



Greater Manchester Academies Trust

Biometric Systems

Revision Information

This document has been approved for operation within	All Trust Establishments
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Person Responsible for Policy	GMAT COO
Owner	Greater Manchester Academies Trust
Signature of Approval	

Review Date	Changes Made	By Whom
10/09/2019	<ul style="list-style-type: none"> Policy created 	Andrew Woolley
13/10/2022	<ul style="list-style-type: none"> Added data retention and use of biometric data Equality statement added Use of biometric data added Data retention added DPIA section added Roles and responsibilities added Further information and guidance added 	Niall Beard
01/09/2023	<ul style="list-style-type: none"> No updates made 	NB
09/09/2024	<ul style="list-style-type: none"> No updates made 	AW

1. Equality, diversity and inclusion

The Trust is committed to complying with the Equality Act 2010 and is committed to the principles of equality and strives to ensure that everyone who wishes to be involved in our Trust whether as learners (and their parents/guardians), staff, trustees, governors or as a general member of the public:

- has a genuine and equal opportunity to do so without regard to their age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion and belief, sex and sexual orientation; and
- can be assured of an environment in which their rights, dignity and individual worth are respected without the threat of intimidation, victimisation, harassment, bullying or abuse.

Under the Public Sector Equality Duty (PSED), the Trust is required to have due regard to:

- the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities.
- the advancement of equality of opportunity between those who share a relevant protected characteristic and those who do not share it and to foster good relations across all protected characteristics.
- review all of its policies and procedures, through consultation with its academies and institutes, to ensure compliance with education and employment legislation including the Equality Act 2010.

The Trust has an Equality and Diversity Policy which is monitored and review annually as a minimum.

The data retention policy does not and must not contradict the contents of the Equality and Diversity Policy.

2. Roles and responsibilities

The CEO is responsible for:

- Reviewing this policy on an annual basis.

The COO is responsible for:

- Ensuring the provisions in this policy are implemented consistently.

The data protection officer (DPO) is responsible for:

- Monitoring the Trust/Academy's compliance with data protection legislation in relation to the use of biometric data.
- Advising on when it is necessary to undertake a data protection impact assessment (DPIA) in relation to the Trust/Academy's biometric system(s).
- Being the first point of contact for the ICO and for individuals whose data is processed by the Trust/Academy and connected third parties.

3. Biometric Recognition Systems Overview

Greater Manchester Academies Trust is committed to protecting the personal data of all its pupils and staff, this includes any biometric data we collect and process.

We collect and process biometric data in accordance with relevant legislation and guidance to ensure the data and right of individuals are protected.

Parents/carers will be notified before any biometric recognition system is put in place or before their child first takes part in it. The Trust will get written consent from at least one parent or carer before we take any biometric data from their child and first process it.

Parents/carers and pupils have the right to choose not to use the Trust's biometric system(s). We will provide alternative means of accessing the relevant services for those pupils. For example, pupils can pay for Trust dinners in cash at each transaction if they wish.

Parents/carers and pupils can withdraw consent, at any time, and we will make sure that any relevant data already captured is deleted.

As required by law, if a pupil refuses to participate in, or continue to participate in, the processing of their biometric data, we will not process that data irrespective of any consent given by the pupil's parent(s)/carer(s).

Where staff members or other adults use the Trust's biometric system(s), we will also obtain their consent before they first take part in it and provide alternative means of accessing the relevant service if they object. Staff and other adults can also withdraw consent at any time, and the Trust will delete any relevant data already captured.

4. Data protection impact assessments

Prior to processing biometric data or implementing a system that involves processing biometric data, a DPIA will be carried out.

The DPO will oversee and monitor the process of carrying out the DPIA.

The DPIA will:

- Describe the nature, scope, context and purposes of the processing.
- Assess necessity, proportionality and compliance measures.
- Identify and assess risks to individuals.
- Identify any additional measures to mitigate those risks.

When assessing levels of risk, the likelihood and the severity of any impact on individuals will be considered.

If a high risk is identified that cannot be mitigated, the DPO will consult the ICO before the processing of the biometric data begins.

The ICO will provide the Trust/Academy with a written response (within eight weeks or 14 weeks in complex cases) advising whether the risks are acceptable, or whether the Trust/Academy needs to take further action. In some cases, the ICO may advise the Trust/Academy to not carry out the processing.

The Trust/Academy will adhere to any advice from the ICO.

5. Use of biometric data

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Protection of freedoms act 2010
- Data protection act 2018
- GDPR 2018
- DfE (2018) 'Protection of biometric information of children in schools and colleges'

This policy operates in conjunction with the following trust policies:

- GDPR Policy
- Data Retention Policy

The Trust/Academy processes all personal data, including biometric data, in accordance with the key principles set out in the GDPR.

- The Trust/Academy ensures biometric data is:
 - o Processed lawfully, fairly and in a transparent manner.
 - o Only collected for specified, explicit and legitimate purposes, and not further processed in a manner that is incompatible with those purposes.
 - o Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
 - o Accurate and, where necessary, kept up-to-date, and that reasonable steps are taken to ensure inaccurate information is rectified or erased.
 - o Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
 - o Processed in a manner that ensures appropriate security of the information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- As the data controller, the Trust is responsible for being able to demonstrate its compliance with the provisions outlined above.

We collect biometric data for our cashless catering and signing in systems that the pupils use daily.

6. Storage of biometric data

The system the trust uses encrypts each individual fingerprint so it is not readable outside of the software. The fingerprint is stored as code rather than a picture of a physical fingerprint and there is no method of printing off, or using the fingerprint beyond the use of the fingerprint software.

7. Data retention

Biometric data will be managed and retained in line with the Trust's data retention policy.

If an individual (or a pupil's parent, where relevant) withdraws their consent for their/their child's biometric data to be processed, it will be erased from the trust's system.

8. Further information and guidance

This can be found via the following links:

Department for Education's 'Protection of Biometric Information of Children in Schools – Advice for proprietors, governing bodies, head teachers, principals and school staff:

<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools>

ICO guidance on data protection for education establishments: <https://ico.org.uk/for-organisations/in-your-sector/education/>