



Academies Trust

Biometrics Policy

Approved by the Trust Board's Audit and Risk Committee on 2 October 2025

Applicable from 3 October 2025

Last Reviewed:	September 2025 (in preparation to seek approval in October 2025)
Reviewed by:	Tammy Pyszky, Head of Data Protection
Next Review Date:	October 2026

This document represents a Trust-wide approach which is approved by the Trust Board for use in the Trust's academies that use biometric data.

Where an academy is using biometric data, they are required to add themselves to the [Trust's Central Register for academies collecting and processing biometric data](#).

Co-op Academies Trust

Biometrics Policy

This document will be reviewed annually, or sooner when significant changes are made to the law.

Version Number	Amendments
V2 (issued September 2024)	Added paragraph to detail the lawful basis for processing biometric data, data retention policies and breach procedures. Re-written paragraph to clarify consent requirements
V3 (issued October 2025)	Amended Trust Board to Trust Board's Audit and Risk Committee throughout. Slight changes to policies that should

	be read alongside.
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Co-op Academies Trust Biometrics Policy

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Co-op Academies Trust Biometrics Policy

1. Introduction

- 1.1. In order to support the achievement and learning of our pupils, the Co-op Academies Trust collects and processes personal data about our staff, pupils, parents and other individuals who come into contact with our Trust and our academies.
- 1.2. Biometric data is considered to be special category data - data which the law deems to be more sensitive and therefore needs more protection.
- 1.3. This policy is intended to ensure that where we collect biometric data, that we do so in accordance with relevant legislation and guidance to ensure the data and the rights of the individual are protected
- 1.4. This policy outlines the processes the Trust and each of our academies follow when collecting and processing biometric data.

2. What is biometric data and how is it processed?

- 2.1. Biometric data is personal information about an individual's physical or behavioural characteristics that can be used to identify that person, including their fingerprints, facial shape, retina and iris patterns, and hand measurements.
- 2.2. Some of our academies may use an automated biometric recognition system. This is a system 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.
- 2.3. Processing biometric data includes obtaining, recording or holding the data or carrying out any operation on the data including disclosing it, deleting it, organising it or altering it. An automated biometric recognition system processes data when:
 - Recording pupils' biometric data, e.g. taking measurements from a fingerprint via a fingerprint scanner.
 - Storing pupils' biometric information on a database.

- Using pupils' biometric data as part of an electronic process, e.g. by comparing it with biometric information stored on a database to identify or recognise pupils.
- 2.4. Many of our academies will use an automated biometric recognition system to record and hold information regarding fingerprints that can then be used by individuals to access certain parts of the building, or to obtain school lunches.

3. Legal Framework

- 3.1. This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:
- Protection of Freedoms Act 2012
 - Data Protection Act 2018
 - The UK General Data Protection Regulation (UK GDPR)
 - Department for Education (DfE) (2022) Protection of biometric information of children in schools and colleges
- 3.2. This policy operates in conjunction with the Trust's Data Protection policy, and associated appendices.

4. Roles and Responsibilities

- 4.1. The Trust Board's Audit and Risk Committee is responsible for reviewing this policy on an annual basis.
- 4.2. The Headteacher/Head of School in each academy is responsible for ensuring the provisions in this policy are implemented consistently.
- 4.3. The Data Protection Ambassador in each academy is responsible for monitoring the academy's compliance with this policy and the data protection legislation in regard to the use of biometric data. The Data Protection Ambassador will also act as the first point of contact for data subjects to address any queries or concerns regarding the collection and processing of their data.
- 4.4. The statutory role of Data Protection Officer is undertaken by the Head of Data Protection. The Head of Data Protection is responsible for advising the Data Protection Ambassadors on when it may be necessary to undertake a data protection impact assessment (DPIA) in relation to the academy's biometric system(s) and for being the first point of contact for the Information Commissioner's Office (ICO).

5. Data Protection Impact Assessments (DPIAs)

- 5.1. Where an academy is seeking to process biometric data or implement a system that involves processing biometric data, they must consult the Head of Data Protection and a DPIA must be carried out.
- 5.2. The Head of Data Protection will support the Data Protection Ambassador to conduct the DPIA to:
 - Assess the nature, scope, context and purposes of processing
 - Assess necessity, proportionality and compliance measures
 - Identify and assess risks to individuals
 - Identify any additional controls that may need to be applied to mitigate those risks.
- 5.3. When assessing levels of risk, the likelihood and the severity of any impact on individuals will be considered. If a high risk is identified that cannot be mitigated by additional and reasonable controls, the Head of Data Protection will consult the ICO before the processing of biometric data takes place.
- 5.4. The ICO will provide the Head of Data Protection with a written response and the academy must then adhere to any advice provided in response.

6. Lawful Basis for Processing Biometric Data

- 6.1. Biometric data is classified as Special Category Data under the UK GDPR and the Data protection Act 2018. Therefore, a lawful basis for processing under Article 9 of the UK GDPR must be identified, in addition to a lawful basis under Article 6 of the UK GDPR.
- 6.2. The lawful basis for processing biometric data in our academies is Explicit Consent (Article 9(2)(a)).
- 6.3. The requirement for consent for processing children's biometric information is also imposed by Section 25 of the Protection of Freedoms Act 2012.

