



# St Michael's C E Primary

## Protection of Biometric Data Policy

***"We are the seeds. Our school is the good ground which provides everyone with all they need to grow and achieve." (Our children)***

St Michael's is a Church of England Primary School built on distinctive Christian Values at the very heart of its community.

*We will provide:*

- a welcoming, inclusive school with strong relationships across our community, that celebrates diversity;
- excellent teaching with a nurturing approach, guiding first steps to next steps;
- an inspirational and challenging curriculum which ignites curiosity, encourages resilience and grows confidence so children become lifelong learners;
- a happy, safe and stimulating environment in which children can achieve their full potential;

So that our children will flourish in all they do and become good citizens

***"And some seed fell on good ground. This seed grew and made 100 times more grain." (Luke 8:8)***

This policy has been created in line with the DfE's 'Protection of biometric information of children in schools and colleges' guidance, alongside other relevant legislation. This guidance was last updated in March 2018, prior to the implementation of the UK GDPR and Data Protection Act 2018. We contacted the DfE, who confirmed they are updating the guidance to account for the UK GDPR – we will update this policy accordingly once the DfE's updated guidance has been published.

## Contents:

[Statement of intent](#)

### Statement of intent

[St Michael's C E Primary](#) is committed to protecting the personal data of all its pupils and staff; we **do not collect or process any biometric data**. {See example below}

### 1.1 What is biometric data?

- 1) 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.
- 2) The Information Commissioner considers all biometric information to be personal data as defined by the Data Protection Act 1998; this means that it must be obtained, used and stored in accordance with that Act (see relevant paragraphs below).
- 3) The Protection of Freedoms Act includes provisions which relate to the use of biometric data in schools and colleges when used as part of an automated biometric recognition system. These provisions are in addition to the requirements of the Data Protection Act 1998. (See relevant section below).

## 1.2 What is an automated biometric recognition system?

1) An automated biometric recognition system uses technology which measures an individual's physical or behavioural characteristics<sup>3</sup> 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.

2) Biometric recognition systems can use many kinds of physical or behavioural characteristics such as those listed in section 1 of the 'What is biometric data' section above.

## 1.3 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<sup>4</sup>. An automated biometric recognition system processes data when:

1)

- 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) More information on these topics is available via the **Associated Resources** section below.

This policy has been approved by the Governing Body and Head teacher of St. Michael's C of E Primary School.

**Chair of Governors ....**

**Signed:** .....  .....

**Print Name:** ... ..Katja Purvis.....

**Date:**... ..12<sup>th</sup> July 2022.....

**Head Teacher**

**Signed:** .....  .....

**Print name:**.....GAVIN JOHNSTON.....

**Date:** .....12<sup>th</sup> July 2022.....

