QUEEN ELIZABETH'S GRAMMAR
SCHOOL FAVERSHAM

BIOMETRICS DATA POLICY

Policy adopted by Currculum Committee on 13th March 2025 to be reviewed in 2026

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 and 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 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 via the Arbor or Aplicaa apps.

The school process biometric data as an aim to make significant improvements to our canteen and lunch facilities. This is to ensure efficiency, to do away with the need for cash to be used.

Consent and withdrawal of consent

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

Consent for students

When obtaining consent for students, parents 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 (in accordance with the Protection of Freedoms Act 2012) provided no parent objects to the processing.

If a parent objects to the processing, then the school will not be permitted to use that student's biometric data and an alternative will be provided in the form of either a card or a manual entry check by canteen staff on the system.

The student may also object to the processing of their biometric data. If a student 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 either a card or a manual entry check by canteen staff on the system, which will allow the student to access the canteen facilities in the way that they would have had access had their biometrics been used.

Parents can also object at a later stage to the use of their child's biometric data. Should a parent wish to withdraw their consent, they can do so by writing to the school at office@queenelizabeths.kent.sch.uk requesting that the school no longer use their child's biometric data.

Students who wish for the school to stop using their biometric data do not have to put this in writing but should let the School Office know.

The consent will last for the time period that the student attends the school (unless it is withdrawn).

Consent for staff

The school will seek consent of staff before processing their biometric data via the Arbor App. Staff who do not wish to have their biometric data captured will instead by offered the facility to pay via contactless or via card.

Staff who wish for the school to stop using their biometric data should simply update their preferences in the Arbor App and their data will be deleted within the following 72 hours, otherwise consent will last for the time period that the staff member remains employed by the school (unless it is withdrawn).

Retention of Biometric Data

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

Once a student or staff member leaves, the biometric data will be deleted from the school system no later than 72 hours after.

Storage of Biometric Data

At the point that consent is withdrawn, the school will take steps to delete the biometric data from the system and no later than 72 hours after.

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.

Signed _____
(Chair of Governors)

Date _____