

ALAMEDA MIDDLE SCHOOL



Ambitious  Motivated
Confident to Soar

BIOMETRICS POLICY

November 2025

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BIOMETRICS POLICY

This policy explains how the school collects, processes, and protects the biometric data of pupils and staff in compliance with UK data protection legislation.

1. Biometric Data and Our Purpose

Biometric data is personal information about an individual's unique **physical or behavioural characteristics** that can be used to identify that person. This includes:

- Fingerprints
- Facial shape
- Retina and iris patterns
- Hand measurements

Under the UK General Data Protection Regulation (UK GDPR), biometric data is considered **Special Category Data**. This means it is highly sensitive and requires the highest level of protection to safeguard your fundamental rights and freedoms.

Why We Use Biometric Data

The school processes biometric data to make significant improvements to our **canteen and lunch facilities**. Our legitimate objective is to:

- Ensure **efficiency** and speed up service at peak times.
- Remove the need for **cash** transactions.

2. Our System and Legal Compliance

The Automated Biometric Recognition System

An automated biometric recognition system uses technology that electronically measures an individual's physical or behavioural characteristics. The system automatically compares this information with biometric data stored in the system to verify identity. Our system uses **Thumbprints**.

Legal Basis and Compliance

This policy is compliant with **The Protection of Freedoms Act 2012** (sections 26 to 28), the **Data Protection Act 2018**, and the **UK GDPR**.



The processing of biometric information includes obtaining, holding, recording, or carrying out any operation on the data (e.g., disclosing or deleting it).

As biometric data is Special Category Data, our legal basis for processing it is **Explicit Consent**. We will not process biometric data without the relevant consent being provided and maintained.

Data Protection Impact Assessment (DPIA)

The school carried out a rigorous **Data Protection Impact Assessment (DPIA)** before implementation. This process confirmed that using biometrics is a **necessary and proportionate** means of achieving our stated objectives. The DPIA has informed the strict security measures and contents of this policy.

3. Consent and Your Right to Object

The school will not process biometric information without the relevant consent. Consent will last for the duration the individual attends the school or remains employed (unless withdrawn earlier).

3a. Consent for Pupils (Specific Rules)

When obtaining consent for pupils, both parents will be notified. We only require written consent from **one parent** (in accordance with the Protection of Freedoms Act 2012), *provided no other parent objects* to the processing.

Action	Result
A parent objects to the processing.	The school will not be permitted to use the child's biometric data.
The pupil objects to the processing.	The school will not process or continue to process their biometric data, irrespective of parental consent.

Where there is an objection, the school will provide reasonable alternatives (e.g., a card or PIN) that allow the child to access the same facilities.

3b. Consent for Staff

The school will seek the consent of staff before processing their biometric data. If the staff member objects, the school will not process or continue to process the data and will provide reasonable alternatives.

Withdrawal of Consent (Objection)

Pupils, staff, and parents can object or withdraw consent at any stage.

Individual	How to Withdraw Consent
Parent/Guardian	By writing to the school office at office@alamedamiddleschool.org.uk requesting that the school no longer use their child's biometric data.
Pupil	By letting the School Business Manager know (a written request is not required).
Staff Member	By writing to the School Business Manager .

4. Security and Deletion of Biometric Data

Storage and Security

Biometric data will be kept securely. Systems and procedural controls will be put in place to prevent any unauthorised or unlawful access or use. The biometric data is only used for the purposes for which it was obtained and will not be unlawfully disclosed to third parties.

Retention and Deletion

Biometric data will be stored by the school for as long as consent is provided (and not withdrawn).

Deletion: Once a pupil or staff member leaves the school or withdraws consent, the biometric data will be securely deleted from the school's system no later than **30 days** thereafter.

5. Consent Form

Consent can be given or withdrawn using the link to the form below. It is also available through Edulink.

<https://forms.office.com/e/M5yKrwF2dW>