



*Things done well make the best memories*  
**SIR NORTON KNATCHBULL – 1637**

# Biometrics Policy

Policy Owner	Ben Greene, Headteacher
Policy reviewed by	Judicium, DPO
EIA	Lena Seed, Governance & Compliance
Delegated authority	Finance & General Purposes Committee
Approved by Finance & General Purposes Committee	30 <sup>th</sup> January 2026
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## **What is biometric data?**

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.

All biometric data is considered to be special category data under the UK General Data Protection Regulation (UK GDPR). This means the data is more sensitive and requires more protection as this type of data could create more significant risks to a person's fundamental rights and freedoms.

This policy complies with The Protection of Freedoms Act 2012 (sections 26 to 28), the Data Protection Act 2018 and the UK GDPR.

The School has carried out a Data Protection Impact Assessment with a view to evaluating whether the use of biometric data is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the Data Protection Impact Assessment has informed the School's use of biometrics and the contents of this policy.

## **What is an automated biometric recognition system?**

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.

## **The Legal Requirements Under UK GDPR**

'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.

As biometric data is special category data, in order to lawfully process this data, the School must have a legal basis for processing personal data and a separate condition for processing special category data. When processing biometric data, the School rely on explicit consent (which satisfies the fair processing conditions for personal data and special category data). Consent is obtained by the school as part of the welcome pack sent to students and staff as they join the school.

The School processes biometric data as an aim to make significant improvements to the payments at the canteen and remove the need for cash. Cashless payment is known to decrease issues like personal theft and bullying.

## **Consent and Withdrawal of Consent**

The School will not process biometric information without the relevant consent.

### **Consent for pupils**

When obtaining consent for pupils, both parents/carers will be notified that the School intend to use and process their child's biometric information. The School only require written consent from one parent/carer (in accordance with the Protection of Freedoms Act 2012), provided no parent/carer objects to the processing.

If a parent/carer objects to the processing, then the School will not be permitted to use that child's biometric data and alternatives will be provided.

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).

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.

Pupils and parents/carers can also object at a later stage to the use of their child's/their biometric data. Should a parent/carer wish to withdraw their consent, they can do so by e-mailing to the School at [catering@nks.kent.sch.uk](mailto:catering@nks.kent.sch.uk) requesting that the School no longer use their child's biometric data.

Pupils who wish for the School to stop using their biometric data do not have to put this in writing but should let the catering staff know.

The consent will last for the time period that your child attends the School (unless it is withdrawn).

### **Consent for staff**

The School will seek consent of staff before processing their biometric data. 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 e-mailing [catering@nks.kent.sch.uk](mailto:catering@nks.kent.sch.uk)

The consent will last for the time period that the staff member remains employed by the School (unless it is withdrawn).

## **Current use of Biometric Data**

The schools use biometric data at the canteen to authenticate users at the time of purchase.

## **Ownership and Use**

The school has ownership of the data and must make sure old accounts get deleted (after any overdue payments have been claimed back by the catering company). The school supports the catering company regarding user imports and biometrics import and make sure the catering staff has adequate training.

The catering company uses the Biometrics data and can register and delete biometrics data as part of the enrolment process.

### **Retention of Biometric Data**

The Biometrics retention policy is in accordance with the school's Data Retention policy.

Biometric data will be stored by the School for as long as consent is provided (and not withdrawn).

Once a pupil or staff member leaves, the biometric data will be deleted from the School's system no later than 72 hours.

### **Storage of Biometric Data**

At the point that consent is withdrawn, the School will take steps to delete their biometric data from the system and no later than 72 hours. The deletion is done with an "anonymizer" tool that deletes all data for leavers including photos and biometrics data.

Biometric data will be kept securely, and systems will be put in place to prevent any unauthorised or unlawful access/use.

The biometric data is only used for the purposes for which it was obtained, and such data will not be unlawfully disclosed to third parties.

## **Appendix 1 – Biometric Consent Form (parent/carer) - Recorded on Arbor**

Please confirm your consent to the school taking and using information from your son/daughter's fingerprint as part of an automated biometric recognition system. This biometric information will be used by the school for the purpose of charging for school meals.

In signing this consent, you are authorising the school to use your son/daughter's biometric information for this purpose until they either leave the school or ceases to use the system.

If you wish to withdraw your consent at any time, this must be done so in writing and sent to [catering@nks.kent.sch.uk](mailto:catering@nks.kent.sch.uk)

Once your son/daughter ceases to use the biometric recognition system, their biometric information will be securely deleted by the catering company no later than 72 hours.

Please note that pupils can object or refuse to allow their biometric data to be taken/used and if they do this, we will provide them with an alternative method of accessing relevant services. This will be discussed with you or your child (depending on their age and their understanding of their data rights) within school. However, we would encourage you to also discuss this with your child at home to ensure that they are aware of their right to refuse or to change their mind at any time.

For further information on the processing of biometric data, please see our Biometrics policy which is available in the school policies section on the school website.

