



Biometrics Policy

Version: 3.1

Date: 28/11/2024

thesovereigntrust.uk

The Sovereign Trust is a Multi Academy Trust registered in England No. 09666511. Registered Office: Manor Academy Sale, Manor Avenue, Sale M33 5JX




Document Control

Title	Biometrics Policy
Supersedes	Previous Version No.3.0
Owner	CEO
Circulation/Distribution	All
Review Period	Annually

The Sovereign Trust is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with Trust's policy review schedule.

A current version of this document is available to all interested parties [The Sovereign Trust Website](#)

Signature: 

Date: 28.11.24

Version History

Next Review Date		28/11/2025		
Version	Date	Amendments	Author	Status
1.0	06/05/2018	Initial Issue	CEO	Approved
2.0	11/05/2021	Updated references to UK GDPR	CEO	Approved
3.0	03/08/2022	Formatting amendments	CEO	Approved
3.0	28/11/23	No changes	CEO	Approved
3.1	28/11/24	Formatting amendments	CEO	Approved

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 UK General Data Protection Regulation (UK GDPR). This means the data is more sensitive and requires additional protection as 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 UK GDPR.

The Trust has carried out a Data Protection Impact Assessment with a view to evaluating whether the 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 Trust'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 UK 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 Trust must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the Trust rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained using the consent form(s) in the attached appendix.

The Trust may process biometric data as an aim to make significant improvements our canteen and lunch facilities or for pupils to sign in/move around the School. This is to ensure efficiency, to do away with the need for swipe cards and cash being used and to safeguard the children.

Consent and Withdrawal of Consent

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

Consent for pupils

When obtaining consent for pupils, both parents will be notified that the School intend to use and process their child's biometric information. The School 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 School 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 School 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 School 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.

Pupils 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 Trust at admin@thesovereigntrust.uk requesting that the Trust/Academy no longer use their child's biometric data.

Pupils who wish for the Trust/Academy to stop using their biometric data do not have to put this in writing but should let the Head Teacher know.

The consent will last for the time period that your child attends the Trust (unless it is withdrawn).

Consent for staff

The Trust will seek the consent of staff before processing their biometric data. If the staff member objects, the School will not process or continue to process the biometric data and will provide reasonable alternatives. Staff who wish for the School to stop using their biometric data should do so by writing to The HR Manager.

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

Retention of Biometric Data

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

Once a pupil or staff member leaves, the biometric data will be deleted from the School's system no later than 72 hours.

Storage of Biometric Data

At the point that consent is withdrawn, the School will take steps to delete their biometric data from the system and no later than 72 hours.

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 (parent/carer)

Please sign below if you consent to the school taking and using information from your son/daughter's fingerprint as part of an automated biometric recognition system. This biometric information will be used by the school for the purpose of **Nothing at this time, with no current plans to implement**

In signing this form, you are authorising the school to use your son/daughter's biometric information for this purpose until he/she either leaves the school 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 the Head Teacher. Once your son/daughter ceases to use the biometric recognition system, his/her biometric information will be securely deleted by the school no later than 72 hours.

Please note that pupils can object or refuse to allow their biometric data to be taken/used and if they do this, we will provide them with an alternative method of accessing relevant services. This will be discussed with you or your child (depending on their age and their understanding of their data rights) within school. However, we would encourage you to also discuss this with your child at home to ensure that they are aware of their right to refuse or to change their mind at any time.

For further information on the processing of biometric data, please see our Biometrics Policy which is available on the school website.

Parental Consent:

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

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

Parent/carer name:

Signature:

Date:

Name of student:

Please return a copy of this consent form to the school office.

Appendix 2 – Biometric Consent Form (staff)

Please sign below if you consent to the school taking and using your fingerprint information as part of an automated biometric recognition system. This biometric information will be used by the school for the purpose of [Nothing at this time, with no current plans to implement DETAILS – for example to allow them to move freely around the school or for catering].

In signing this form, you are authorising the school to use your biometric information for this purpose until you either leave the school 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 the HR department.

For further information on the processing of biometric data, please see our Biometrics Policy which is available on the school website.

Staff Consent:

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

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

Staff name:

Signature:

Date: