Waterton
Academy Trust

Protection of Biometric Information of Children in Schools Policy

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Contents

Introduction

Waterton Academy Trust recognises the sensitivity of biometric data as special category data and is committed to ensuring its secure and lawful processing. This policy outlines the principles and procedures to be followed by all staff, including temporary, voluntary, and agency staff, governors, trustees, volunteers, visitors on work experience placements, and parent helpers/PTA members.

Aims

This policy outlines the responsibilities and processes for the use and protection of biometric information in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Protection of Freedoms Act 2012.

Key Definitions

Biometric Data: Personal data derived from physical, physiological, or behavioural characteristics enabling unique identification, such as fingerprints, facial recognition, or iris patterns.

Automated Biometric Recognition System: Technology that electronically collects, processes, and uses biometric data for identification or verification.

Processing: Any operation performed on personal data, such as collecting, recording, storing, using, or deleting it.

Legal Framework

This policy is based on the following legislation:

- The UK GDPR and Data Protection Act 2018: Governing lawful processing of biometric data.
- The Protection of Freedoms Act 2012: Establishing specific conditions for obtaining and using biometric information in schools.

Responsibilities

1. **Data Controller**: Waterton Academy Trust is the Data Controller and ensures compliance with data protection laws.
2. **Data Processors**: Third-party providers handling biometric data must adhere to the trust's instructions and relevant legislation.
3. **Data Protection Officer (DPO)**: Ensures policies and practices align with regulatory requirements and manages Data Protection Impact Assessments (DPIAs).

Consent

1. Parental Notification and Consent:

- Consent must be obtained from at least one parent/legal guardian before processing a child's biometric information.
- Parents are informed of the type of biometric data collected, its purpose, and how it will be used.

2. Child's Right to Object:
   - A child can refuse or withdraw their participation at any time, overriding any parental consent.
   - The refusal does not need to be in writing.

3. Withdrawing Consent:
   - Parents or children may withdraw consent at any time in writing. Biometric data will be securely deleted upon withdrawal.

Alternative Arrangements

The trust will provide reasonable alternatives for children who do not participate in biometric systems to ensure equal access to services, without additional burden on the child or parent.

Data Protection Impact Assessment (DPIA)

A DPIA will be conducted before implementing any new biometric system or significant changes to existing ones to assess risks and ensure compliance.

Data Security

1. Storage and Retention:
   - Biometric data is securely stored and only retained as long as necessary.
   - Data will be securely deleted when a child leaves the school or ceases to use the system.

2. Third-Party Access:
   - Data will not be shared with third parties unless necessary for the functioning of the biometric system, and only with proper safeguards in place.

Notification Process

Parents will receive a written notice explaining:

- The purpose and use of the biometric system.
- Their rights and the child's rights concerning consent.
- The process for alternative arrangements if they do not consent.

Data Protection

All personal data must be processed in line with the Trust's Data Protection Policy, ensuring information is kept safe and secure. Staff should understand the legal

framework governing data sharing and be confident in the conditions that allow for the sharing of sensitive personal data.

Policy Review

This policy will be reviewed every two years by the Trust.

Dissemination

The policy will be made available to all staff and parents via the school website and other appropriate channels.

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