

Biometric Data Policy and Consent – September 2026

We do not currently use any biometric processes in this school and would not consider doing so without obtaining written parental consent before starting to use this technology.

Biometric data:

Biometric data means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allows or confirms the unique identification of that natural person, such as facial images or dactyloscopic (fingerprint) data.

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.

Under the General Data Protection Regulation (GDPR), personally identifiable biometric data is defined as "special category" personal data and therefore explicit consent is required from an individual to use biometric data. The Information Commissioner considers all biometric information to be sensitive personal data as defined by the GDPR 2018; this means that it must be obtained, used and stored in accordance with the Regulation.

The Protection of Freedoms 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 GDPR 2018.

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. An automated biometric recognition system processes data when:

- a) Recording pupils' biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
- b) Storing pupils' 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 in order to identify or recognise pupils.

Before the implementation of a system that collects Biometric Data, Schools must carry out a Data Protection Impact Assessment (DPIA).

Where the data is to be used as part of an automated biometric recognition system, schools must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.

The School must ensure that each parent of a child is notified of the intention to use the child's biometric data as part of an automated biometric recognition system. The written consent must be obtained from parents/carers before the data is processed from the child. Under no circumstances can a child's biometric data be processed without written consent.

Schools cannot process the biometric data of a pupil (under 18 years of age) where:

- a) The child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
- b) No parent has consented in writing to the processing; or
- c) A parent has objected in writing to such processing, even if another parent has given written consent.

The School must provide a reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system. The alternative arrangement will ensure that students do not suffer any disadvantage or difficulty in accessing services / school premises etc. as a result of their not participating.

When a student leaves school all data relating to their biometric will be permanently deleted.

My signature below signifies that I understand the Biometric Data Policy and authorise Burradon Community Primary School to use biometric data as outlined above.

Consent will continue while the student attends Burradon Community Primary School or until such time that a written request has been made to withdraw consent.

Student Name: _____

Parent/Guardian Signature: _____

Date: _____

Parent/Guardian Name: _____