

NOTIFICATION OF INTENTION TO PROCESS PUPILS' BIOMETRIC INFORMATION

All Saints' Catholic Academy wishes to use information about your child as part of an automated (i.e., electronically operated) recognition system. This is for the purposes of catering and providing cashless catering services. The information from your child that we wish to use is referred to as 'biometric information' (see next paragraph). Under the Protection of Freedoms Act 2012 (sections 26 to 28), we are required to notify each parent/carer of a child and obtain the written consent of at least one parent/carer before being able to take and use a child's biometric information for an automated system.

Biometric information and how it will be used

Biometric information is information about a person's physical or behavioural characteristics that can be used to identify them, for example, information from their fingerprint. We would like to take and use information from your child's fingerprint and use this information for the purpose of providing your child with cashless catering services.

The information will be used as part of an automated biometric recognition system. This system will take measurements of your child's fingerprint and convert these measurements into a template to be stored on the system. An image of your child's fingerprint is not stored. The template (i.e., measurements taken from your child's fingerprint are used to permit your child to access services).

You should note that the law places specific requirements on schools when using personal information, such as biometric information, about pupils for the purposes of an automated biometric recognition system.

For example:

- a) the school cannot use the information for any purpose other than those for which it was originally obtained and made known to the parent(s) (i.e., as stated above);
- b) the school must ensure that the information is stored securely;
- c) the school must tell you what it intends to do with the information;
- d) unless the law allows it, the school/college cannot disclose personal information to another person/body – you should note that the only person/body that the school/college wishes to share the information with is the school catering company, Aspens Services Ltd, Ground Floor, Teme House, Whittington Road, Whittington, Worcester, WR5 2RY who have access to the information for the purpose of taking cash less payments for school meals.

Providing your consent/objecting

As stated above, in order to be able to use your child's biometric information, the written consent of at least one parent/carer is required. However, consent given by one parent/carer will be overridden if the other parent/carer objects in writing to the use of their child's biometric information. Similarly, if your child objects to this, the school cannot collect or use his/her biometric information for inclusion on the automated recognition system.

You can also object to the proposed processing of your child's biometric information at a later stage or withdraw any consent you have previously given. This means that, if you give consent but later change your mind, you can withdraw this consent. Please note that any consent, withdrawal of consent or objection from a parent/carer must be in writing.

Even if you have consented, your child can object or refuse at any time to their biometric information being taken/used. [His/her] objection does not need to be in writing. We would appreciate it if you could discuss this with your child and explain to them that they can object to this if they wish. The school is also happy to answer any questions you or your child may have.

If you do not wish your child's biometric information to be processed by the school, or your child objects to such processing, the law says that we must provide reasonable alternative arrangements for children who are not going to use the automated system to access cashless catering services.

Attached is a reply slip for parents/carers to please sign, date and return to the school indicating whether you:

a) give consent to the processing of your child's biometric information

or whether you

b) withhold consent.

Please note that, where consent has been given, when your child leaves the school, or if for some other reason he/she ceases to use the biometric system, his/her biometric data will be securely deleted.

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':

<https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools>

ICO guide to data protection for organisations:

<https://ico.org.uk/for-organisations/guide-to-data-protection>

ICO guidance on data protection for education establishments:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/right-of-access/education-data/>

PARENT/CARER REPLY SLIP: BIOMETRIC INFORMATION

Please complete this form to indicate **whether you**

a) **give consent** to the processing of your child's biometric information,

or, whether you

b) **withhold consent**

a) Consent GIVEN	Having read guidance provided to me by All Saints' Catholic Voluntary Academy, I GIVE CONSENT to information from the fingerprint of my child to be taken and used by the school as part of an automated biometric recognition system for access to the school's cashless catering system. I understand that I can withdraw this consent at any time in writing.
Name of Student	
Student DOB	
Name of Parent/Carer	
Signature of Parent/Carer	
Date	

Once your child ceases to use the biometric recognition system, his/her biometric information will be securely deleted by the school/college. If you wish to withdraw your consent at any time, this must be done so in writing and sent to the school at the following address:
All Saint Catholic Voluntary Academy, Broomhill Lane, Mansfield, Nottinghamshire, NG19 6BW

b) Consent WITHHELD	Having read guidance provided to me by All Saints' Catholic Voluntary Academy, I DO NOT GIVE CONSENT to information from the fingerprint of my child to be taken and used by the school as part of an automated biometric recognition system for access to the school's cashless catering system. I understand that I can give consent at any time by writing to the school.
Name of Student	
Student DOB	
Name of Parent/Carer	
Signature of Parent/Carer	
Date	

Please return this form to:

School Administration
All Saints Catholic Voluntary Academy
Broomhill Lane
Mansfield
NG19 6BW