Biometrics Policy

Hampton Gardens

Policy last reviewed:	January 2026
Next review due:	January 2027
Member of staff responsible:	Kevin Ainslie, Head of School
Ratified by:	Hampton Gardens Local Governing Body

1. Aims and Introduction

Our school aims to ensure that all biometric data collected for staff and pupils is collected, stored and processed in accordance with the additional requirements of sections 26 to 28 of the Protections of Freedoms Act 2012, this includes provisions which relate to the use of biometric data in schools and colleges who use an automated biometric recognition system. These provisions are in addition to the requirements of GDPR.

2. Legislation and guidance

This policy meets the requirements of the Protection of Freedoms Act 2012 when referring to our use of biometric data.

3. What is biometric data?

3.1. Biometric information (data) means personal information about an individual's physical or behavioural characteristics that can be used to identify that person; this can include their fingerprints, facial shape, retina and iris patterns, and hand measurements.

3.2. The Information Commissioner considers all biometric information to fall under the definition of "special category" data as defined by the Data Protection Act 2018; this means that it must be obtained, used and stored in accordance with that Act.

4. Biometric Recognition System

Where we use pupils' biometric data as part of an automated biometric recognition system (for example, pupils use finger prints to receive school dinners instead of paying with cash), we will comply with the requirements of the Protection of Freedoms Act 2012.

Parents/carers will be notified before any biometric recognition system is put in place or before their child first takes part in it. The school will get written consent from at least 1 parent or carer before we take any biometric data from their child and first process it.
Parents/carers and pupils have the right to choose not to use the school's biometric system(s). We will provide alternative means of accessing the relevant services for those pupils.

Parents/carers and pupils can withdraw consent, at any time in writing, and we will make sure that any relevant data already captured is deleted.

As required by law, if a pupil refuses to participate in, or continue to participate in, the processing of their biometric data, we will not process that data irrespective of any consent given by the pupil's parent(s)/carer(s).

5. Linked to other relevant policies

This policy is linked to our:

5.1. Electronic Data Retention policy
5.2. Data Protection Policy
5.3. Subject Access Request Policy

APPROVED BY GOVERNORS:

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SIGNATURE **NAME** **DATE**: 11 March 2026