



**Fulston Manor Academies Trust**

## **Biometric Data Policy**

**Fulston Manor School  
South Avenue Primary School**

**Version (Date):**

**July 2025**

**Review (Date):**

**July 2027**

**Member of Staff Responsible:**

**Mrs M Smith**

This is the Biometric Data Policy of Fulston Manor Academies Trust (trust) and is published in accordance with the Protection of Freedoms Act 2012 and the Data Protection Act 2018 (DPA) and sets how such data will be used by the trust.

## Biometric information

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. It is defined in the Data Protection Act (DPA) as "personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of an individual, which allows or confirms the unique identification of that individual, such as facial images or dactyloscopy data."

## Scope

Biometric information may be used for a range of applications and services. At present the trusts use of biometric information is limited to facilitating the administration of school meals. This system takes measurements of a person's fingerprints and converts these measurements into a template to be stored on our system. An image of the fingerprint is not stored. The template (i.e. measurements taken from the fingerprint) is what will be used to permit access to the service.

The trust may review and improve its administrative procedures or working practices in the future. If the solution involves the use of biometric information the trust will contact parents and guardians and seek their consent for the use of biometric information for any new and additional purpose to that already in place.

## Legal Basis

The Protection of Freedoms Act 2012 (sections 26 to 28), places specific requirements on schools and colleges when using personal information, such as biometric information, about students for the purposes of an automated biometric recognition system.

The use of the biometric system is by written consent and if consent is not available the trust will always ensure there is another means of providing access to the application or service. (Article 6 (1) (a) Data Protection Act 2018.

## Our Procedures

Under the DPA the trust must seek specific consent from a parent, student or a member of staff or a volunteer, including a Trust Member or Director, if it would be beneficial for the trust, school or the individual to provide such information.

A student may object or refuse to participate (or to continue to participate) in activities that involve the processing of their biometric data, and this objection or refusal overrides any parental consent to the processing.

A member of our administrative team contacts each parent or legal guardian by email seeking their written consent for their child to provide their biometric profile. This involves the pupil having their fingerprints taken by a digital reader operated by a trained member of staff. The data relating to each pupil is stored securely on the trust's server enabling automated verification and payment via a third party (BioStore).

If consent is refused the trust will ensure that the student's biometric data is not taken/used as part of a biometric recognition system or if taken destroyed following withdrawal of consent.

This Policy should be read in conjunction with the trust's Privacy Policy and Data Protection Policy.

Further information and guidance

"Protection of children's biometric information in schools: Guidance for schools, sixth-form colleges, 16 to 19 academies and further education institutions wishing to use automated biometric recognition systems."

<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools>

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