

Biometric Data Processing: Information and Consent

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 to provide your child with secure and easy access to services at the school such as Cashless Catering, Printing, Library services and door security.

The automated biometric recognition system will take measurements of your child's finger and convert these measurements into a unique template to be stored on the system. A physical image of your child's finger is not stored, neither can the fingerprint be reconstructed from the template. When your child used the system to access services, the measurements of their fingerprint will be matched to their unique template and access to the service will be granted.

The law places specific requirements on schools when using personal information, such as biometric information about pupils for an automated recognition system. For example:

- a) the school cannot use the biometric data for any purpose other than those for which it was originally obtained and made known to the parent(s), without further notification of the purpose and specific consent being sought.
- 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 organisation the school will share the information with is Cunningham's, our contracted service provider. This is necessary to allow the company to support the software used to process the biometric information.

Providing your consent/objecting

As stated above, 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 the processing of their biometric data, the school cannot collect or use their biometric information for inclusion on the automated biometric recognition system.

You may also object to the processing of your child's biometric information at a later stage or withdraw any consent you have previously given at any time. 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 to the processing, your child can object to or refuse to engage with the processing of their biometric data at any time. A child's objection does not need to be in writing. It may be verbal or non-verbal (e.g., refusal to engage with the data gathering process).

To ensure your child is aware of their rights we would appreciate it if you would discuss this with your child and explain to them that they may object if they wish to do so.

The school is also happy to answer any questions you or your child may have.

Alternative access to service provision

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 access arrangement. The alternative is that your child will be issued with a card to access these services.

Data Retention

Please note that when your child leaves the school, or if for some other reason they cease to use the biometric system, their biometric data will be securely deleted.

Further information and guidance

We hope that by introducing biometric systems it will be much easier for both students and staff to go about their daily business in school.

Further information and guidance regarding the use of Biometric data in schools can be found via the following links:

Department for Education's *'Protection of Biometric Information of Children in Schools - Advice for proprietors, governing bodies, headteachers, principals and school staff'*:

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

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/education>