

# Southmoor Academy



## BIOMETRICS POLICY

### **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.

Southmoor Academy 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 Academy'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 Academy must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the Academy rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained using the consent form attached (Appendix 1).

The Academy process biometric data as an aim to make significant improvements to our restaurant and lunch facilities. This is to ensure efficiency in the cashless payment system for the purchase of school meals and to replace the need to use QR codes or cash which can both be lost.

### **Consent and Withdrawal of Consent**

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

### *Consent for pupils*

When obtaining consent for pupils, both parents will be notified that the Academy intend to use and process their child's biometric information. The Academy 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 Academy 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 Academy 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 Academy 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 [info@southmooracademy.com](mailto:info@southmooracademy.com) and requesting that the Academy no longer use their child's biometric data.

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

The consent will last for the time period that your child attends the Academy (unless it is withdrawn).

### *Consent for staff*

The Academy will seek consent of staff before processing their biometric data. If the staff member objects, the Academy will not process or continue to process the biometric data and will provide reasonable alternatives. Staff who wish for the Academy to stop using their biometric data should do so by informing [finance@aspirenortheast.co.uk](mailto:finance@aspirenortheast.co.uk).

The consent will last for the time period that the staff member remains employed by the Academy (unless it is withdrawn).

### **Retention of Biometric Data**

Biometric data will be stored by the Academy 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 Academy's system no later than 72 hours.

### **Storage of Biometric Data**

At the point that consent is withdrawn, the Academy will take steps to delete the 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.

**Last review date:** 16.10.24

**Person responsible:** Deputy Head: Pastoral

**APPENDIX 1: CONSENT FORM FOR THE USE OF BIOMETRIC INFORMATION**

Please complete this form if you consent to taking your child's fingerprint by Southmoor Academy as part of an automated biometric recognition system. This biometric information will be used by Southmoor Academy for the purpose of administration of the academy restaurant.

In signing this form, you are authorising the academy to use your child's biometric information for this purpose until he/she either leaves the academy 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 academy at the following address:

Southmoor Academy  
Ryhope Road  
Sunderland  
SR2 7TF

Once your child ceases to use the biometric recognition system, his/her biometric information will be securely deleted by the academy

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Having read guidance provided to me by Southmoor Academy, I give consent to information from the fingerprint of my child:

Name of child \_\_\_\_\_ Form Group: \_\_\_\_\_

being taken and used by Southmoor Academy for use as part of an automated biometric recognition system for the administration of the academy restaurant for which this data will be used.

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

Name of Parent: .....

Signature: .....

Date: .....

Please return this form to:

School Office  
Southmoor Academy  
Ryhope Road  
Sunderland  
SR2 7TF