



# Biometric Data Policy

Approval Requirements	Headteacher
Approval/Ratification Date	December 2024
Review date	December 2027
Signed – Headteacher	<i>Dhaneka</i>

In the UK, schools generally need a biometric data policy if they process **biometric data**, which is defined under the UK GDPR and Data Protection Act 2018 as a special category of personal data used to uniquely identify an individual. Biometric data includes technologies such as **facial recognition, fingerprint scanning, or retina scanning**.

If the school only has photos of children without using them for facial recognition or similar technologies, these photos would not typically be classified as biometric data. Instead, they are considered **personal data**, which still needs to be handled in compliance with general data protection laws (e.g., UK GDPR).

**The school does not collect, use, or retain any biometric data for children or adults.**

*"The processing of **photographs** should not systematically be considered to be processing of special categories of personal **data** as they are covered by the definition of **biometric data** only when processed through a specific technical means allowing the unique identification or authentication of a natural person."*

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