

Saint Joseph's Catholic Primary Voluntary Academy.



Biometric Data Policy

Written July 2020
Updated September 2021
Updated February 2023

Biometric data policy

Date	Review Date	Coordinator	Nominated Governor
February 2023	February 2024	Mrs E. McCullagh	Mr R. Mellows

Biometric data is information linked to a reading or measurement of a person's biological features of characteristics: most commonly fingerprints or palm prints, iris or retina scans and other facial recognition technology and including DNA.

At Saint Joseph's Academy at the time of writing the policy, no biometric data is used at Saint Joseph's school but we recognize that, at some point in the future, we may need to take and use biometric data. If we do use take biometric data, this policy will be used and followed.

Under the GDPR personally identifiable biometric data is defined as 'special category' personal data, which means that explicit consent is required from an individual to use the biometric data.

The Protection of Freedoms Act 2012 states the following:

- 1.1 Written consent is required from at least one parent for all pupils under the age of 18 where biometric data personal information is used in an automated recognition system.
- 1.2 Schools do not need to have written consent from the pupil, they do need to respect pupils' wishes should they refuse to participate. A pupil's objection will always override parental consent in this regard and the objection of one parent can override the consent of another. Consent may also be withdrawn at any stage.
- 1.3 Reasonable alternative arrangements must be provided for pupils or staff who do not use automated biometric recognition systems either because their parents have refused consent (or a parent has objected in writing) or due to the pupil's own refusal or the staff member's refusal to participate.
- 1.4 Alternative arrangements ensure that pupils and staff do not suffer any disadvantage or difficulty in accessing services, school premises etc. as a result of them not participating.

2 Procedure

- 2.1 All parents will be asked to complete a biometric data consent form for their child. The form will state what the biometric data is to be used for.
- 2.2 All staff may be offered the opportunity to provide their biometric data.
- 2.3 The data that is held will not be used by any other organisation for any other purpose, except solely as necessary for the purposes stated in the form filled in by the parent/carer and the School will not use biometric information for any reason other than those agreed to by the parent/carer.
- 2.4 If parents object to the use of their child's biometric information or a member of staff does not wish to provide biometric information, the school will endeavour to provide a work around to the system without using biometrics.
- 2.5 Once a pupil or member of staff stops using the biometric recognition system, their biometric information will be securely deleted by the School in accordance with the Information Commissioner's Guidance.

3 Review and Development

3.1 Procedure

This document, together with the effectiveness of its procedures, is reviewed annually by the Senior Leadership Team.

Role of the Governing Body

The Governing Body has:

- appointed a member of staff to be responsible for coordinating and promoting spiritual, moral, social and cultural development throughout;
- delegated powers and responsibilities to the Headteacher to ensure all school personnel and stakeholders are aware of and comply with this policy;

- responsibility for ensuring that the school complies with all equalities legislation;
- nominated a designated Equalities governor to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
- responsibility for ensuring funding is in place to support this policy;
- make effective use of relevant research and information to improve this policy;
- responsibility for ensuring this policy and all policies are maintained and updated regularly;
- responsibility for ensuring all policies are made available to parents;
- the responsibility of involving the School Council in the development, approval, implementation and review of this policy;
- nominated a link governor to visit the school regularly, to liaise with the Headteacher and the coordinator and to report back to the Governing Body;
- responsibility for the effective implementation, monitoring and evaluation of this policy

Role of the Headteacher

The Headteacher will:

- ensure all school personnel, pupils and parents are aware of and comply with this policy;
- work closely with the link governor and coordinator;
- provide leadership and vision in respect of equality;
- make effective use of relevant research and information to improve this policy;
- provide guidance, support and training to all staff;
- monitor the effectiveness of this policy by:
 - monitoring learning and teaching through observing lessons
 - monitoring planning and assessment
 - speaking with pupils, school personnel, parents and governors
- annually report to the Governing Body on the success and development of this policy

Role of the Nominated Governor

The Nominated Governor will:

- work closely with the Headteacher;
- ensure this policy and other linked policies are up to date;
- ensure that everyone connected with the school is aware of this policy;
- attend training related to this policy;

Role of the Coordinator

The coordinator will:

