



Bennett Memorial Diocesan School

Biometric Data Policy

Approval Arrangements

All statutory policies in the Trust are ultimately the responsibility of the Trust Board. To enable it to discharge this responsibility appropriately and in collaboration with the constituent schools, the Trust Board will either

1. set a full Trust wide policy which applies in the same way to all schools
2. require individual schools to set a policy (in most cases with Trust-provided guidance) appropriate to the needs and circumstances of an individual school

This is a Level 2 Policy against the Trust Governance Plan.

Review Body:	Headteacher and Data Protection Officer
Approved:	05 October 2023
Next review:	October 2026
Review Period:	3 years

This policy was approved by the Headteacher and Data Protection Officer for implementation on the date above and supersedes any previous biometric data policy.

Context

The school wishes to use information about its students as part of an automated (i.e. electronically-operated) recognition system. Specifically, we use a fingerprint recognition scheme for the purchase of school meals. This information from students we wish to use is referred to as 'biometric information' and as such we are required to have a policy in place for the protection of biometric information of children in schools and colleges.

We have opted for this system for several reasons:

- It is secure – you cannot lose your finger unlike a debit card or cash
- It is non-transferable – no student can be pressurised into buying anything for anyone else because you cannot 'lend' your finger to anyone else
- There is no temptation for students to spend the money on other things in or outside school
- It is fast, certainly much quicker than students paying by cash, and faster than most debit card readers, and thus reduces queuing times for students
- It does not infringe privacy, in our view, because the fingerprint is not stored, only a digital code derived from the fingerprint scan. It is not possible for a fingerprint to be reconstructed from the code

Guidance

This policy is based on the non-statutory advice from the DfE on Protection of biometric information of children in schools and colleges at time of writing (20 July 2022).

Key Points

- Schools and colleges that use pupils' biometric data must treat the data collected with appropriate care and must comply with the data protection principles as set out in the Data Protection Act 1998.
- Where the data is used as part of an automated biometric recognition system, schools and colleges must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.
- Schools and colleges must ensure that each parent of a child is notified of the school's intention to use the child's biometric data as part of an automated biometric recognition system.¹
- The written consent of at least one parent must be obtained before the data is taken from the child and used. This applies to all pupils in schools and colleges under the age of 18. In no circumstances can a child's biometric data be processed without written consent.
- Schools and colleges must not process the biometric data of a pupil (under 18 years of age) where:
 - a) the child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
 - b) no parent has consented in writing to the processing; or
 - c) a parent has objected in writing to such processing, even if another parent has given written consent.
- Schools and colleges must provide reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system.

Full guidance can be found [here](#)

Parents are able to withdraw their consent, in writing, at any time by emailing the school at enquiries@bennett.kent.sch.uk

¹ Schools and colleges will not need to notify a particular parent or seek his or her consent if the school is satisfied that it is not reasonably practicable for a particular parent to be notified or for his or her consent to be obtained.