



Woodkirk  
Academy  
& Sixth Form

# Notification of Intention to Process Pupil's Biometric Information

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## 1. Introduction

- 1.1 At Leodis Academies Trust, Woodkirk Academy is the sole user of a biometric recognition system.
- 1.2 Woodkirk Academy uses a biometric recognition system to support the efficient and secure operation of school services, specifically:
  - Cashless catering for the purchase of food and drink
- 1.3 This Notice is provided in accordance with:
  - The Protection of Freedoms Act 2012
  - The UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018
- 1.4 No biometric data will be processed without appropriate consent being obtained separately.

## 2. What is Biometric Data?

- 2.1 Biometric data is personal information about an individual's physical characteristics that can be used to identify them, including fingerprints.
- 2.2 At Woodkirk Academy:
  - The system records a mathematical representation of a fingerprint
  - It does not store fingerprint images
  - The data stored cannot be reverse engineered to recreate a fingerprint
- 2.3 Biometric data used for identification purposes is classified as special category personal data and is subject to enhanced legal protection.

## 3. Purpose of Processing

- 3.1 The biometric system will be used solely to:
  - Identify pupils quickly and accurately
  - Enable access to the cashless catering system
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- 3.2 Biometric data will not be used for:
  - Identifying pupils quickly and accurately
  - Enabling access to the cashless catering system
  - Any other purpose beyond identification for catering services
- 3.3 The Academy has assessed the use of biometric identification as necessary and proportionate for this purpose, having considered alternative methods.

#### **4. Lawful Basis**

- 4.1 The Academy will only process biometric data where:
- Explicit consent has been obtained in accordance with UK GDPR; and
  - Requirements of the Protection of Freedoms Act 2012 have been met.

4.2 Biometric processing will not take place without this consent.

#### **5. Parental Notification Requirement**

5.1 This Notice is provided to ensure that parents/carers are fully informed:

- How biometric data is collected
- About how the data will be used
- About the rights available to pupils and parents

#### **6. Right to Refuse or Withdraw Consent**

6.1 Parents/carers and pupils have the right to:

- Refuse consent to biometric processing
- Withdraw consent at any time

6.2 If consent is refused or withdrawn:

- Biometric data will not be used
- Any previously collected biometric data will be securely deleted

6.3 A pupil's objection will be respected even where parental consent has been given, and the data will not be processed.

#### **7. Alternative Arrangements**

7.1 Where a pupil does not use the biometric system, Woodkirk Academy will provide an alternative method, such as:

- A cashless catering card or PIN-based system

7.2 These alternatives will:

- Provide equivalent access to services
- Not disadvantage the pupil in any way

#### **8. Data Security**

8.1 The Academy ensures that:

- Biometric data is stored securely
- Access is limited to authorised personnel
- Appropriate technical and organisational safeguards are in place

8.2 Where third-party systems are used, the Academy ensures that appropriate data protection and contractual safeguards are in place.

8.3 Biometric data is used only for the purpose stated and is not shared or reused for other activities.

## **9. Retention and Deletion**

9.1 Biometric data will be retained only while:

- The pupil is enrolled at the Academy; and
- Valid consent remains in place

9.2 Biometric data will be deleted:

- When consent is withdrawn
- When the pupil leaves the Academy

9.3 Deletion is carried out securely in accordance with the Trust's data retention procedures.

## **10. Data Controller**

10.1 Leodis Academies Trust is the Data Controller for the processing of biometric data at Woodkirk Academy.

## **11. Further Information**

11.1 Further details about how personal data is handled can be found in:

- Trust Data Protection Policy
- Privacy Notices (available via the Trust/Academy website)

## **12. Contact**

12.1 For any queries or concerns regarding biometric data processing, please contact:

- Academy Data Protection Lead: [woodkirkreception@woodkirk.leodis.org.uk](mailto:woodkirkreception@woodkirk.leodis.org.uk)
- Trust Data Protection Officer: [dpo@leodis.org.uk](mailto:dpo@leodis.org.uk)