



ASPIRATIONS

Park Academy West London

1. BIOMETRICS POLICY

Version control	
Biometrics Policy [2022-09-01]	Reviewed and updated to reflect reference to UK GDPR.
Biometrics Policy [2021-04-01]	Reviewed and updated previous version to align with new DPO appointment.

Date of next review:	September 2024	Owner:	Director of Estates
Type of policy:	Trust	Approving Body:	Executive Operational Board

Biometrics Policy

1. Introduction

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 General Data Protection Regulation (UK GDPR). This means the data is more sensitive and requires more protection and this type of data could create more significant risks to a person's fundamental rights and freedoms.

This policy complies with The Protection of Freedoms Act 2012 (sections 26 to 28), the Data Protection Act 2018 and the UK GDPR.

What is an 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' (i.e. electronically). Information from the individual is automatically compared with biometric information stored in the system to see if there is a match in order to recognise or identify the individual.

2. The legal requirements under UK GDPR

'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 it, deleting it, organising it or altering it.

As biometric data is special category data in order to lawfully process this data, the Academy must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the

Academy relies on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained using the providers consent form.

The Academy processes biometric data with the aim of making significant improvements to our canteen and lunch facilities. This is to do away with the need for cash being used, to safeguard the children.

3. Consent and Withdrawal of consent

The Academy will not process biometric information without the relevant consent.

Consent for pupils

When obtaining consent for pupils, both parents will be notified that the Academy intend to use and process their child's biometric information. The Academy only require written consent from one parent (in accordance with the Protection of Freedoms Act 2012), provided no parent objects to the processing.

If a parent objects to the processing, then the Academy will not be permitted to use that child's biometric data and alternatives will be provided.

The child may also object to the processing of their biometric data. If a child objects, the Academy will not process or continue to process their biometric data, irrespective of whether consent has been provided by the parent(s).

Where there is an objection, the Academy will provide reasonable alternatives which will allow the child to access the same facilities that they would have had access to had their biometrics been used.

Pupils and parents can also object at a later stage to the use of their child's/their biometric data. Should a parent wish to withdraw their consent, they can do so by writing to the Academy at info@park-aspirations.org requesting that the Academy no longer use their child's biometric data.

Pupils who wish for the Academy to stop using their biometric data do not have to put this in writing but should notify the Vice Principal.

The consent will last for the time period that the pupil attends the Academy (unless it is withdrawn).

Consent for staff

The Academy will seek consent of staff before processing their biometric data. If the staff member objects, the Academy will not process or continue to process the biometric data and will provide reasonable alternatives. Staff who wish for the Academy to stop using their biometric data should do so by writing to the Vice Principal.

The consent will last for the time period that the staff member remains employed by the Academy (unless it is withdrawn).

4. Retention of Biometric Data

Biometric data will be stored by the Academy for as long as consent is provided (and not withdrawn).

Once a pupil or staff member leaves the Academy, the biometric data will be deleted from the Academy's system no later than 72 hours.

At the point that consent is withdrawn, the Academy will take steps to delete the individual's biometric data from the system and no later than 72 hours.

5. Storage of Biometric Data

Biometric data will be kept securely and systems will be put in place to prevent any unauthorised or unlawful access/use.

The biometric data is only used for the purposes for which it was obtained and such data will not be unlawfully disclosed to third parties.

6. Monitoring

The Academy will monitor the effectiveness of this and all of its policies and procedures and conduct a full review and update as appropriate. Normally this will be on a two year cycle but, where necessary, interim reviews will be undertaken.

The monitoring and review will include looking at how policies and procedures are working in practice to reduce the risks posed to the Academy.