

Biometrics Policy

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Committee:	Audit & Risk Committee
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Revisions

Version	Page/Para No.	Description of Change	Approved On
2.0	Various	Updated template. Added consent option via MIS portal	

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1. Aims and Introduction

- 1.1. This Policy fulfils the Academy's/Trust's obligation to have an appropriate policy document in place where the processing of Special Category Biometric data is carried out.
- 1.2. The Biometrics Policy governs the school's collection and processing of biometric data.
- 1.3. The Trust will comply with the following legislation and guidance:
 - Data Protection Act 2018
 - UK General Data Protection Regulation (UK GDPR)
 - Protection of Freedoms Act 2012 (Sections 26–28)
 - Data (Use and Access) Act 2025
 - DfE: Protection of Biometric Information of Children in Schools and Colleges

2. Scope of the Policy

- 2.1. This policy applies to all academies within Meridian Trust who collect and process biometric data.

3. Responsibility

- 3.1. The Audit & Risk Committee is responsible for reviewing this policy on a regular basis.
- 3.2. The Academy Principal is responsible for ensuring the provisions in this policy are implemented consistently.
- 3.3. The Data Protection Officer (DPO) is responsible for:
 - 3.3.1. Monitoring the Trust's compliance with data protection legislation in relation to the use of biometric data.
 - 3.3.2. Advising on when it is necessary to undertake a data protection impact assessment (DPIA) in relation to the academy's biometric system(s).
 - 3.3.3. Being the first point of contact for the ICO and for individuals whose data is processed by the academy and connected third parties.

4. What is biometric data?

- 4.1. 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.
- 4.2. The Information Commissioner considers all biometric information to fall under the definition of "special category" data as defined by the UK GDPR; this means that it must be obtained, used and stored in accordance with that Act.
- 4.3. This policy complies with The Protection of Freedoms Act (section 26 to 28) These provisions are in addition to the requirements of the UK GDPR.

5. What is an automated biometric recognition system?

- 5.1. 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.

6. What does processing data mean?

- 6.1. '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.
- 6.2. As biometric data is classed as 'special category' personal data in order to lawfully process this data, the trust must have a legal basis for processing. When processing biometric data, the trust relies on explicit consent (which satisfies the fair processing conditions for personal data and special category data).
- 6.3. Consent is obtained by:
 - 6.3.1. Using the consent form in the attached appendix
 - 6.3.2. From the secure parent portal as part of the MIS system.
 - 6.3.3. Consent is usually obtained as part of the admissions process.
- 6.4. The trust's academies process biometric data as an aim to make significant improvements to the provision and payment of school meals. This is to ensure efficiency; to reduce the opportunity to publicly identify FSM/PP students, to eliminate the need for cash being used and to streamline the delivery of school meals.
- 6.5. Biometric systems usually store measurements taken from a person's physical/behavioural characteristics and not images of the characteristics themselves. For example, a fingerprint image is not stored on the system but measurements from the fingerprint are converted into a template and the template is stored. The templates are also biometric data. The academies & trust cannot turn the stored template into a fingerprint.

7. Notification and Parental Consent

- 7.1. The trust will not process biometric information without the relevant consent.
- 7.2. Consent for pupils
 - 7.2.1. When obtaining consent for pupils, parents will be notified that the individual school intends to use and process their child's biometric information. The school only require written consent from one parent (in accordance with the Protection of Freedoms Act 2012), provided no parent objects to the processing.
 - 7.2.2. If a parent objects to the processing, then the school will not be permitted to use that child's biometric data and alternatives will be provided.

- 7.2.3. 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).
- 7.2.4. 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. However in specific and unique circumstances it may not always be possible to protect the identity of FSM/PP students in every situation.
- 7.2.5. Students and parents can also object at a later stage to the use of their child's/their biometric data. Should a parent wish to withdraw their consent, they can do so by writing to the school using the relevant email address requesting that the school no longer uses their child's biometric data.
- 7.2.6. Students who wish for the school to stop using their biometric data should put this in writing to their pastoral lead recorded within the school MIS system.
- 7.2.7. The consent will last for the time period that the child attends the school (unless it is withdrawn).
- 7.2.8. In the context of the Protection of Freedom Act 2012 a "child" means a person under the age of 18.

