



# The Bishop Konstant Catholic Academy Trust

Learning Communities, Inspired by Faith

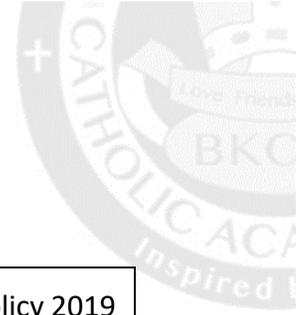
## Trust Biometrics Information Policy 2019



The Bishop Konstant Catholic Academy Trust,  
The Zucchi Suite, Nostell Business Estate, Nostell,  
Wakefield, WF4 1AB

**Telephone:** 01924 802285

**Email:** [admin@bkcat.co.uk](mailto:admin@bkcat.co.uk) **Website:** [www.bkcat.co.uk](http://www.bkcat.co.uk)



<b>POLICY DOCUMENT</b>	Trust Biometrics Information Policy 2019
<b>Legislation/Category: Academy Schools</b>	<b>Legally Required</b>
<b>Lead Member of Staff:</b>	Trust Business & Compliance Manager
<b>Approved by:</b>	BKCAT Trust Board
<b>Date Approved:</b>	May 2019
<b>Revision Date:</b>	May 2022
<b>Review Frequency:</b>	3 years

**All policies are written in line with our ethos:**

**Within the Bishop Konstant Catholic Academy Trust, our academies are communities where our children and young people are given a clear vision for life, a vision which is rooted in the person and teachings of Jesus Christ and which is faithful to the mission of the Catholic Church.**

**The Trust seeks to serve all our families (Catholic and non-Catholic alike) and to work with other partners in education for the benefit of our children and young people; we are committed to working together as academies and with the wider community for the common good. In our academies, we uphold the dignity and unique human value of every person as we strive for excellence in education; gifts and talents are shared between our academies as we aim to provide the highest standards for all our children and young people, aged 3 to 19 years throughout the Trust.**



## Trust Biometric Information Policy

### 1. Introduction

#### 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.

Academies that use pupils' biometric data must treat the data collected with appropriate care and must comply with the data protection principles as set out in the General Data Protection Regulation 2018.

The Information Commissioner considers all biometric information to be personal data as defined by the General Data Protection Regulation 2018; this means that it must be obtained, used and stored in accordance with the Regulation.

Personal data used as part of an automated biometric recognition system must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.<sup>1</sup>

The Protection of Freedoms Act 2012 includes provisions which relate to the use of biometric data in academies and colleges when used as part of an automated biometric recognition system.

Academies must ensure that the parent/carer of each pupil is informed of the intention to use the pupil's biometric data as part of an automated biometric recognition system. Parents/carers must be advised that alternative methods to biometric scanning are available for processing identity if required.

The written consent of the parent/carer or the pupil, where the pupil is deemed to have the capacity to consent must be obtained before the data is taken from the pupil and processed within the biometric recognition system. In no circumstances can a pupil's biometric data be processed without written consent.

---

<sup>1</sup> *Protection of Freedoms Act 2012*

*Section 26 Requirement to notify and obtain consent before processing biometric information*

*Section 27 Exceptions and further provision about consent and notification*

*Section 28 Protection of Biometric Information of Children in Education Interpretation*



Academies must not process the biometric data of a pupil where:

- a) The pupil (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data.
- b) A parent or pupil has not consented in writing to the processing; or
- c) A parent or pupil has objected in writing to such processing, even if another parent has given written consent.

Academies must provide reasonable alternative means of accessing the services to those pupils who will not be using an automated biometric recognition system.

## **2. Biometric Data and Processing**

### **2.1 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).

Biometric recognition systems can use many kinds of physical or behavioural characteristics such as those listed above.

### **2.2 What does processing data mean?**

'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. An automated biometric recognition system processes data when:

- (a) Recording pupils' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
- (b) storing pupils' biometric information on a database system; or
- (c) using that data as part of an electronic process, for example, by comparing it with biometric information stored on a database in order to identify or recognise pupils.

### **2.3 Who is able to give consent?**

The Data Protection Act gives pupils rights over their own data when they are considered to have adequate capacity to understand. Most pupils will reach this level of understanding at around age 13.



For this reason, for most pupils in a secondary school, it will normally be up to the individual pupil to decide whether or not to provide biometric data. Where the academy considers that the pupil does not have the capacity or they are under the age of 13, parents/carers will be asked to provide written consent.

#### **2.4 Alternative to Biometric**

The Academy will provide an alternative to biometric scanning for any parent/pupil objecting to the processing of biometric data.

#### **2.5 Length of Consent**

The original written consent is valid until such time as it is withdrawn. However, it can be overridden, at any time either parent/carer or the pupil themselves objects to the processing (subject to the parent's/carer's objection being in writing).

When the student leaves the Academy, their biometric data will be securely removed from the Academy's biometric recognition system.

#### **Monitoring and Review of this Policy**

The Trust shall be responsible for reviewing this policy from time to time to ensure that it meets legal requirements and reflects best practice.

The Bishop Konstant Catholic Academy Trust is an exempt charity regulated by the Secretary of State for Education. It is a company limited by guarantee registered in England and Wales, company number 8253770, whose registered office is at The Zucchi Suite, Nostell Business Estate, Nostell, Wakefield, WF4 1AB