



LATYMER UPPER & PREP SCHOOL

BIOMETRICS POLICY

PERSON(S) RESPONSIBLE:
DATE OF LAST REVIEW:
DATE OF NEXT REVIEW:

Compliance Officer
April 2025
April 2026

REVIEWED & APPROVED:
DATE OF APPROVAL:

AUDIT & RISK COMMITTEE OF GOVERNING BODY
7 May 2025

1. At Latymer Upper School and Latymer Prep School (hereafter referred to collectively as '**the School**') we strive to make the lives of our school community easier by enabling quick and easy access to a number of school facilities. We also aim to provide our biometric users with greater security over their own user identity when accessing school services.

2. For these purposes, our '**biometric users**' are pupils in years 6 to 13.

3. To this end, the School collects, stores and processes biometric data for the following purposes:

- To grant security access to the site;
- To register to access school lunch; and
- To use the School library services.

4. The School takes the collection and storage of all biometric data very seriously, and abides by the principles of the Protection of Freedoms Act 2012. We store all biometric data securely for the purposes of identification only. Biometric data is only processed for the purposes for which it was obtained and which have been notified to pupils and/or to their parents or legal guardians, and it is not unlawfully disclosed to third parties.

5. In accordance with the Protection of Freedoms Act 2012, the School notifies pupils and/or their parents or legal guardian(s), of its practice of collecting and processing biometric data as part of an automated biometric recognition system, and obtains electronic consent to that use from at least one parent or legal guardian when their child joins the School. Pupils, their parents or legal guardian(s) may withdraw their consent in writing at any time. **This means that pupils may also opt out of the use of their own biometric information at any time.**

6. Notification as part of the new joiner documentation is sent to parents or legal guardian(s), which informs them fully of the School's reasons for collecting and processing biometric data and includes full details of the data to be collected, its intended use, and the right of the pupil, parents/legal guardian(s) to opt out of the School's biometric recognition system. Those who opt out will be provided with a swipe card and details of alternative arrangements to access the relevant school services.

7. The automated recognition software which the School uses for the purposes of processing biometric data turns the individual's fingerprint into a mathematical algorithm. The image of the fingerprint itself is then deleted meaning that the information which is stored cannot be used to recreate the original image of the fingerprint.

8. The registration dates linked to the mathematical algorithm will be deleted six years after the pupil has left the School or if for some other reason they cease to use the biometric system. Student registrations dates and times are stored in iSAMS. The Biometric data for pupils is marked as "Former" once the iSAMS status is changed to "Former", or "Off Role". These former pupils' Biometric data should be deleted manually or automatically after so many days after the pupil has left the School (the default being 7 days) or if for some other reason they cease to use the biometric system. Please see the School's [Data Retention and Storage Policy](#).

9. If pupils or parents/legal guardian(s) have any questions about the School's collection and use of biometric information, they are welcome to contact the School's Compliance Officer who has responsibility for data management. The Compliance Officer's contact details are:

elp@latymer-upper.org 020 8629 2024
Latymer Upper School King Street, London W6 9LR

10. For more information about how the School uses your personal data please see our privacy notices: [Privacy Notice](#), [Staff Privacy Notice for Staff](#) and the Summary Privacy Notices for pupils in [LUS](#) and [LPS](#).