



**BURTON
BOROUGH
SCHOOL**

School Biometric Guidance Addendum to Data Protection Policy

Policy Reviewer	Rita Barton in conjunction with Telford & Wrekin	Date of Review	December 2020
Date Presented to Governors	18 January 2021	Date of next Review	January 2022

1 What is biometric data?

1.1 Biometric data is personal information about an individual's physical or behavioural characteristics that can be used to identify a person. Example of biometric data could include:

Fingerprints	Face shape	Retina pattern	Iris pattern	Hand measures
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1.2 As biometric data is personally identifiable information, its processing has to comply with the Data Protection Act 2018 (DPA 18). Under the DPA 2018 biometric data is termed special category (sensitive) personal data.

1.3 A common example of schools using biometrics is where fingerprints are taken for use with school dinner's pupil accounts.

2 What are the DPA 18 requirements?

2.1 Biometric data should be processed as any other special category data would be processed under the DPA 18 as prescribed by your Data Protection Policy. Processing therefore must comply with the 6 principles of the act which are:

Lawfulness, fairness and transparency	Purpose limitation	Data minimisation
Accuracy	Storage limitation	Security, integrity and confidentiality

2.2 If you are going to collect/process biometric data, you need to complete a data protection impact assessment (DPIA) first. Your DPO has provided you with templates to do this and can offer support for completion.

2.3 As with processing any personal data, you will need a legal basis to start collecting/processing biometric data. As this information is special category information, you need one legal basis from Article 6 and one from Article 9. The ICO provide an interactive [lawful basis tool](#) to assist you in identifying the most appropriate legal basis.

2.4 If you decide consent is going to be your legal basis (which is likely), then you will need to obtain explicit consent as biometrics are special category data. Again, the ICO provide [guidance](#) on this.

2.5 Once you have completed your DPIA and identified your legal basis you then need to draw up a privacy notice to give to parents when they sign up/apply for their children to provide biometrics to school. The privacy notice should tell parents:

- Schools name and contact details (unless already clear)
- The name of your Data Protection Officer

- The reason you are processing biometric data
- The lawful basis you are using for processing
- Who will receive biometric data
- How long you will keep biometric data for
- The rights of the data subject
- The right to withdraw consent (if you are using consent)
- Right to complain to the ICO
- Whether you are meeting a contractual or legal requirement

If some of this information is on your main privacy notice on your website, then you can simply provide the link to this in the privacy notice.

We would suggest processing biometric data is also included in your main privacy notice.

3 What are the security requirements?

- 3.1 As stated above biometric data is classed, as special category information an enhanced level of security is required.
- 3.2 If the school is storing the biometric data, it must ensure it has appropriate technical and organisational controls in place to ensure the security of the data. See below for examples of each:

Technical Controls – examples:

- Firewalls
- Encryption
- Server patching
- Anti-virus software
- Password management
- 2 factor authentication

Organisational Controls – examples:

- Appropriate policies on areas such as data protection and information security
- Regular training on data protection
- Awareness campaigns on data protection and information security
- Training in accessing the biometric data

4 Where can I obtain more general help on biometrics?

- 4.1 There is more general advice on processing biometrics that can be found here

[Protection of biometric information of children in schools and colleges \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Protection_of_biometric_information_of_children_in_schools_and_colleges.pdf)