbox"/> Parents & Community <input type="checkbox"/> Finance, IT & Estates <input type="checkbox"/> Our People	Data Protection

Contents

Introduction..... 3

What is Biometric Data? 3

How it will be used 3

Consent 3

Further information..... 4

Contact..... 4

Appendix 1: Consent form..... 5

Appendix 2: Consent form Year 9 and above7

Introduction

Biometric data is always considered personal data and the use of biometric data under the UK GDPR and the Data Protection Act needs added protection and consideration when being processed. Processing biometric data involves a system automatically recognising an individual based on their biological (fingerprint) or behavioural characteristics and can be used to allow access to systems whilst improving the security, convenience, and efficiency of these interactions.

This Policy should be read in conjunction with Ark's Data Protection Policy.

What is Biometric Data?

Biometric data is any information about a person's physical or behavioural characteristics that can be used to identify them, for example, someone's fingerprint.

The UK GDPR defines biometric data in Article 4(14) as:

“biometric data’ means personal data resulting from specific technical processing relating to the physical, physiological, or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data (fingerprint)”.

How it will be used

Biometric information may be used for a range of applications and services like to provide students with access to cashless catering, library software, print and cost control, access control and registration systems.

Currently our schools only use student's fingerprints as part of an automated biometric recognition system. This system takes a measurements of the person's thumb print and converts these measurements into a unique ID to be stored on the system. The unique ID (the measurements taking from the thumb print) is what will be used to grant students access to the above systems. No image taken of student thumb prints are stored within the system.

Consent

The Trust must seek specific consent from a parent, student, member of staff or a volunteer, including a Trust Member(s), if we would like to process and use biometric data.

The UK GDPR singles out specific types of personal data as likely to be more sensitive and requires organisations to give them extra protection when processing this type of information. Biometric data used for identification purposes falls within this scope as it relates to an identified or identifiable individual and so we must find a 'condition for processing' in order to use this data.

For the processing of biometric or thumb print data, we use explicit consent as described in Article 9(2)(a) of the UK GDPR.

You do not need to consent to school using your biometric data to provide access to the above listed systems. If you decide not to consent to us using biometric data, a PIN code will be issued which they will need to remember and keep secure at all times.

You can also withdraw your consent at any time by contacting the school or by emailing Ark's Data Protection Officer using dataprotection@arkonline.org

Biometric data is only used in our secondary schools and any student in year 9 and above will also need to provide their consent to allow school to use their biometric data. A student may object or refuse to participate (or to continue to participate) to the schools' use of their biometric data, and this objection or refusal overrides any parental consent previously provided.

If consent is refused the school will ensure the student's biometric data is not taken or used as part of a biometric recognition system. The school will also ensure the disposal of any biometric data following their withdrawal of consent.

Further information

“Protection of children's biometric information in schools” guidance for schools, sixth-form colleges, 16 to 19 academies and further education institutions wishing to use automated biometric recognition systems.”

<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools>

Contact

Concerns, questions, or complaints in relation to this policy can be sent to the Ark's Data Protection Officer using dataprotection@arkonline.org.

You can also find more information about how the trust processes personal data by reading our Data Protection policy which can be found [here](#).

If you are not satisfied with our response to your concern or if we have not been able to resolve your complaint, you can also contact the Information Commissioner's Office, who will investigate the case at their discretion by:

Visiting: www.ico.org.uk/foicomplaints

Post addressed to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5A,

Telephone: 0303 123 1113

Appendix 1: Consent form

Who should complete this form?

This form should be completed by parents to give their consent for their child's biometric to be used within school. For students in Year 9 and above you will also need to also provide your consent for school to use your biometric data (please see appendix 2).

What is biometric data and why do we use it?

Biometrics are **biological measurements — or physical characteristics — that can be used to identify individuals**. For example, a fingerprint, facial recognition, and retina scans are all forms of biometric technology.

Biometric data is used within school to provide students with access to cashless catering, library software, print and cost control, access control and registration systems. The biometric data used by [SCHOOL NAME] will be a fingerprint and will give students access to the above systems.

This data is collected by scanning each pupil's thumb when they join to capture tiny measurements which are processed into a unique, encrypted identity code. This unique ID is not readable by any staff member and is kept secure within the [COMPANY NAME] system at all times.

The Purpose of this Consent Form

Biometric data is a special category of data, and we are required under the Data Protection Act (2018) and the UK General Data Protection Regulation (UK GDPR) to seek your consent before processing or using it.

You do not need to consent to school using your biometric data to provide access to the above listed systems. If you decide not to consent to us using biometric data, a PIN code will be issued which your child will need to remember and keep secure at all times.

You can also withdraw your consent at any time by contacting the school on [PHONE] or by using [EMAIL].

How long is this data kept for?

This data will be kept and used as long as your child remains enrolled at [SCHOOL NAME] and consent has been provided. Once your child ceases to use the biometric recognition system, their biometric data will be securely deleted.

Contact Us

If you have any questions about this form or the use of biometric data at [SCHOOL NAME], you can contact the school's data protection lead by phone [NUMBER] or by email [EMAIL] or Ark's Data Protection Officer using dataprotection@arkonline.org.

FOR STUDENTS IN YEAR 9 AND ABOVE, CONSENT IS REQUIRED FROM BOTH PARENT AND STUDENT. STUDENTS IN YEAR 9 AND ABOVE SHOULD COMPLETE THE ADDITIONAL CONSENT FORM ON PAGE 3.

Parental Consent Form for the use of Biometric Data for Students

I/ We give consent to

OR

I/ We do not give consent to

[SCHOOL NAME] processing the biometric data (encrypted fingerprint identity code only) of my child for use as part of an automated biometric recognition system for administration of school meals and other canteen services.

Pupil Name: Date of birth:

Signature:

Name of Parent/Carer:

Date:

Please return this form to: [ADDRESS]

In signing this form, you are authorising [SCHOOL NAME] to use your child's biometric data for the purposes described above until they either leave the school or cease to use the system. If you wish to withdraw your consent at any time, you can do so by contacting the school on [PHONE] or by email using [EMAIL].

Appendix 2: Consent form Year 9 and above

Consent Form for the use of Biometric Data for Students in Years 9 and above

Who should complete this form?

Students who are in Year 9 and above only should complete this page of the consent form. Before completing this form, please ensure you have read the information provided on the first page.

If you need help to understand this consent form, you can ask your parents or another adult such as your teacher to help you understand it

Having read the guidance provided to me,

I **give** consent to

OR

I **do not** give consent to

[SCHOOL NAME] processing my biometric data (encrypted fingerprint identity code only) for use as part of an automated biometric recognition system for administration of school meals and other canteen services.

Name of Pupil:

Signature:

Date:

Please return this form to: [ADDRESS]

In signing this form, you are authorising [SCHOOL NAME] to use your biometric data for the purposes described above until you either leave the school or cease to use the system. If you wish to withdraw your consent at any time, you can do so by contacting the school on [PHONE] or by email using [EMAIL].