



ROBERT CLACK SCHOOL

BIOMETRIC DATA POLICY

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Controlled Document

Title	Biometric Data Policy
Author	Data Protection Officer
Owner	Headteacher
Document Version	Version 1
Created	August 2026
Approved by	Approved in accordance with the School's governance arrangements
Review Date	August 2029 or earlier where there is a change in the applicable law affecting this Policy Guidance

Version Control:

Version	Date	Author	Description of Change
1	August 2026	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	New Policy

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1. INTRODUCTION

This policy sets out how the School collects, uses, stores and deletes biometric data and biometric information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Protection of Freedoms Act 2012.

Biometric data means personal information about an individual's physical or other characteristics that can be used to identify that person; this can include fingerprints, facial shape, retina and iris patterns and hand measurements.

2. CONSENT

The School takes collection and storage of the data very seriously and abides by the principles of the UK General Data Protection Regulation and the Data Protection Act 2018 and The Protection of Freedoms Act 2012. The School stores all biometric data securely for the purposes of identification only. Biometric data is only processed for the purpose of which it was obtained, and which we have notified parents or legal guardians, and it is not unlawfully disclosed to third parties.

In accordance with The Protection of Freedoms Act 2012, the School notifies all parents and/or legal guardians of its practice in collecting and processing biometric data and obtains written consent from at least one parent and/or legal guardian.

The School will not collect or process biometric data relating to pupils without the written consent requirements set out in the Protection of Freedoms Act 2012 being met. For staff, biometric data will only be processed where explicit consent has been obtained and can be withdrawn at any time.

In accordance with the Protection of Freedoms Act 2012, pupils who are able to understand the nature of the biometric processing have the right to object to the collection or use of their biometric data. Where a pupil objects or refuses to participate, the School will not collect or use that pupil's biometric data, regardless of whether parental consent has been provided.

The School will ensure that staff and pupils and their parents will be informed of the School's intention to process the individual's personal data, this will be carried out through readily available privacy notices.

The School relies on:

- Article 6(1)(a) UK GDPR – Consent; and
- Article 9(2)(a) UK GDPR – Explicit Consent

For the processing of biometric data used for identification purposes.

Parents and staff may withdraw their consent at any time. Where consent is withdrawn, the School will cease processing the biometric data and provide an alternative means of identification. The withdrawal of consent will not affect the lawfulness of processing carried out prior to the withdrawal.

3. THE PURPOSE

The School may use a biometric identification system for cashless catering, library services, printing services or other identification systems approved by the School. Details of the specific biometric processing undertaken by the School will be set out in the School's privacy notices and Data Protection Impact Assessment.

The automated recognition software converts the biometric data (e.g., fingerprint) into a mathematical algorithm. The image itself is then deleted meaning that the information which is stored cannot be used to recreate the original image.

4. ALTERNATE USE TO BIOMETRIC SYSTEM

The School uses an alternative PIN-based identification system. PIN details are stored securely and only for the purpose of facilitating access to the catering system.

5. PRINCIPLES AND ACCOUNTABILITY

- Biometric data will only be processed in line with the requirements.
- The School will implement appropriate technical measures to demonstrate that the biometric data is in line with the GDPR Principles
- The School will ensure the rights and freedom of the individuals are not adversely affected by the processing of any biometric data
- The School's privacy notice will provide clear and transparent details of the use of biometric data
- The School will produce a Data Protection Impact Assessment on the processing of the biometric data and highlight any high or key risks.
- The School does not allow access to this data by anyone for any other means than for the purpose the data was collected.
- Access to biometric data will be restricted to authorised personnel who require access for their duties.

6. DATA RETENTION

The School will not keep the data for longer than necessary in line with the Schools retention and deletion policy. If an individual or parent requests to withdraw their consent of their biometric data, this will be done immediately and removed from the School's system, and a PIN code will be provided.

When a pupil or staff member leave the School, their biometric data will be securely deleted within a reasonable period and in accordance with the School's retention schedule and supplier deletion processes.

7. POLICY REVIEW

The DPO is responsible for monitoring and reviewing this policy. Although this policy is reviewed every three years, changes to legislation, national guidance, codes of practice or advice from the Information Commissioner may trigger interim reviews. The DPO will highlight any significant legislative developments that may require earlier action or updates to this Policy.

The School is aware of the upcoming Data Use and Access Act 2025, and this policy will be reviewed should any changes be brought into force affecting this policy.

8. LINKS WITH OTHER POLICIES

This Biometric Data Policy is linked to the School:

- Data Protection Policy
- Data Protection Impact Assessment Policy
- Freedom of Information Policy
- Security Incident and Data Breach Policy
- Acceptable Use Policy
- Record Retention and Deletion Policy

The Information Commissioner provides a free helpline and a wide range of guidance and resources relating to information rights and data protection. Further information is available from: [Information Commissioner Office \(ICO\)](#)