

## **Biometric Policy**

## **About this Policy**

The purpose of this policy is to outline the use of biometric data at St. Joseph's College. This policy complies with the Protection of Freedoms Act 2012, the DPA 2018 and the General Data Protection Regulations (GDPR).

#### What is biometric data?

Biometric data is personal information about an individual's physical or behavioural characteristics that can be used to identify that person. This can include their fingerprints, facial recognition, retina, iris patterns and hand measurements.

## 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. 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.

#### **Notification and Consent**

The College will ensure each parent of a student is notified of the College's intention to use the child's biometric data, specifically the scanning of a fingerprint, as part of an automated biometric recognition system in relation to cashless catering.

The system is administered and managed at the College by the Bursar.

Consent must be obtained of at least one parent via the New Starter Forms and this must be recorded in SIMS, before the data is taken from the student and processed. This applies to all students in the Senior School under the age of 18. In no circumstances will a student's biometric data be processed without written consent.

The College does not process any biometric data in the Prep School, including the Early Years Foundation Stage.

# Individual's rights

If a student under 18 objects or refuses to participate, or does not wish to continue to participate, in activities that involve the processing of their biometric data, the College will ensure that the students biometric data is not taken or used as part of the biometric recognition system. The refusal of a student overrides any parental consent to the processing.

The right of any individual to withdraw consent at any stage is outlined in the College's privacy notices.



# **Providing alternatives**

The College will provide a reasonable alternative means of accessing services for those students who will not be using an automated biometric recognition system. This will be in the form of a personal identification number (PIN).

### **Deletion of biometric data**

The College will ensure that biometric data is not kept longer than it is required and will destroy the data if the student withdraws consent, objects or no longer attends the College.