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Protection of Biometric Information of Children in Schools September 2026

Information Governance (IG) Services.

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YourIG

Dudley Metropolitan Borough Council

YourIG – Introduction

This briefing is based on non-statutory advice from the Department for Education. It explains the legal duties schools have if they wish to use biometric information about pupils for the purposes of using automated biometric recognition systems.

Schools using automated biometric recognition systems, or planning to install them, should make arrangements to notify parents and obtain the consent required under the duties set out in this briefing. There are no circumstances in which a school can lawfully process a pupil's biometric data without having notified each parent of a child and received the necessary consent.

What legislation does this advice relate to?

The Protection of Freedoms Act 2012 includes provisions which relate to the use of biometric data in schools when used as part of an automated biometric recognition system.

The UK General Data Protection Regulation (UK GDPR) defines biometric data as 'special category' personal information

What is biometric data?

Article 4 of the UK General Data Protection Regulation (UK GDPR) defines biometric information as *'personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person which allow or confirm the unique identification of the natural person'*.

This can include fingerprints, facial shape, retina and iris patterns, and hand measurements.

How are biometric technologies used in schools?

Biometric technologies in schools are used to borrow library books, for cashless canteen systems, vending machines, recording class attendance and payments into schools.

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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 it is a match in order to recognise or identify the individual.

What does processing data mean?

'Processing' of biometric information means any operation or set of operations which is performed on personal data including obtaining, recording, e.g. taking measurements of a finger print, storing data, e.g. storing pupils' biometric information on a database system.

Is consent required?

Schools must notify each parent of a pupil under the age of 18 if they wish to take and subsequently use the child's biometric data as part of an automated biometric recognition system.

As long as the child or a parent does not object, the written consent of only one parent will be required for a school to process the child's biometric information. A child does not have to object in writing but a parent's objection must be written.

There will never be any circumstances in which a school or college can lawfully process a child's biometric information (for the purposes of using an automated biometric recognition system) without having written consent

The pupil's right to refuse

If a pupil under 18 objects or refuses to participate (or to continue to participate) in activities that involve the processing of their biometric data, the school must ensure that the pupil's biometric data are not taken/used as part of a biometric recognition system. A pupil's objection or refusal overrides any parental consent to the processing.

Also note:

2) Schools should take steps to ensure that pupils understand that they can object or refuse to allow their biometric data to be taken/used and that, if they do this, the school will have to provide them with an alternative method of accessing relevant services. The steps taken by schools to inform pupils should take account of their age and level of understanding. Parents should also be told of their child's right to object or refuse and be encouraged to discuss this with their child.

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3) In addition to the required actions for notification and obtaining consent, schools may wish to include information in their privacy notices and explain how biometric data is to be processed and stored by the school.

Privacy Notice

The Privacy Notice should include information about the processing of their child's biometric information that is sufficient to ensure that parents are fully informed about what is being proposed. This should include:

- contact details of the organisation using biometric data;
- details about the type of biometric information to be taken;
- how it will be used;
- any retention periods
- and the school's duty to provide reasonable alternative arrangements for those pupils whose information cannot be processed.

Suggested text for a notification letter and consent form for schools to use to notify parents of their plans to collect and use biometric data can be found below. Schools may wish to adapt this text in light of their own particular systems but should ensure that parents are made aware of the school's requirements as set out in sections 26-28 of the Protection of Freedoms Act 2012 http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted

Is a Data Protection Impact Assessment (DPIA) needed?

The Information Commissioner requires that a DPIA is carried out where you plan to process special category information on a large scale and where you process biometric data.

Where a school has already implemented a biometric recognition system and there is evidence that:

- consultation with parents was undertaken
- an appropriate privacy notice was provided to parents and pupils
- the correct consent was obtained

there is no requirement for a DPIA to be undertaken retrospectively.

If the school is considering the introduction of a new biometric system a DPIA will need to be completed before any type of processing is undertaken.

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Further information and guidance

This can be found via the following links:

Department for Education's *'Protection of Biometric Information of Children in Schools – Advice for proprietors, governing bodies, head teachers, principals and school staff'*:

ICO guide to data protection for organisations: Guide to data protection | ICO