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Europa School UK Protection of Biometric Information of Children in Schools Policy

Version and Date		Action/Notes
V1	July 2022	First whole school curriculum policy
	July 2026	reviewed
Review Date July 2030		

Key Points

Schools that use students' biometric data must treat the data collected with appropriate care and must comply with the data protection principles as set out in the General Data Protection Regulation 2018. Where the data is to be used as part of an automated biometric recognition system, schools must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.

Schools must ensure that the parent/carer of each child is informed of the intention to use the child's biometric data as part of an automated biometric recognition system. The consent of the parent/carer or the child, where the child is deemed to have the capacity to consent, must be obtained before the data is taken from the child and used (i.e. 'processed'). In no circumstances can a child's biometric data be processed without written consent.

Schools must not process the biometric data of a student where:

- a) The child (whether verbally or nonverbally) objects or refuses to participate in the processing of their biometric data;
- b) A parent or student has not consented to the processing;
- or c) A parent or student has objected in writing to such processing, even if another parent has given written consent.

Schools must provide reasonable alternative means of accessing the services to those students who will not be using an automated biometric recognition system.

Biometric Data and Processing

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. The Information Commissioner considers all biometric information to be personal data as defined by the General Data Protection Regulation; this means that it must be obtained, used and stored in accordance with that Regulation. The Protection of Freedoms Act 2012 includes provisions which relate to the use of biometric data in schools and colleges when used as part of an automated biometric recognition system. These provisions are in addition to the requirements of the General Data Protection Regulation.

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..

'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. An automated biometric recognition system processes data when: a. recording students' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner; b. storing students' biometric information on a database system; or c. using that data as part of an electronic process, for example, by comparing it with biometric information stored on a database in order to identify or recognise students.

The Data Protection Act gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around age 13. For this reason, for most children in a secondary school, it will normally be up to the individual child to decide whether or not to provide biometric data. Where Europa School UK considers that the child does not have the capacity or they are under the age of 13, parents/carers will be asked to provide consent. Schools and colleges will be required to notify each parent of a child whose biometric information they wish to collect/use. If either parent objects in writing, then the school or college will not be permitted to take or use that child's biometric data.

The original written consent is valid until such time as it is withdrawn. However, it can be overridden, at any time either parent or the child themselves objects to the processing (subject to the parent's objection being in writing). When the student leaves the academy, their biometric data will be securely removed from the academy's biometric recognition system.

Europa School UK's cashless catering system allows for an alternative to biometric scanning and any student objecting to the processing of their biometric data will be issued with a PIN code.