

email: contact@biometricscommissioner.scot

Date: 25 June 2026

Sent by e-mail only.

Dear Requester,

Request for Information – FOI/011

We acknowledge your request for the following information:

- Whether the Commissioner has been consulted by the Scottish Government, the Improvement Service, or any local authority regarding any proposal to expand the functionality of the National Entitlement Card (NEC) beyond its current uses (concessionary travel, Young Scot, proof of age). If so, a copy of any consultation correspondence or the Commissioner's response.
- Whether the Commissioner has published or prepared any guidance, advice, or position paper on the use of multi-purpose identity or entitlement cards by Scottish public bodies, and if so, a copy of that material.
- Whether the Commissioner has assessed any biometric implications (including but not limited to photographic image storage) arising from the NEC scheme's current Card Management System or any proposed expansion of it.

Your request was received on 23 June 2026 date and has been handled in accordance with the Freedom of Information (Scotland) Act 2022 (FOI(S)A)

Responding to each part of your request the position is as follows:

The Commissioner has not been consulted by the Scottish Government, the Improvement Service or any local authority regarding any proposal to expand the functionality of the National Entitlement Card (NEC) beyond its current use (concessionary travel, Young Scot, proof of age).

The Commissioner does not prepare guidance on any matter that does not pertain to the use of biometric data or technologies for policing and criminal justice purposes and is not involved in the NEC scheme.

In keeping with our FOI procedures, this information may also be posted on the Scottish Biometric Commissioner's disclosure log.

Annex A

REQUESTS MADE UNDER THE FREEDOM OF INFORMATION (SCOTLAND) ACT 2002

How we handle FOI requests

Information on how we handle FOI requests is available on the Scottish Biometric Commissioners website at: [Scottish Biometrics Commissioner | Privacy Notice | Scottish Biometrics Commissioner](#)

Review

If you are dissatisfied with the way in which we have dealt with your request for information, you can ask us to review our decision and actions. You must do this in writing (or other permanent form) within 40 working days of the date of this letter, stating the reasons for your dissatisfaction, and we will respond within 20 working days of receipt. A request for a review should be made to the Commissioner:

Post: Scottish Biometrics Commissioner
Bridgeside House
99 McDonald Road
Edinburgh
EH7 4NS

E-mail: contact@biometricscommissioner.scot

Application to the Scottish Information Commissioner

If, on the outcome of any review, you are still dissatisfied, or if we are unable to resolve any other complaint, then you can contact the Scottish Information Commissioner:

Post: The Office of the Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
Fife
KY16 9DS

Email: www.itspublicknowledge.info/Appeal

Telephone: 01334 464610

Website: www.itspublicknowledge.info

A decision by the Scottish Information Commissioner may be appealed on a point of law to the Court of Session.

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Feedback or comment

We would welcome feedback or comment on how we handled your request. Please contact the Business Support Officer at contact@biometricscommissioner.scot.

Data Protection

If you wish to find out more about how we use your personal data then you can access our Privacy Notice at the following link: [Scottish Biometrics Commissioner | Privacy Notice | Scottish Biometrics Commissioner](#)

How to contact us

Post: Scottish Biometrics Commissioner
Bridgeside House
99 McDonald Road
Edinburgh
EH7 4NS

Telephone: 0131 2021043

E-mail: contact@biometricscomssioner.scot