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| <b>POLICY</b>                      | <b>Biometric Data Policy</b>         |
| <b>STATUS/DATE OF THIS VERSION</b> | <b>July 2026</b>                     |
| <b>APPROVED BY</b>                 | <b>Board of Trustees</b>             |
| <b>RATIFIED BY</b>                 | <b>Board of Trustees – July 2026</b> |
| <b>REVIEW</b>                      | <b>July 2027</b>                     |

This policy is operated by all the schools in Unity Education Trust (as listed below).  
**There may be sections that are specific to one school and these will be added by the school either as an annex or in place of yellow highlighted sections below.**

**Any queries about the policy should be directed, in the first instance, to the Headteacher/Head of School:**

- **Beeston Primary**
- **Garvestone Primary**
- **Grove House Infant**
- **Kings Park Infant**
- **Northgate High School and Dereham Sixth Form College**
- **UET Pathfinder Douglas Bader Academy**
- **UET Compass Belton Academy**
- **The Pinetree School**
- **Churchill Park**
- **Greyfriars Primary**
- **Highgate Infant School**
- **Kings Oak Infant School**
- **Wimbotsham and Stow Primary**
- **Magdalen Primary**
- **St Germans Primary**

### **1. 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, hand measurements, and spoken voice.

The Information Commissioner considers all biometric information to be personal data as defined by the General Data Protection Regulation; this means that it must be obtained, used, and stored in accordance with that Regulation.

The Protection of Freedom Act 2012 includes provisions which relate to the use of biometric data in schools and colleges when used as part of an automated biometric recognition system. These provisions are in addition to the requirements of the General Data Protection Regulation.

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

An automated biometric recognition system uses technology which measures an individual's physical or behavioural characteristic 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 to recognise or identify the individual.

Biometric recognition systems can use many kinds of physical or behavioural characteristics such as those listed in 1 above.

### **3. What does processing data mean?**

'Processing' of biometric information includes obtaining, recording, or holding the data or conducting any operation or set of operations on the data, including (but not limited to) disclosing it, deleting it, organising it or altering it. An automated biometric recognition system processes data when:

- a) Recording a persons' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner.
- b) Storing biometric information on a database system; or
- c) Using that data as part of an electronic process, for example, by comparing it with biometric information stored on a database to identify or recognise individuals.

#### **4. Who can give consent?**

The Data Protection Act gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around the age of 13. For this reason, for most children in secondary school, it will normally be up to the individual child to decide whether to provide biometric data.

Where the school considers that the child does not have the capacity or they are under the age of 13, parents/carers will be asked to provide consent.

The school is required to notify each parent/carer of a child whose biometric information they wish to collect/use. If either parent/carer objects in writing, then the school will not be permitted to take or use the child's biometric data.

In no circumstances can a child's biometric data be processed without written consent. Schools must not process the biometric data of a student where:

- a) The child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
- b) A parent or student has not consented in writing to the processing; or
- c) A parent or student has objected in writing to such processing, even if another parent has given written consent.

Staff must consent before any biometric data can be taken or used.

#### **5. Length of consent**

The original written consent is valid until such time as it is withdrawn. However, it can be overridden, if at any time either parent, child themselves or member of staff objects to the processing (subject to the objection being in writing).

When the student/staff member leaves the school, their biometric data will be securely removed from the school's biometric recognition system.

#### **6. Alternative to Biometric**

The school cashless catering system allows for an alternative to biometric scanning and any student or staff member objecting to the processing of their biometric data will be issued with a PIN code.



### **Biometric Consent form (parent/carer)**

**Student name:** .....

Please sign below if you consent to the Academy 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 Academy for the purpose of charging for school meals. In signing this form, you are authorising the Academy to use your son/daughter's biometric information for this purpose until he/she either leaves the Academy 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 the Principal. Once your son/daughter ceases to use the biometric recognition system, his/her biometric information will be securely deleted by the Academy.

Parent 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 Academy for use as part of an automated biometric recognition system for the purchase of school meals. I understand that I can withdraw this consent at any time in writing.

#### **Parent**

**Name:** .....

**Signature:** .....

**Date:** .....



### **Biometric Consent form (student)**

Student name: .....

Please sign below if you consent to the Academy taking and using information from your fingerprint as part of an automated biometric recognition system. This biometric information will be used by the Academy for the purpose of charging for school meals. In signing this form, you are authorising the Academy to use your biometric information for this purpose until you either leave the Academy 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 the Principal. Once you cease to use the biometric recognition system, your biometric information will be securely deleted by the Academy.

#### **Student consent:**

Having read the above guidance information, I give consent to information from my fingerprint being taken and used by the Academy for use as part of an automated biometric recognition system for the purchase of school meals. I understand that I can withdraw this consent at any time in writing.

Name:.....

Signature:.....

Date: .....



**Biometric Consent form (staff)**

**Staff name:** .....

Please sign below if you consent to the Academy taking and using information from your fingerprint as part of an automated biometric recognition system.

This biometric information will be used by the Academy for the purpose of charging for school meals. In signing this form, you are authorising the Academy to use your biometric information for this purpose until you either leave the Academy 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 the Principal.

Once you cease to use the biometric recognition system, your biometric information will be securely deleted by the Academy.      Staff consent:

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

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

Name: .....

Signature:.....

Date:.....