Pathways School

Protection of Biometric Information of Children

Policy Monitoring

Date policy last reviewed: January 2026

Signed by:

Neil Jones	Headteacher	Date:	January 2026
Saima Ali	Chair of governors	Date:	January 2026

Date of next review: January 2027

This policy will be reviewed at least annually and following any concerns and/or updates to national/local guidance or procedure.

1. Introduction

Schools using automated biometric recognition systems, or planning to install them, should make arrangements to notify parents and obtain the consent required. Pathways School does not use and does not currently have any plans to introduce an automated biometric recognition system.

2. Legislation

- The Protection of Freedoms Act 2012
- The Data Protection Act 2018

3. Links to other school policies and practices.

- Equality and Diversity Policy
- Privacy Policy
- Safeguarding and Child Protection Policy
- Staff Code of Conduct

4. Key Points

- Schools that use pupils' biometric data must treat the data collected with appropriate care and must comply with the data protection principles as set out in the Data Protection Act 1998.
- Where the data is used as part of an automated biometric recognition system, schools and colleges must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.
- Schools must ensure that each parent of a child is notified of the school's intention to use the child's biometric data 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. 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: 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.
- Schools must provide reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system.

5. Definitions

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.

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.