- lead the development of this policy throughout the school;
- work closely with the Headteacher and the nominated governor;
- make effective use of relevant research and information to improve this policy;
- provide guidance and support to all staff;
- provide training for all staff on induction and when the need arises regarding;
- keep up to date with new developments and resources;
- undertake risk assessments when required;
- review and monitor;

Role of School Personnel

School personnel will:

- comply with all aspects of this policy;
- maintain high standards of ethics and behaviour within and outside school and not to undermine fundamental British values;

- implement the school's equalities policy and schemes;
- report and deal with all incidents of discrimination;
- attend appropriate training sessions on equality;
- report any concerns they have on any aspect of the school community

Role of the School Council

The School Council will be involved in:

- discussing improvements to this policy during council meetings with Mrs Bradley;
- organise surveys to gauge the thoughts of all pupils;
- reviewing the effectiveness of this policy with Mrs Bradley

Role of Pupils

Pupils will:

- be aware of and comply with this policy;
- listen carefully to all instructions given by the adults in school;
- ask for further help if they do not understand;
- treat others, their work and equipment with respect;
- support the school Code of Conduct and guidance necessary to ensure the smooth running of the school;
- liaise with the school council;
- take part in questionnaires and surveys

Role of Parents/Carers

Parents/carers will:

- be aware of and comply with this policy;
- be asked to take part in periodic surveys conducted by the school

Raising Awareness of this Policy

We will raise awareness of this policy via:

- the school website
- the Staff Handbook
- meetings with parents such as introductory, transition, parent-teacher consultations and periodic curriculum workshops
- school events
- meetings with school personnel
- communications with home such as weekly newsletters and of end of half term newsletters
- reports such annual report to parents and Headteacher reports to the Governing Body
- information displays in the main school entrance

Training

All school personnel:

- have equal chances of training, career development and promotion
- receive training on induction which specifically covers:
 - All aspects of this policy
 - Promotion of British Values
 - Equal opportunities
 - Inclusion

- receive periodic training so that they are kept up to date with new information
- receive equal opportunities training on induction in order to improve their understanding of the Equality Act 2010 and its implications

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

Monitoring the Implementation and Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the coordinator, the Headteacher and the nominated governor.

Headteacher:	<i>E. McCullagh</i>	Date:	February 2023
Chair of Governing Body:	<i>R. Mellows</i>	Date:	February 2023

Initial Equality Impact Assessment

Please complete an initial equality impact assessment once this policy has been customised to suit your purposes.

Policy Title	The aim(s) of this policy	Existing policy (✓)	New/Proposed Policy (✓)	Updated Policy (✓)
Biometric data	To ensure we comply with the law relating to biometric data			✓

This policy affects or is likely to affect the following members of the school community (✓)	Pupils	School Personnel	Parents/carers	Governors	School Volunteers	School Visitors	Wider School Community
	✓	✓	✓	✓	✓	✓	✓

Question	Equality Groups															Conclusion													
	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'yes' or 'not sure'				
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Yes	No
Does or could this policy have a negative impact on any of the following?		✓			✓			✓			✓			✓			✓			✓			✓			✓		✓	
Does or could this policy help promote equality for any of the following?	✓			✓			✓			✓			✓			✓			✓			✓			✓			✓	
Does data collected from the equality groups have a positive impact on this policy?	✓			✓			✓			✓			✓			✓			✓			✓			✓			✓	

Conclusion	We have come to the conclusion that after undertaking an initial equality impact assessment that a full assessment is not required.
-------------------	---

Preliminary EIA completed by	Date	Preliminary EIA approved by	Date
Kate Melling	July 20	E. McCullagh	July 20
Reviewed	Sept 21		Sept 21
Reviewed	Feb 2023		Feb 2023

Policy Evaluation

Policy Approval Form

Policy Title:	Biometric data					Date when written:	July 2020		
Policy written by:	CMAT					New Policy (✓ or x)	✓	Revised Policy (✓ or x)	
Stakeholders consulted in policy production: (✓ or x)	Governors	Senior Leadership Team	Teaching Personnel	Support Personnel	Administrative Personnel	Parents	Pupils	Local Community	
	✓	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Date when approved by Governors:			Date when presented to stakeholders:	December 2015 March 2016 Dec 2017	Date when implemented:	December 2015 March 2016 Dec 2017			
Published on: (✓ or x)	School Website			School Prospectus			Staff Handbook		
	✓			<input type="checkbox"/>			<input type="checkbox"/>		