

Protection of Biometric Data of Children Policy

Bolder Academy

MacFarlane Lane, Isleworth, Middlesex TW7 5DB

Registered in England and Wales No: 08932893

Protection of Biometric Data of Children in Academies Policy May 2020

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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 (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 GDPR.

The Academy has carried out a data protection impact assessment with a view to evaluating whether use of biometric data is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the Academy's use of biometrics and the contents of this policy.

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.

The legal requirements under 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 rely on explicit consent (which satisfies the fair processing

conditions for personal data and special category data). Consent is obtained via Bolder's Admissions form which requests specific Biometrics consent.

The Academy processes biometric data to deliver the canteen lunch and breaktime service, ensure efficiency, and do away with the need for swipe cards and cash being used by students within the Academy, to safeguard the children.

Consent and Withdrawal of consent.

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

Consent for students

When obtaining consent for students, 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.

Students 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 head@bolderacademy requesting that the Academy no longer use their child's biometric data.

The consent will last for the time period that your child 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

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the Academy to stop using their biometric data should do so by writing to office@bolderacademy.

The consent will last for the time period that the staff member remains employed by the Academy (unless it is withdrawn).

A copy of the Staff consent form can be found in Appendix A of this policy.

Retention of Biometric Data

Biometric data will be stored by the Academy for as long as consent is provided (and not withdrawn).

Once a student [or staff member] leaves, 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 their biometric data from the system and no later than 72 hours.

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.

Appendix 1: Biometric Consent form (Staff)

Please sign below if you consent to the Academy taking and using your fingerprint information as part of an automated biometric recognition system. This biometric information will be used by the Academy to deliver the canteen lunch and breaktime service, to ensure efficiency, and do away with the need for swipe cards and cash being used by staff within the Academy.

In signing this form, you are authorising the Academy to use your biometric information for this purpose until you either leave the Academy or cease to use the system.

If you wish to withdraw your consent at any time, this must be done so in writing and sent to Suelin Billingham (SBillingham@bolderacademy.co.uk).

Having read the above guidance information, I give consent to information from my fingerprint being taken and used by the Academy for use as part of an automated biometric recognition system.

I understand that I can withdraw this consent at any time in writing.

Print Name:

Signature:

Date:



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