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independence together

Biometrics Policy

Statutory

Reviewed annually

Signed:  (Chair of the Trust)

Date December 2025

Review Due: December 2026

Biometric Data Policy

1. Introduction 1.1 This Biometric Data Policy sets out the guidelines and procedures for the collection, storage, and use of biometric data within The Rivermead Inclusive Trust, primary/Secondary schools in the United Kingdom.
2. Purpose 2.1 The purpose of this policy is to ensure that the collection and use of biometric data is handled in a fair, transparent, and secure manner, in compliance with applicable laws and regulations, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
3. Scope 3.1 This policy applies to all staff, students, parents, and visitors of Rivermead Inclusive Trust who may be subject to the collection and use of biometric data.
4. Definitions 4.1 For the purpose of this policy, the following terms shall have the meanings assigned to them: 4.1.1 Biometric data: Personal data resulting from specific technical processing relating to the physical, physiological, or behavioral characteristics of an individual, which allows or confirms the unique identification of that individual. 4.1.2 Biometric information: The raw data obtained from the measurement or analysis of biometric characteristics. 4.1.3 Biometric template: A mathematical representation of a biometric characteristic that can be used for comparison or identification purposes. 4.1.4 Biometric system: Any system that collects, stores, uses, or analyzes biometric data for identification or verification purposes. 4.1.5 Data subject: An individual to whom biometric data relates.
5. Collection and Use of Biometric Data 5.1 Rivermead Inclusive Trust may collect and use biometric data for the following purposes: 5.1.1 Access control: Biometric data may be used to grant access to certain areas of the school premises, such as entry into the building, classrooms, or the library. 5.1.2 Student identification: Biometric data may be used to identify students during various activities, such as taking attendance, borrowing library books, or accessing computer systems. 5.1.3 Cashless payments: Biometric data may be used to facilitate cashless transactions within the school premises, such as for purchasing meals or other goods. 5.1.4 Security: Biometric data may be used to enhance the overall security of the school premises by ensuring only authorized individuals gain access.
6. Lawful Basis for Processing Biometric Data 6.1 Rivermead Inclusive Trust will only process biometric data if it has a lawful basis for doing so, as outlined in the GDPR. The lawful basis for processing biometric data includes: 6.1.1 Consent: Rivermead Inclusive Trust will obtain explicit consent from the data subject, or their parent/guardian if they are under the age of 16, prior to

collecting and using their biometric data. 6.1.2 Legitimate interests:

Rivermead Inclusive Trust may process biometric data if it is necessary for the legitimate interests pursued by the school or a third party, provided that such interests do not override the rights and freedoms of the data subject.

6.1.3 Legal obligation: Rivermead Inclusive Trust may be required by law to process biometric data for specific purposes, such as compliance with safeguarding or health and safety obligations.

7. Data Protection Principles 7.1 Rivermead Inclusive Trust will adhere to the following data protection principles when processing biometric data:
 - 7.1.1 Lawfulness, fairness, and transparency: Biometric data will only be collected and used in a fair and transparent manner, with the explicit consent of the data subject, or their parent/guardian if they are under the age of 16.
 - 7.1.2 Purpose limitation: Biometric data will only be collected and used for the specified purposes outlined in this policy.
 - 7.1.3 Data minimization: Only the necessary biometric data required for the specific purpose will be collected and processed.
 - 7.1.4 Accuracy: Reasonable steps will be taken to ensure the accuracy of the biometric data collected.
 - 7.1.5 Storage limitation: Biometric data will be retained for no longer than is necessary for the purposes it was collected, in accordance with the school's data retention policy.
 - 7.1.6 Integrity and confidentiality: Appropriate technical and organizational measures will be implemented to ensure the security and confidentiality of biometric data.
8. Data Subject Rights 8.1 Data subjects have the following rights regarding their biometric data:
 - 8.1.1 Right to information: Data subjects have the right to be informed about the collection and use of their biometric data.
 - 8.1.2 Right of access: Data subjects have the right to access their biometric data and obtain a copy of it.
 - 8.1.3 Right to rectification: Data subjects have the right to request the correction of any inaccurate or incomplete biometric data.
 - 8.1.4 Right to erasure: Data subjects have the right to request the deletion or removal of their biometric data when there is no compelling reason for its continued processing.
 - 8.1.5 Right to restrict processing: Data subjects have the right to request the restriction or suppression of their biometric data under certain circumstances.
 - 8.1.6 Right to object: Data subjects have the right to object to the processing of their biometric data in certain situations.
 - 8.1.7 Right to data portability: Data subjects have the right to request the transfer of their biometric data to another organization in a structured, commonly used, and machine-readable format.
9. Security and Retention of Biometric Data 9.1 Rivermead Inclusive Trust will implement appropriate technical and organizational measures to ensure the security and protection of biometric data, including encryption, access controls, and regular security audits. 9.2 Biometric data will be retained for no

longer than is necessary for the purposes it was collected, in accordance with the school's data retention policy.

10. Third-Party Sharing and Transfers 10.1 Rivermead Inclusive Trust will not share biometric data with any third parties without obtaining explicit consent from the data subject or their parent/guardian, unless required by law. 10.2 If the school intends to transfer biometric data outside the European Economic Area (EEA), it will ensure that appropriate safeguards are in place to protect the data in accordance with the GDPR.
11. Breach Notification 11.1 In the event of a breach involving biometric data, Rivermead Inclusive Trust will follow the procedures outlined in its Data Breach Response Plan and promptly notify the individuals affected and the Information Commissioner's Office (ICO) as required by law.
12. Training and Awareness 12.1 Rivermead Inclusive Trust will provide regular training and awareness programs to staff, students, and parents regarding the collection, use, and protection of biometric data.
13. Review and Updates 13.1 This Biometric Data Policy will be reviewed on an annual basis or as required by changes in applicable laws and regulations. 13.2 Any updates or revisions to this policy will be communicated to staff, students, and parents.
14. Conclusion 14.1 Rivermead Inclusive Trust is committed to ensuring the responsible and lawful handling of biometric data. This policy aims to protect the privacy and rights of individuals while maintaining a safe and secure environment within the school.



