



## **Statement of intent**

The 1590 Trust is committed to protecting the personal data of all its staff and students which includes any biometric data collected and processed.

The 1590 Trust collects and processes biometric data in accordance with relevant legislation and guidance to ensure the data and the rights of individuals are protected. This policy outlines the procedure the Trust follows when collecting and processing biometric data and operates in conjunction with the Trust GDPR Policy.

## **Legal framework**

This policy has due regard to all relevant legislation including the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and the Information Commissioner's Office (ICO) guidance on biometric data.

## Roles and responsibilities

1. The 1590 Trust Board is responsible for reviewing this policy every three years.
2. The Chief Executive and Trust School Headteachers/Head of School are responsible for ensuring the provisions of this policy are implemented consistently.
3. The Data Protection Officer (DPO) is responsible for:

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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 and seek their advice.

### Notification and consent

When using a biometric recognition system (e.g. using a biometric scanner to pay with cash), the Trust will comply with the Protection of Freedoms Act 2012.

When using a biometric recognition system, the Trust will notify relevant parents/guardians of their intention to process the biometric information and request their consent to do so. Written consent will be sought from at least one parent. An objection or refusal will override any parental consent to the processing. A student does not need to provide consent if they are under 16 years of age.

For more information, please contact the Data Protection Officer.

Notification sent to parents and other appropriate individuals or agencies will include information regarding the following:

1. Details about the type of biometric information to be taken.
2. How the data will be used.
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The Trust will not process the biometric data of a student under the age of 18 in the following circumstances:

- The student objects or refuses to participate in the processing of their biometric data.
- No parent or carer has consented in writing to the processing.
- A parent has objected in writing to such processing, even if the other parent has given written consent.

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Alternative arrangements will be provided to any individual that does not consent to take ] æă Á@ÁVi~•ȳ Áă { ^ċăÁ•ċ { ċăÁ Áă ^Á ũ@iæ Á | æ ċ

### Alternative arrangements

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The Trust should work to ensure that alternative arrangements will not put the individual at any disadvantage, create difficulty in accessing the relevant service or result in any additional burden being placed on the individual and/or their parents/guardians where relevant.

### Data retention

Biometric data will be managed and retained in line with data retention guidelines. If an

### Breaches

There are appropriate and robust security measures in place to protect the biometric