



Protection of Biometric Data Policy

Policy Code:	IT6
Policy Start Date:	April 2023
Policy Review Date:	April 2026

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Statement of intent

Community Inclusive Trust is committed to protecting the personal data of all its pupils and staff; this includes any biometric data we collect and process.

We collect and process biometric data in accordance with relevant legislation and guidance to ensure the data and the rights of individuals are protected. We will treat the data collected with appropriate care.

This policy outlines the procedure the Trust follows when collecting and processing biometric data.

The pupil (verbally or non-verbally) objects or refuses to participate in the processing of their biometric data
No parent or carer has consented in writing to the processing
A parent has objected in writing to such processing, even if another parent has given written consent

Parents will be informed that they can object or refuse to allow their child to use biometric systems or withdraw their consent at any time, and that if they do this, the Trust will provide them with an alternative method of accessing the relevant services. Pupils will be informed that they can object or refuse to allow their biometric data to be collected and used via letter. The steps taken by the Trust to inform pupils will take account of their age and level of understanding. Parents will also be informed of their rights to object to the processing of their child's biometric data.

Where a pupil or their parents object, any biometric data relating to the pupil that has already been captured will be deleted. If a pupil objects or refuses to participate, or to continue to participate, in activities that involve the processing of their biometric data, the Trust will provide them with an alternative method of accessing the relevant services. Parents will also be informed of their rights to object to the processing of their child's biometric data.

Where a pupil or their parents object, any biometric data relating to the individual that has already been captured will be deleted. Staff and other adults can object to taking part in the Trust's activities that involve the processing of their biometric data. Where this happens, any biometric data relating to the individual that has already been captured will be deleted.

Alternative arrangements will be provided to any individual that does not consent to take part in the Trust's activities that involve the processing of their biometric data.

7. Alternative arrangements

There are appropriate and robust security measures in place to protect the biometric data held by the Trust. Any breach to c@ Vi~•œ àq { ^dæ•^•e{ • , q| à^ { ææ^â q accordance with the Data and Cyber-security Breach Prevention and Management Plan.

10. Monitoring and review

The Trust Board will review this policy on an three year basis.

Any changes made to this policy will be communicated to all staff, parents and pupils.

Parental notification and consent form for the use of biometric data

[The following is suggested text for a notification letter and consent form to parents. You should adapt this text in line with your Trust's specific biometric systems.]

Address line one
Address line two
Town
County
Postcode
Date

RE: Notification of intention to process pupils' biometric information and consent form

Dear parent,

I am writing to inform you that we are introducing an automated (i.e. electronically operated) recognition system. The purpose of this system is to **[Specify what the purpose of the system is, e.g. to facilitate catering transactions to be made using pupils' fingerprints instead of by using cash.]**

We would like to collect and use the following biometric information from your child:

Biometric information and how it will be used

Biometric information can be used to identify them, e.g. their fingerprint. The school would like to collect and use the following biometric information from your child:

[Specify the biometric information you want to collect and process.]

The school would like to use this information for the purpose of providing your child with **[Specify the purpose of using the information, e.g. so the child can pay for their Trust meal using their fingerprint.]**

The information will be used as part of an automated biometric recognition system. This system will take measurements of the biometric information specified above and convert these measurements into a template to be stored on the system. An image of your child's biometric information