7. Consent Requirements

Our academies are obliged to obtain consent for the processing of any biometric information, whether for adults or children

7.1. Staff and other adults

- 7.1.1. Consent will be sought from staff members or other adults prior to the processing of their biometric data.
- 7.1.2. Staff and other adults can object to the collection of their biometric data and can withdraw their consent at any time. If consent is withdrawn any biometric data relating to the individual that has already been captured will be deleted.

7.2. Pupils

- 7.2.1. Written consent will be sought from at least one parent of any child or young person under the age of 18.
- 7.2.2. The name and contact details of the pupil's parents will be taken from the admissions register.
- 7.2.3. Where the name of only one parent is included on the admissions register, the Headteacher / Head of Academy will consider whether any reasonable steps can or should be taken to ascertain the details of the other parent.

- 7.2.4. The academy does not need to notify a particular parent or seek their consent if it is satisfied that:

The parent cannot be found, e.g. their whereabouts or identity is not known.

The parent lacks the mental capacity to object or consent.

The welfare of the pupil requires that a particular parent is not contacted, e.g. where a pupil has been separated from an abusive parent who must not be informed of the pupil's whereabouts.

It is otherwise not reasonably practicable for a particular parent to be notified or for their consent to be obtained.

- 7.2.5. Consent given by one parent will be overridden if the other parent objects in writing to the use of their child's biometric information. Objections should be addressed to the Headteacher or Head of School.
- 7.2.6. For looked after pupils, the Local Authority will be notified and notification will also be sent to all those caring for the pupil.

Written consent will be obtained from at least one carer before the pupil's biometric data can be processed.

- 7.2.7. Even if a parent consents, the pupil themselves may object to the processing of their biometric data or refuse to cooperate with the biometric data collection or use. The pupil's objection/refusal takes precedent over the parents' consent.
- 7.2.8. If a pupil 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 pupil's biometric data is not taken or used as part of a biometric recognition system, irrespective of any consent given by the pupil's parent(s).
- 7.2.9. Parents and pupils can object to participation in the academy's biometric system(s) or withdraw their consent at any time. Where this happens, any biometric data relating to the pupil that has already been captured will be deleted.
- 7.2.10. Pupils will be informed, in writing, that they can object or refuse to allow their biometric data to be collected and used.

8. Alternative arrangements

- 8.1. Parents, pupils, staff members and other relevant adults have the right to not take part in the academy's biometric system(s).
- 8.2. 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. For example, where a biometric system uses a pupil's fingerprints to pay for school meals, the pupil will be able to use an alternative method of identification for the transaction instead.
- 8.3. 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 pupil's parents, where relevant).

9. Data retention

- 9.1. Biometric data will be managed and retained in line with the Trust's Data Retention Policy.

- 9.2. If an individual (or a pupil's parent, where relevant) withdraws their consent for their/their child's biometric data to be processed, it will be deleted from the academy's system.

10. Breaches

- 10.1. There are appropriate and robust security measures in place to protect the biometric data held by each academy.
- 10.2. Any breach to the school's biometric system(s) will be dealt with in accordance with the Data Breach Policy.

11. Additional uses of biometric data

- 11.1. In the event that an additional system is proposed which makes a new use of biometric data belonging to a data subject, a Data Protection Impact Assessment (DPIA) will be carried out.
- 11.2. If a major change is made to an existing system using biometric data, for example a change in the supplier of a cashless catering system, a DPIA will be carried out.
- 11.3. The Head of Data Protection must be consulted when a DPIA is undertaken.

12. Monitoring and review

- 12.1. The Trust Board's Audit and Risk Committee will review this policy on an annual basis.

Appendix 1: Parental notification and consent form for the use of biometric data

Dear [parent]

Re: Notification of intention to process pupils' biometric information and consent form

[Name of academy] wishes to use information about your child as part of an automated (i.e. electronically operated) recognition system. This is for the purposes of [specify what purpose is – e.g. catering, library access]. 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 of a child 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 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 and use this information for the purpose of providing your child with [specify the purpose].

The information will be used as part of an automated biometric recognition system. This 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. The template (ie. measurements taken from your child's fingerprint) is what will be used to permit your child to access services.

You should note that the law places specific requirements on schools when using personal information, such as biometric information, about pupils for the purposes of an automated biometric recognition system. For example:

- The academy cannot use the information for any purpose other than those for which it was originally obtained and made known to the parents.
- The academy must ensure that the information is stored securely.
- The academy must tell you what it intends to do with the information.
- Unless the law allows it, the academy cannot disclose personal information to another person/body – you should note that the only person/body that the academy wishes to share the information with is [insert any third party with

which the information is to be shared e.g. X supplier of biometric systems]. This is necessary in order to [say why it needs to be disclosed to the third party]

Providing your consent / objecting to the use of biometric data

In order to be able to use your child's biometric information, the written consent of at least one parent is required. However, consent given by one parent will be overridden if the other parent objects in writing to the use of their child's biometric information. Similarly, if your child objects to this, the academy must not collect or use their biometric information for inclusion on the automated recognition system. 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.