### **Parental/carers Consent:**

**Having read the above guidance information, I give consent to information from the fingerprint of my son/daughter being taken and used by the school for use as part of an automated biometric recognition system.**

**I understand that I can withdraw this consent at any time.**

**Appendix 2 – Biometric Consent Form (staff)**

Please sign below if you consent to the school taking and using your fingerprint information as part of an automated biometric recognition system. This biometric information will be used by the school for the purpose of charging for school meals.

In signing this form, you are authorising the school to use your biometric information for this purpose until you either leave the school 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 [tnks@culinera.co.uk](mailto:tnks@culinera.co.uk)

Should you wish to obtain further information on the processing of biometric data, please see our Biometrics Policy.

For further information on the processing of biometric data, please see our Biometrics policy which is available in the school policies section on the school website.

**Staff Consent:**

Having read the above guidance information, I give consent to information from my fingerprint being taken and used by the school for use as part of an automated biometric recognition system.

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

<p><b>Staff Name:</b></p> <p>.....</p> <p><b>Signature:</b></p> <p>.....</p> <p><b>Date:</b></p> <p>.....</p> <p><b>Please return a copy of this consent to the school office.</b></p>
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## NKS – Equality Impact Assessment (EIA)

The purpose of an Equality Impact Assessment (EIA) is to ensure that policies, procedures, or decisions do not create unnecessary barriers for individuals with protected characteristics under the Equality Act 2010. Where potential negative impacts are identified, these should be eliminated or minimised, and opportunities for positive impact should be considered.

### POLICY STATUS

Update of existing policy to reflect current statutory guidance

### THIS POLICY WILL AFFECT

- Pupils
- Staff
- Parents / carers

**EIA completed by:** Lena Seed, Governance & Compliance Professional

**Contributors to EIA:** None

**Date completed:** January 2026

*(This EIA has been reviewed and confirmed as current at the point of policy approval.)*

### IMPACT ANALYSIS

Protected characteristic	Positive impact	Neutral impact	Negative impact	Why will the policy have this effect?
Sex	✓			<i>The policy applies equally to all individuals and requires explicit consent before biometric data is processed, ensuring fairness and lawful handling.</i>
Race	✓			<i>Biometric data is processed uniformly and does not involve differential treatment based on racial or ethnic characteristics.</i>
Religion or belief	✓			<i>The policy allows individuals to refuse or withdraw consent and provides reasonable alternatives, ensuring that religious or belief-based objections are respected.</i>
Sexual orientation	✓			<i>No personal characteristics are used in determining access to services; biometric data is processed solely for identification purposes with consent.</i>
Gender reassignment	✓			<i>Highly sensitive biometric data is protected through strict access controls, consent requirements, and rapid deletion when no longer required.</i>
Pregnancy or maternity		✓		<i>The policy does not affect employment rights, access to services, or decision-making related to pregnancy or maternity.</i>
Age	✓			<i>Specific safeguards are in place for pupils, including parental notification, the right of the child to object, and provision of alternatives in line with the Protection of Freedoms Act 2012.</i>
Disability	✓			<i>Reasonable alternatives are provided for individuals who cannot or choose not to use biometric systems, ensuring accessibility and inclusion.</i>
Marriage or civil partnership		✓		<i>This characteristic is not relevant to the processing or use of biometric data.</i>

### Other relevant groups (non-protected characteristics)

- English as an additional language

- Looked-after children
- Families with separated parents

**Impact:** Positive

*The consent-based approach, clear communication, and availability of alternatives ensure that no group is disadvantaged in accessing school services.*

#### **INTERSECTIONAL IMPACT**

No adverse intersectional impacts have been identified.

*The policy includes safeguards, professional oversight, and alternative arrangements to ensure individuals with multiple protected characteristics are not disadvantaged.*

#### **OUTCOMES**

The Equality Impact Assessment has determined that the Biometrics Policy:

- does not create barriers for individuals with protected characteristics;
- includes appropriate safeguards through explicit consent, the right to object, and the provision of reasonable alternatives; and
- supports equality, dignity, and privacy in the processing of biometric data.

No adverse impacts have been identified, and no mitigating actions are required at this time. The policy will continue to be monitored through the normal review cycle to ensure ongoing compliance with equality duties and statutory guidance.

#### **CONSULTATION AND STAKEHOLDER ENGAGEMENT**

No specific stakeholder consultation was required due to the statutory and operational nature of the policy.

*The policy reflects legal requirements under the Protection of Freedoms Act 2012, UK GDPR, and Data Protection Act 2018, and has been reviewed by the School's Data Protection Officer.*

#### **FINAL DECISION ON POLICY**

The policy does not require revision as a result of this Equality Impact Assessment.

#### **MONITORING ARRANGEMENTS**

The use of biometric data, consent arrangements, and retention practices are reviewed in line with the policy review cycle. Revisions to ICO guidance, safeguarding expectations, or statutory requirements will trigger an earlier review if required.