

POLICY

POLICY TYPE

MAT Policy to adopted in full across all schools	✓
LGC Policy to be reviewed and approved locally	

Approval Date:	2025/26 – AUTUMN TERM
Review Date:	2027/28 – AUTUMN TERM



*"Called by Christ
to be agents of change
and apostles of hope"*

ST OSCAR ROMERO CATHOLIC ACADEMY TRUST

PROTECTION OF CHILDREN'S BIOMETRIC INFORMATION

"St Oscar Romero Catholic Academy Trust is committed to providing excellence in education rooted in the Gospel values of Christ. We nurture the whole person - spiritually, academically, socially, and morally - empowering our students to recognise their God-given dignity, develop their unique talents, and become agents of positive change. Through the principles of Catholic social teaching, we foster communities of justice, solidarity, and compassion where all are welcomed, valued, and inspired to serve the common good."

1. Introduction

- This policy may not be relevant to all schools within the Trust, as the number of primary schools that use biometric data is still relatively small. However, this policy confirms the Trust's commitment to protecting information in line with best practice and allows for further innovation in this field within individual schools.

In considering the use of biometric information, the Trust is guided by Catholic Social Teaching, particularly Human Dignity and the Common Good, ensuring that innovation never compromises the rights, safety, or wellbeing of children.

2. What is Biometric Data?

- Biometric data means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allows or confirms the unique identification of that natural person, such as facial imaging or fingerprints.
- The Information Commissioner considers all biometric information to be sensitive personal data as defined by the GDPR 2018; this means that it must be obtained, used and stored in accordance with that Regulation.
- The Protection of Freedoms Act 2012 includes provisions which relate to the use of biometric data in schools when used as part of any automatic biometric recognition system. These provisions are in addition to the requirements of the GDPR 2018.
- The sensitive nature of biometric data requires a response grounded in Human Dignity and Stewardship, recognising the moral responsibility to protect information that uniquely identifies a child.

3. What is an automated biometric recognition system?

- An automated biometric recognition system uses technology which measures an individual's physical or behaviour 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. For example, some systems allow pupils to 'pay' for their school lunches in a cashless way by scanning their fingerprint.
- Biometric recognition systems can use many kinds of physical or behavioural characteristics such as those listed above.

4. 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. An automated biometric recognition system processes data when:

- Recording pupils' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
- Storing pupils' biometric information on a database system;
- 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.

5. Introducing a biometric system

- Decisions to introduce biometric systems are informed by Catholic Social Teaching, particularly Participation, Subsidiarity, and the Common Good, ensuring that families are informed, listened to, and respected, and that decisions are made at the most appropriate level in the best interests of children and the wider school community.
- Any Trust school introducing a biometric system (eg for lunches) will adhere closely to established best practice in this field, including:
 - Communicating clearly with parents/carers if/when a biometric system is being considered, and any changes that are subsequently made; there is no statutory duty to consult with parents/carers, but parents'/carers' views are important and so mechanisms need to be put in place to ensure that they are adequately considered;
 - Providing parents/carers with detailed information about any such system being introduced, so that they are able to make a fully informed decision as to whether or not to give consent for their child/children to use the system and to have their biometric data stored;
 - Making all reasonable efforts to ensure that consent given is genuine;

6. Consent Requirements

Consent arrangements reflect Human Dignity, Participation, and Promoting Peace, ensuring that parents/carers and children are treated with respect, that consent is informed and freely given, and that objections are handled sensitively and without pressure.

Written consent will be sought from at least one parent of any child or young person under the age of 18.

Consent given by one parent will be overridden if the other parent objects in writing to the use of their child's biometric information. Objections should be addressed to the Headteacher of the relevant school.

Parental consent can also be overridden by the child.

For Looked after Children (LAC), the Local Authority will be notified and notification will also be sent to all those caring for the pupil. Written consent will be obtained from at least one carer before the pupil's biometric data can be processed.

Where the school only holds contact information for only one parent, staff will consider whether any reasonable steps can or should be taken to ascertain the details of the other parent.

The school does not need to notify a particular parent or seek their consent if it is satisfied that:

- The parent cannot be found, after reasonable steps have been taken
- The parent lacks the mental capacity to object or consent
- Welfare or safeguarding concerns require that a particular parent is not contacted
- It is not practicable for a particular parent to be contacted

Where consent is withdrawn by an individual, or the parent of a pupil under 18, biometric data relating to that individual will be erased from the system.

These provisions reflect the Trust's commitment to Human Dignity, the Preferential Option for the Poor, and safeguarding, ensuring that vulnerable children are protected and that welfare considerations remain paramount.

7. Alternative arrangements

The provision of alternative arrangements reflects Distributive Justice and Human Dignity, ensuring that no child is disadvantaged or excluded from school services because consent has not been given for biometric data processing.

Alternative arrangements will be provided to any individual that does not consent to the processing of the biometric information.

Where an individual objects to taking part in the school's biometric data processing system(s), reasonable alternative arrangements will be provided that allow the individual to access the relevant service.

8. Protecting Data

- The Trust's approach to data protection is set out in the Data Protection Policy. Across the Trust we will ensure that personal information is dealt with properly and in accordance with the relevant legislation. This applies to personal information, including biometric data, regardless of the way it is used, recorded and stored, and applies to personal information held in both paper and electronic files.
- Robust data protection arrangements demonstrate Stewardship, Solidarity, and the Common Good, ensuring that children's biometric information is handled lawfully, securely, and with the utmost care.

This policy reflects the Trust's commitment to living out Catholic Social Teaching through the ethical use of technology, the protection of children's dignity and rights, and the promotion of trust, justice, and peace within the school community.