

NOTIFICATION OF INTENTION TO PROCESS PUPILS' BIOMETRIC INFORMATION

Dear Parent/Carer

Hope Valley College wishes to use information about your child as part of an automated (i.e. electronically-operated) recognition system. This is for the purposes of cashless catering for the school meals system. 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 of a child and obtain the written consent of at least one parent before being able to 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/iris/palm]. The school would like to take and use information from your child's fingerprint and use this information for the purpose of providing a cashless catering system for school meals.

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) is what will be used to permit your child to access services.

You should note that the law places specific requirements on schools and colleges 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 cannot disclose personal information to another person/body – you should note that the only person/body that the school wishes to share the information with is the party directly involved with the implementation of the system – CRB Cunninghams Ltd & Wisepay Software Services.

This may be necessary in order for CRB Cunninghams to remotely connect to the school to assist with maintenance routines, imports etc and Wisepay Software Services to provide the service of payment collection for the cashless catering service.

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 is required. However, consent given by one parent will be overridden if the other parent objects in writing to the use of their child's biometric information. Similarly, if your child objects to this, the school cannot 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 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 the cashless catering system.

If you give consent to the processing of your child's biometric information, please enter the statement on Question 29 as requested on the Form emailed to your inbox.

Please note that 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':

<http://www.education.gov.uk/schools/adminandfinance/schooladmin>.

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

ICO guidance on data protection for education establishments: Education