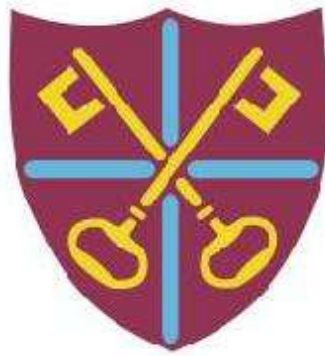




Protection of biometric information of pupils in school

St Peter's Catholic Primary School

Approved by:	Local Governing Committee	Date: 7 th September 2026
Last reviewed on:	Autumn 2026	
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St Peter's does not use any biometric information about pupils for the purposes of using automated biometric recognition systems, nor is there any plan to install them.

1. Legislation and statutory guidance

Schools that process pupils' biometric data must do so with appropriate care and in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the data protection principles set out within that legislation. The school will ensure that all biometric data is collected, processed, stored, retained and destroyed lawfully, fairly, transparently and securely.

Where biometric data is used as part of an automated biometric recognition system, the school will also comply with the requirements of sections 26 to 28 of the Protection of Freedoms Act 2012, including providing the required notifications, obtaining the necessary consent, respecting a pupil's right to refuse participation and providing an appropriate alternative method where biometric recognition is not used.

Schools must ensure that each parent of a child is notified of the school's intention to use the child's biometric data (see 2.1 below) as part of an automated biometric recognition system.

The written consent of at least one parent must be obtained before the data is taken from the child and used (i.e. 'processed' – see 2.3 below). This applies to all pupils in schools and colleges under the age of 18. In no circumstances can a child's biometric data be processed without written consent.

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

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

Schools and colleges must provide reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system.

2. Biometric Data and Processing

2.1. What is biometric data?

1. 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.
2. All biometric information is considered personal data under the UK GDPR and the Data Protection Act 2018. This means that it must be collected, used, stored and disposed of in accordance with data protection legislation and relevant Department for Education guidance
3. The Protection of Freedoms Act 2012 includes specific requirements relating to the use of pupils' biometric data where it is processed as part of an automated biometric recognition system. These requirements operate alongside the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The school will ensure that any biometric data is processed lawfully, fairly and transparently and in accordance with all applicable legislation and Department for Education guidance.

2.2. What is an automated biometric recognition system?

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

2.3. What does processing data mean?

'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.

3. Monitoring arrangements

This policy will be reviewed **annually** by the Headteacher. At every review, it will be approved by the Local Governing Committee.