7.3. Consent for staff

- 7.3.1. The school will seek consent of staff before processing their biometric data.
- 7.3.2. If the staff member objects, the school will not process or continue to process the biometric data and will provide reasonable alternatives. Staff who wish for the school to stop using their biometric data should do so by writing to the Principal.
- 7.3.3. The consent will last for the time period that the staff member remains employed by the trust (unless it is withdrawn).

8. The pupils right to refuse

- 8.1. The academy will not process the biometric data of a learner under the age of 18 in the following circumstances:
 - 8.1.1. The learner (verbally or non-verbally) objects or refuses to participate in the processing of their biometric data
 - 8.1.2. No parent or carer has consented in writing to the processing
 - 8.1.3. A parent has objected in writing to such processing, even if another parent has given written consent
- 8.2. If a learner objects or refuses to participate, or to continue to participate, in activities that involve the processing of their biometric data, the academy will ensure that the learner's biometric data is not taken or used as part of a biometric recognition system, irrespective of any consent given by the learner's parent(s).

9. Providing alternatives

- 9.1. Learners and staff have the right to not take part in the academy's biometric system.

- 9.2. Where an individual objects to taking part in the academy's biometric system(s), reasonable alternative arrangements will be provided that allow the individual to access the relevant service, e.g. where a biometric system uses fingerprints to pay for school meals, the person will be able to use a 4 digit PIN instead or by name lookup.
- 9.3. Alternative arrangements will not put the individual at any disadvantage or create difficulty in accessing the relevant service, or result in any additional burden being placed on the individual (and the learner's parents, where relevant).

10. Appendix A – Sample Letter

NOTIFICATION OF INTENTION TO PROCESS PUPILS' BIOMETRIC INFORMATION

Dear parent/carer,

The academy wishes to use information about your child as part of an automated Biometric recognition system. This is for the purposes of paying for food via our cashless catering system. The information from your child that we wish to use is referred to as 'biometric information' (see next paragraph). Under the Protection of Freedoms Act 2012 (sections 26 to 28), we are required to notify each parent and obtain the written consent of at least one parent before being able to use a child's biometric information for an automated system.

Biometric information and how it will be used

Biometric information is information about a person's physical or behavioural characteristics that can be used to identify them, for example, information from their fingerprint. The academy would like to take and use information from your child's fingerprint for the purpose of providing your child with our cashless catering service.

This automatic system will take measurements of your child's fingerprint and convert these measurements into a template to be stored on the system. An image of your child's fingerprint is not stored. Most of the data relating to the fingerprint is discarded and only random points on the fingerprint are retained. These random points are then converted into essentially a string of numbers and stored on the Academies ICT server. As the fingerprint image is not captured or stored it would not be possible to 'recover' the total image. It is this string of numbers that is used to permit your child purchase food.

You should note that the law places specific requirements on schools and colleges when using personal information, such as biometric information, about pupils for the purposes of an automated biometric recognition system. Please ensure that you have read the Meridian Trust Biometrics Policy which provides further detail governing this use and consent for taking your child's fingerprint.

Providing your consent/objecting

As stated above, in order to be able to use your child's biometric information, the written consent of at least one parent is required.

You can also object to the proposed processing of your child's biometric information at a later stage or withdraw any consent you have previously given. This means that, if you give consent but later change your mind, you can withdraw this consent.

The academy is also happy to answer any questions you or your child may have. If you do not wish your child's biometric information to be processed by the academy, or your child objects to such processing, the law says that we must provide reasonable alternative arrangements for children who are not going to use the automated system to access our cashless catering system.

Please note that when your child leaves the school/college, or if for some other reason he/she ceases to use the biometric system, his/her biometric data will be securely deleted.

I can confirm that I have read and understood the Meridian Trust Biometrics Policy
www.meridiantrust.co.uk/key-information/policies

Please tick one of the two boxes below:

	I give consent to information from the finger-image of my child being taken and used for use as part of an automated biometric recognition system for the purpose of the school canteen. I understand that I can withdraw this consent at any time in writing.
	I DO NOT give consent to information from the finger-image of my child being taken and used for use as part of an automated biometric recognition system for the purpose of the school canteen. I understand that I can provide this consent at any time in writing.

Student Name.....

Year.....

Tutor Group.....

Parent/Carer Signature

Full Name.....

Relationship to student.....