



## Biometrics Policy

### Introduction

This policy has been drafted in accordance with the following key laws, guidance and regulations:

- UK General Data Protection Regulations ("UK GDPR")
- Data Protection Act 2018
- The Protection of Freedom Act 2012 (sections 26 to 28)

Key Related Policies:

- Information Security Policy
- Data Protection Policy
- Data Breach Policy
- Visitors Policy
- All applicable Privacy Notices
- Acceptable Use Policies
- Pupil and Parent Tablet Loan Agreements

### 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 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.

'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, deleting, organising or altering it.

### Consent to the Use of Biometric Data and Withdrawal of Consent

Pupils and staff using School-owned electronic devices (such as tablets, laptops and mobile phones) have the option to use biometric data in the form of fingerprints and facial recognition, to assist with signing-in to devices more efficiently and securely.

By enabling these settings, staff and pupils' consent to storing their biometric data on the device. This data is used only to assure their identity on the device, it is encrypted and cannot be extracted. The School does not have access to this data. Staff and pupils can choose to remove their biometric data from the device at any time by disabling the settings on the device and opting to use a PIN code instead.

If the School extends the use of biometric data in the near future, it will rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data) for processing biometric data, and this policy will be updated accordingly.