



Use of Biometric Information

Revised 31 August 2021

GUIDANCE DOCUMENT FOR PARENTS/CARERS

Regarding CONSENT TO PROCESS BIOMETRIC INFORMATION (FINGER ID)

Consent to Process Your Child's Biometric Information

In order to meet the requirements of the General Data Protection Regulation (GDPR) - the governing legislation for collecting and storing personal data in the EU - we need to seek your consent for The Bulwell Academy's cashless catering system.

The 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 restaurant services. The information 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 parents/carers and obtain written consent before being able to use their 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 finger ID. The Academy would like to take and use information from your child's biometric finger ID and use this information for the purpose of providing your child with restaurant services.

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

For example:

- (a) the Academy cannot use the information for any purpose other than those for which it was originally obtained and made known to you (i.e. as stated above);
- (b) the Academy must ensure that the information is stored securely;
- (c) the Academy must tell you what it intends to do with the information;
- (d) unless the law allows it, the Academy cannot disclose personal information to another person/body – you should note that the only person/body that the Academy wishes to share the information with is BioStore. This is necessary in order for the cashless payment system operated by BioStore to work.



Providing your consent/objection

As stated above, in order to be able to use your child's biometric information, written consent is required. You can 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.

The Academy is also happy to answer any questions you may have.

If you do not wish your child's biometric information to be processed by the Academy, the law says that we must provide reasonable alternative arrangements.

If you give consent to the processing of your child's biometric information, please sign, date and return the enclosed consent form to the Academy.

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

Further information and guidance

This can be found via the following links:

- ICO guide to data protection for organisations: ico.org.uk/for-organisations/guide-to-data-protection/
- ICO guidance on data protection for education establishments: ico.org.uk/for-organisations/education/