

Biometrics Policy

Statutory	Yes
Responsibility	School Business Manager
Approval Authority	Governing Body – Business Committee
Approval Date	Spring 2026
Next Review and Frequency	Spring 2027 (Annually)
Monitoring and Evaluation	Governors Business Committee
Author	School Business Manager
Availability	Website, Every
Version	Final
Equality Impact Assessment	Yes

Biometrics Policy

What is Biometric Data?

Biometric 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. At Raynes Park High School we use fingerprint mapping.

All biometric data is considered to be special category data under the UK General Data Protection Regulation (UK GDPR). This means the data is more sensitive and requires additional protection as this type of data could create more significant risks to a person's fundamental rights and freedoms.

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

What is an Automated Biometric Recognition System?

An automated biometric recognition system uses technology which measures an individual's physical or behavioural characteristics by using equipment that operates 'automatically' (i.e., electronically). Information from the individual is automatically compared with biometric information stored in the system to see if there is a match in order to recognise or identify the individual.

The Legal Requirements under UK GDPR

'Processing' of biometric information includes obtaining, recording or holding the data or carrying out any operation or set of operations on the data including (but not limited to) disclosing it, deleting it, organising it or altering it.

As biometric data is special category data, in order to lawfully process this data, the School must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the School rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained via our online application form or via explicit written consent.

The School process biometric data for the purposes of our identifying individuals on our cashless catering system. The biometric data we use is a finger-scan – a numeric representation of a fingerprint. Biometric data is used because, unlike swipe cards or tokens, fingerprints cannot be lost or stolen. Our cashless catering system allows food and drink to be served more efficiently, therefore improving the break and lunchtime experience for staff and pupils.

Consent and Withdrawal of Consent

The School will not process biometric information without the relevant consent.

Consent for pupils

When obtaining consent for pupils, both parents/carers will be notified that the School intend to use and process their child's biometric information. The School only require written consent from one parent/carer (in accordance with the Protection of Freedoms Act 2012), provided no parent/carer objects to the processing.

If a parent/carer objects to the processing, then the School will not be permitted to use that child's biometric data and alternatives will be provided.

The child may also object to the processing of their biometric data. If a child objects, the School will not process or continue to process their biometric data, irrespective of whether consent has been provided by the parent(s).

Where there is an objection, the School will provide reasonable alternatives which will allow the child to access the same facilities that they would have had access to had their biometrics been used.

Pupils and parents/carers can also object at a later stage to the use of their child's/their biometric data. Should a parent/carer wish to withdraw their consent, they can do so by writing to the School at school@raynespark.merton.sch.uk requesting that the School no longer use their child's biometric data.

Pupils who wish for the School to stop using their biometric data do not have to put this in writing but should let the IT Manager or their Head of Year know.

The consent will last for the time period that your child attends the School (unless it is withdrawn).

Consent for staff

The School will only process biometric data of staff who request to use it. Staff who wish for the School to stop using their biometric data should do so by writing to Damian Jackson.

The consent will last for the time period that the staff member remains employed by the School (unless it is withdrawn).

Retention of Biometric Data

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

Once a pupil or staff member leaves, the biometric data will be deleted from the School's system no later than 72 hours.

Storage of Biometric Data

At the point that consent is withdrawn, the School will take steps to delete their biometric data from the system and no later than 72 hours.

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

Equality Impact Assessment

Policy	Biometrics Policy
EIA completed by:	Samantha Barnard
Contributors to EIA:	
Policy will affect	× Pupils × Staff ☐ Governors ☐ Volunteers ☐ Visitors
Date completed:	11/03/25

Impact analysis

GROUP	POSITIVE IMPACT	NEUTRAL IMPACT	NEGATIVE IMPACT	WHY WILL THE POLICY HAVE THIS EFFECT?
Sex		✓		
Race		✓		
Religion or belief		✓		
Sexual orientation		✓		
Gender reassignment		✓		
Pregnancy or maternity		✓		
Age		✓		
Disability		✓		
Marriage or civil partnership		✓		
	Additional contextual groupings			
EAL		✓		
LAC		✓		
Families with separated parents		✓		

Outcomes

CONSULTATION AND STAKEHOLDER ENGAGEMENT

Include details of any internal or external consultation done, and its outcomes: N/A

FINAL DECISION ON POLICY

Please tick the appropriate decision:

- ☐ Remove the policy (if it's not statutory)
- ☐ Adapt the policy to address the equality issues you've identified
- ☒ Keep the policy without change