



CORINIUM
EDUCATION
TRUST

Policy: Protection of Biometric Data

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1. Introduction

- 1.1. The Corinium Education Trust is committed to protecting the personal data of all its pupils and staff, this includes any biometric data we collect and process.
- 1.2. No schools in the Trust currently collect or process biometric data. Only the Trust Lead (CEO) of the Trust can approve the collection and processing of such data.
- 1.3. This policy briefly outlines the procedure that schools within the Trust would need to follow if they were authorised to collect and process biometric data at some stage in the future.
- 1.4. The Trust will follow the DfE's guidance: 'Protection of biometric data of children in schools and colleges, July 2022'.
- 1.5. For the purposes of this policy, Biometric Data is defined as 'personal information about an individual's physical or behavioural characteristics that can be used to identify that person, including their fingerprints, facial shape, retina and iris patterns, and hand measurements.

2. Data protection principles

- 2.1. The Trust processes all personal data, including biometric data, in accordance with the key principles set out in the GDPR i.e. that data is:
 - Processed lawfully, fairly and in a transparent manner;
 - Only collected for specified, explicit and legitimate purposes, and not further processed in a manner that is incompatible with those purposes;
 - Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - Accurate and, where necessary, kept up-to-date, and that reasonable steps are taken to ensure inaccurate information is rectified or erased;
 - Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
 - Processed in a manner that ensures appropriate security of the information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- 2.2. Prior to processing any biometric data or implementing a system that involves processing biometric data, a Data Protection Impact Assessment would be carried out to:
 - Describe the nature, scope, context and purposes of the processing.
 - Assess necessity, proportionality and compliance measures.
 - Identify and assess risks to individuals.
 - Identify any additional measures to mitigate those risks.
- 2.3. Where the Trust uses pupils' biometric data the Trust will comply with the requirements of the Protection of Freedoms Act 2012. This means that prior to any biometric recognition system being put in place or processing a pupil's biometric data, The Corinium Education Trust (or a school within the Trust) would send the pupil's parents/carers a Parental Notification and Consent Form for the use of Biometric Data and written consent will be obtained from at least one parent/carers of the pupil before the collection or use of a pupil's biometric data.

- 2.4. The Trust will not process the biometric data of a pupil under the age of 18 in the following circumstances:
- The pupil (verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
 - No parent/carer has consented in writing to the processing;
 - A parent/carer has objected in writing to such processing, even if another parent/carer has given written consent.
- 2.5. Parents/carers and pupils can withdraw their consent to the collection and processing of biometric data at any time. Where this happens, any biometric data relating to the pupil that has already been captured would be deleted.
- 2.6. Where an individual objects to taking part in the collection and processing of biometric data, reasonable alternative arrangements will be provided that allow the individual to access any relevant services, e.g. where a biometric system uses a pupil's fingerprints to pay for school meals, the pupil will be able to use an alternative payment means for the transaction instead. Alternative arrangements will not put the individual at any disadvantage, create difficulty in accessing the relevant service, or result in any additional burden being placed on the individual (and the pupil's parents/carers, where relevant).
- 2.7. Biometric data would be managed and retained in line with the Trust's Records Management Policy. If an individual (or a pupil's parent/carer, where relevant) withdraws their consent for their/their child's biometric data to be processed, the data would be erased from the school's system.
- 2.8. There would be appropriate and robust security measures in place to protect the biometric data held by the Trust. Any breach to the Trust's biometric system(s) will be dealt with in accordance with the Trust's Data Protection Policy.

Document History

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Trust Lead	Director of Finance and Operations
Approved by	Trustees
First approval date	January 2020
Review frequency	Annual

Review date	Significant amendments	Made by	Next review
Jan 2021	No amends required; the Trust does not collect or hold biometric data.	AXT	Sep 2022
Oct 2022	No amendments or additions made except naming The Corinium Education Trust in full and changing Chief Executive to Trust Lead (CEO) in 1.2. Repaginated with numbered paragraphs.	JMW/CXH	Nov 2023
Nov 2023	Added reference to DfE guidance, 'Protection of biometric data of children in schools and colleges, July 2022' to 1.4	CXH	Nov 2024