



Biometric Consent

All Trust Staff and Students

DISTRIBUTION	This is a Trust-wide policy and applies to all staff and Students within the Trust.		
DOCUMENT ID	FT-IT008 Data Protection – Biometric Consent		
AUTHOR	HRS	VERSION	1.1
RATIFIED BY THE DIRECTORS OF THE FALLIBROOME TRUST			
POLICY REVIEW CYCLE	3 YEARS		
POLICY REQUIREMENT	STATUTORY		

The Fallibroome Trust, Priory Lane, Macclesfield, Cheshire, SK10 4AF
Telephone: +44 (0) 1625 827 898 | Email: info@fallibroometrust.org.uk | Web: www.fallibroometrust.org.uk

The Fallibroome Trust (Company number: 07346144). A company incorporated as private limited by guarantee.
Registered Office situated in England and Wales

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GDPR AND SPECIAL CATEGORY DATA

The Data Protection Act 2018 controls how your personal information is used by organisations, businesses, or the government. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Special category data is personal data that the GDPR says is more sensitive, and so needs more protection. Under GDPR Biometric information is classified as special category data.

Special category data is broadly similar to the concept of sensitive personal data under the Data Protection Act. The requirement to identify a specific condition for processing this type of data is also very similar. One change is that the GDPR includes genetic data and some biometric data in the definition.

WHAT IS DIFFERENT ABOUT SPECIAL CATEGORY DATA?

The Trust must have a lawful basis for processing data under Article 6 of the General Data Protection Regulations, in exactly the same way as for any other personal data. The difference is that the Trust will also need to satisfy a specific condition under Article 9.

This is because special category data is more sensitive, and so needs more protection. For example, information about an individual's:

race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life or sexual orientation

This type of data could create a more significant risk to a person's fundamental rights and freedoms. For example, by putting them at risk of unlawful discrimination.

WHAT ARE THE CONDITIONS FOR PROCESSING SPECIAL CATEGORY DATA?

The Fallibroome Trust is using the condition of 'Explicit Consent' to confirm your acceptance of holding special category data, namely Biometrics under the conditions that are listed in Article 9(2) of the GDPR:

(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

The term '**Data subject**' refers to an individual who is the subject of personal data.

BIOMETRIC DATA AND THE FALLIBROOME TRUST

The Fallibroome Trust may use systems or services that require the use of special category data, specifically biometrics. These include:

- Printer document release stations
- Catering services

For the above systems, the Trust uses a biometric recognition system; this involves a low-resolution scan of a finger or thumb. This data is then stored as an encrypted file.

PARENTS AND GUARDIANS

The GDPR states that a pupil under the age of 13 cannot give consent for themselves, consent must be obtained from a person holding 'parental responsibility'. Current guidelines state that pupils from the age of 13 are considered mature enough to make decisions about their own personal information.

Please advise you child of this guideline and if once reaching the age of 13 your child does not wish their biometric data to be used, they may consequently withdraw their own consent by speaking to a member of the school's student services team.

Please indicate clearly on the form headed **Parent / Guardian Biometric Consent for Pupil** below whether you are giving explicit consent for your child to have their biometric data held by the Fallibroome Trust.

TRUST STAFF

Please indicate clearly on the form headed **Biometric Consent for Staff Member** below whether you are giving explicit consent for your biometric data to be held by the Fallibroome Trust.

PARENT / GUARDIAN BIOMETRIC CONSENT FOR PUPIL



Trust School:

Pupil Name:

Pupil Name:

Pupil Name:

I understand the definition and type of special category data that is collected by the Fallibroome Trust as outlined in this policy.

I confirm that I **CONSENT / DO NOT CONSENT** (delete as applicable) to holding of biometric (special category) data for the above pupil(s).

I understand that I may withdraw this consent at any time, by informing the Trust / local school in writing. I also understand that upon reaching the age of 13 the pupil(s) may withdraw their own consent.

Parent/Guardian Name:

Parent/Guardian Signature:

Date:

Please return the form to reception at your school.

BIOMETRIC CONSENT FOR STAFF MEMBER



I understand the definition and type of special category data that is collected by the Fallibroome Trust as outlined in this policy.

I confirm that I **CONSENT / DO NOT CONSENT** (delete as applicable) to the holding of my biometric (special category) data.

I understand that I may withdraw this registration at any time, by informing the Trust / local school in writing.

Trust School:

Staff Name:

Staff Signature:

Date:

Please return this section to a member of your schools administration team.