Please note that any consent, withdrawal of consent or objection from a parent must be in writing. Even if you have consented, your child can object or refuse at any time to their biometric information being taken/used. Your child's objection does not need to be in writing. We would appreciate it if you could discuss this with your child and explain to them that they can object to this if they wish. 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 [insert relevant service e.g. access school library].

If you give consent to the processing of your child's biometric information, please sign, date and return the enclosed consent form to the academy. Please note that when your child leaves the academy, or if for some other reason they cease to use the biometric system, their biometric data will be securely deleted.

Yours sincerely

Appendix 2: Consent Form for the Use of Biometric Information (Pupil)

Please complete this form if you consent to the academy taking and using information from your child's fingerprint by [name of academy] as part of an automated biometric recognition system. This biometric information will be used by [name of academy] for the purpose of [describe purpose(s) for which this data will be used, e.g. administration of academy library/canteen].

In signing this form, you are authorising the academy to use your child's biometric information for this purpose until they either leave the academy or cease to use the system. If you wish to withdraw your consent at any time, this must be done so in writing and sent to the academy at the following address:

[insert address]

Once your child ceases to use the biometric recognition system, his/her biometric information will be securely deleted by the academy.

Having read information provided to me by [name of academy], I give consent to information from the fingerprint of my child:

[name of child]

being taken and used by [name of academy] for use as part of an automated biometric recognition system for [describe purpose(s) for which this data will be used, e.g. administration of academy library/canteen].

I understand that I can withdraw this consent at any time in writing.

Name of parent: _____

Signature: _____

Date: _____

Please return this form to : [details]

Appendix 3: Notification and consent form for the use of biometric data (Staff/Other)

Dear [xxx]

Re: Notification of intention to process your biometric information and consent form

[Name of academy] wishes to use information about you as part of an automated (i.e. electronically operated) recognition system. This is for the purposes of [specify what purpose is – e.g. catering, library access]. The information from you that we wish to use is referred to as ‘biometric information’ (see next paragraph). Under the General Data Protection Regulations (GDPR) we are required to seek your explicit consent before being able to use your biometric information for an automated system.

Biometric information and how it will be used

Biometric information is information about a person that can be used to identify them, for example, information from their fingerprint. The academy would like to take and use information from your fingerprint and use this information for the purpose of providing you with [specify the purpose].

The information will be used as part of an automated biometric recognition system. This system will take measurements of your fingerprint and convert these measurements into a template to be stored on the system. An image of your fingerprint is not stored. The template (ie. measurements taken from your fingerprint) is what will be used to permit you to access services.

You should note that the law places specific requirements on schools when using personal information, such as biometric information, for the purposes of an automated biometric recognition system. For example:

- The academy cannot use the information for any purpose other than those for which it was originally obtained and made known to you.
- The academy must ensure that the information is stored securely.
- The academy must tell you what it intends to do with the information.
- Unless the law allows it, the academy cannot disclose personal information to another person/body – you should note that the only person/body that the academy wishes to share the information with is [insert any third party with which the information is to be shared e.g. X supplier of biometric systems].

This is necessary in order to [say why it needs to be disclosed to the third party]

Providing your consent / objecting to the use of biometric data

In order to be able to use your biometric information, we require your written consent. You can also object to the proposed processing of your 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.

Please note that any consent, withdrawal of consent or objection from you must be in writing.

If you do not wish your biometric information to be processed by the academy, the law says that we must provide reasonable alternative arrangements to enable you to still [insert relevant service e.g. access school library].

The academy is happy to answer any questions you may have.

If you give consent to the processing of your biometric information, please sign, date and return the enclosed consent form to the academy. Please note that when you leave the academy, or if for some other reason you cease to use the biometric system, your biometric data will be securely deleted.

Yours sincerely

Appendix 4: Consent Form for the Use of Biometric Information (Staff/Other)

Please complete this form if you consent to the academy taking and using information from your fingerprint by [name of academy] as part of an automated biometric recognition system. This biometric information will be used by [name of academy] for the purpose of [describe purpose(s) for which this data will be used, e.g. administration of academy library/canteen].

In signing this form, you are authorising the academy to use your biometric information for this purpose until you either leave the academy or cease to use the system. If you wish to withdraw your consent at any time, this must be done so in writing and sent to the academy at the following address:

[insert address]

Once you cease to use the biometric recognition system, your biometric information will be securely deleted by the academy.

Having read information provided to me by [name of academy], I give consent to information from my fingerprint being taken and used by [name of academy] for use as part of an automated biometric recognition system for [describe purpose(s) for which this data will be used, e.g. administration of academy library/canteen].

I understand that I can withdraw this consent at any time in writing.

Name: _____

Signature: _____

Date: _____

Please return this form to : [details]