



# ELMS FARM PRIMARY SCHOOL PUPILS' BIOMETRIC INFORMATION POLICY

**THIS DOCUMENT IS** a statement of the aims, principles and procedures for pupils' biometric policy for Elms Farm Primary School.

**IT WAS DEVELOPED** in July 2021.

**IT WAS APPROVED** by the governing body in September 2021.

**REVIEW:** every two years or in the event of biometric information being collected. **Reviewed September 2023.**

## 1.0 WHAT IS BIOMETRIC DATA?

1.1 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.

1.2 All biometric data is considered to be special category data under the UK 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.

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

## 2.0 WHAT IS AN AUTOMATED BIOMETRIC RECOGNITION SYSTEM?

2.1 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.

## 3.0 THE LEGAL REQUIREMENTS UNDER UK GDPR.

3.1 '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.

3.2 As biometric data is special category data in order to lawfully process this data, the school must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the school rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data).

## 4.0 MONITORING & REVIEW

Elms Farm Primary School do not use systems which collect or use biometric data. Should the use of such data be considered in the future, a review of this policy will be completed.



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**Signed**

**Chair of the Governing Board**

**Date:**

**Review Date:**