

	<b>Eastern Multi-Academy Trust</b> Empower - Motivate - Aspire - Transform
<b>Policy</b>	Biometric Data Policy
Author	David Cousins, Chief Finance Officer Rebecca Schrooder, Operations Manager
Date of Approval	July 2022
Approved by	Audit Committee
Review date:	July 2025

**This is the Biometric Data Policy of the Eastern Multi Academy Trust (the Trust) and is published in accordance with the Protection of Freedoms Act 2012 and the Data Protection Act 2018 (DPA) and sets how such data will be used by Eastern Multi-Academy Trust.**

### **Biometric information**

Biometric information is information about a child’s physical or behavioural characteristics that can be used to identify them, for example, information from their fingerprint. It is defined in the Data Protection Act as “personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of an individual, which allows or confirms the unique identification of that individual, such as facial images or dactyloscopic data.”

### **How it will be used**

Biometric information may be used for a range of applications and services including but not limited to access and exit for the Trust’s premises, access to services such as library or paying for meals in the canteen, attendance records and computer services.

Currently the Trust only uses fingerprint information as part of an automated biometric recognition system. This system takes measurements of a child’s fingerprints and converts these measurements into a template to be stored on the system. An image of the fingerprint is not stored. The template (i.e. measurements taking from the fingerprint) is what will be used to permit access to the service.

### **Consent**

Under the DPA the Trust must seek specific consent from a parent, student or a member of staff or a volunteer, including a Trust Member or Director, if it would be beneficial for the Trust, Trust or the individual to provide such information.

The Protection of Freedoms Act 2012 (sections 26 to 28), places specific requirements on Trusts and colleges when using personal information, such as biometric information, about students for the purposes of an automated biometric recognition system.

The use of the biometric system is by written consent and if consent is not available the Trust will always ensure there is another means of providing access to the application or service.

A student may object or refuse to participate (or to continue to participate) in activities that involve the

processing of their biometric data, and this objection or refusal overrides any parental consent to the processing.

If consent is refused the Trust will ensure that the student's biometric data are not taken/used as part of a biometric recognition system or if taken destroyed following withdrawal of consent.

This Policy should be read in conjunction with the Trust's Data Protection Policy.

### **Further information and guidance**

#### **"Protection of children's biometric information in Trusts**

Guidance for Trusts, sixth-form colleges, 16 to 19 academies and further education institutions wishing to use automated biometric recognition systems."

<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-Trusts>

*For use with Year 7 parents*

**NOTIFICATION OF INTENTION TO PROCESS STUDENTS' BIOMETRIC INFORMATION**

Dear [name of parent/carer]

The Trust wishes to use information about your child as part of an electronically-operated recognition system. This is for the purposes of making purchases in the canteen.

The information from your child that the Trust wishes to use is referred to as 'biometric information'. Under the Protection of Freedoms Act 2012 (sections 26 to 28), the Trust is required to notify each parent and obtain the written consent of at least one parent before being able to use your child's biometric information for an automated system. In handling the data the Trust must comply with the Data Protection Act 2018.

**Biometric information and how it will be used**

Biometric information is information about a child's physical or behavioural characteristics that can be used to identify them, for example, information from their fingerprint. The Trust would like to take and use fingerprint information from your child and use this information for the purpose of providing your him with the ability to make purchases from his pre-paid account in the canteen.

The information will be used as part of an automated biometric recognition system. This system will take measurements of your child's fingerprints and convert these measurements into a template to be stored on the system. An image of the fingerprint is not stored. The template (i.e. measurements taking from your child's fingerprint) is what will be used to permit pay for the purchases.

You should note that the law places specific requirements on Trusts and colleges when using personal information, such as biometric information, about students for the purposes of an automated biometric recognition system.

For example:

- (a) the Trust cannot use the information for any purpose other than those for which it was originally obtained and made known to the parent(s) (i.e. as stated above);
- (b) the Trust must ensure that the information is stored securely;
- (c) the Trust must tell you what it intends to do with the information;
- (d) unless the law allows it, the Trust cannot disclose personal information to another person/body.

**Providing your consent/objecting**

As stated above, in order to be able a student's biometric information, the written consent of at least one parent is required. However, consent given by one parent will be overridden if the other parent objects in writing to the use of the student's biometric information. Similarly, if your son/daughter objects to this, the Trust cannot collect or use the biometric information for inclusion on the automated recognition system.

You can also object to the proposed processing of your child's biometric information at a later stage or withdraw any consent you have previously given. This means that, if you give consent but later change your mind, you can withdraw this consent. Please note that any consent, withdrawal of consent or objection from a parent must be in writing and addressed to:

**[Add appropriate details]**

Even if you have consented, your child can object or refuse at any time to their biometric information being taken or used. The objection does not need to be in writing. We would appreciate it if you could discuss this with your son/daughter and explain that they can object to this if they wish.

The Trust is also happy to answer any questions you or your child may have.

If you do not wish your child's biometric information to be processed by the Trust, or your child objects to such processing, the law says that the Trust must provide reasonable alternative arrangements for them to make canteen purchases and the Trust will do this by providing a swipe card.

If you give consent to the processing of your child's biometric information, please sign, date and return the enclosed consent form to the Trust.

Please note that when your child leaves the Trust or if for some other reason withdraws consent to use the biometric system, their biometric data will be securely deleted.

### **Further information and guidance**

#### **"Protection of children's biometric information in Trusts**

Guidance for Trusts, sixth-form colleges, 16 to 19 academies and further education institutions wishing to use automated biometric recognition systems."

<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-Trusts>

## CONSENT FORM FOR THE USE OF BIOMETRIC INFORMATION FOR CANTEEN PURCHASES

Please complete this form if you consent to the Trust taking and using information from your child's fingerprint as part of an automated biometric recognition system. This biometric information will be used by Eastern Multi-Academy Trust for the purpose of making purchases from their pre-paid canteen account.

In signing this form, you are authorising the Trust to use your child's biometric information for this purpose until he either leaves the Trust or ceases to use the system. If you wish to withdraw your consent at any time, this must be done so in writing and sent to:

**[Add details here]**

Once your child ceases to use the biometric recognition system, their biometric information will be securely deleted by the Trust.

-----  
Please complete section 1 and sign either section 2 or 3

1      Child's Full Name      \_\_\_\_\_  
  
          Form                            \_\_\_\_\_

2      Having read guidance provided to me by Eastern Multi Academy Trust, I give consent to information from the my child's fingerprint being taken and used by Eastern Multi Academy Trust for use as part of an automated biometric recognition system for making purchases from his pre- paid canteen account.

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

Name of Parent/Guardian      \_\_\_\_\_

Signature:                            \_\_\_\_\_

Date:                                    \_\_\_\_\_

3      I would prefer that my child is registered for a swipe card in the canteen.

Name of Parent/Guardian      \_\_\_\_\_

Signature:                            \_\_\_\_\_

Date:                                    \_\_\_\_\_