



St. Anselm's College
Edmund Rice Academy Trust

Protection of Biometric Information Policy

Version 1.2

Mission Statement:

Our Catholic Community offers a learning environment for us to develop our God given talents and to recognize Christ amongst us. We respect the dignity of God's creation and, inspired by Gospel values, seek to serve one another.

Document Owner:	Director of Finance
Committee:	Finance Committee
Frequency of Review:	Annually
Ratification by Governors	Autumn Term 2024

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 more 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.

The College 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 College'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 College must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the College 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.

The College process biometric data as an aim to make significant improvements to our canteen and lunch facilities. This is to ensure efficiency and to remove the need for cash to be used on site.

Consent and Withdrawal of Consent

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

Consent for students

When obtaining consent for students, parents/carers will be notified that the College intend to use and process their child's biometric information. The College 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 College will not be permitted to use that child's biometric data and alternatives will be provided, such as a PIN code.

The child may also object to the processing of their biometric data. If a child objects, the College 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 College 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.

Students 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 the College at gdpr@st-anselms.com requesting that the College no longer use their child's biometric data.

Students who wish for the College to stop using their biometric data do not have to put this in writing but should let Mr C. Hawksworth know.

The consent will last for the time period that your child attends the College (unless it is withdrawn).

If you wish to withdraw your consent at any time, this must be done so in writing and sent to gdpr@st-anselms.com. Once your son ceases to use the biometric recognition system, his biometric information will be securely deleted by the College within 72 hours.

Retention of Biometric Data

Biometric data will be stored by the College for as long as consent is provided (and not withdrawn). Once a student leaves, the biometric data will be deleted from the College's system no later than 72 hours.

Storage of Biometric Data

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