

Dear Parent/ Carer,

Notification of Intention to Process Pupils' Biometric Information

The **Romero Catholic Academy Trust (Blessed Trinity R C 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 school meals/ catering provision. The information from your child that we wish to use is known 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 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, or palm. The school would like to take and use information from your child's facial and/or fingerprint biometrics and use this information for the purpose of providing your child with school meals/ catering provision.

The information will be used as part of an automated biometric recognition system. This system will take measurements of your child's facial and/or fingerprint biometrics and convert these measurements into a template to be stored on the system. An image of your child's facial and/or fingerprint biometrics 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 education providers 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;
- 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 or organisation – you should note that the only person/body that the school wishes to share the information with is CRB Cunninghams (supplier of biometric system) which is necessary for the operation of the system.

Providing your consent/objecting

As stated above, in order to be able to use your child's biometric information, the 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, 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 must be in writing and sent to: office@btrcc.lanccs.sch.uk

Even if you have consented, your child can object or refuse at any time to their biometric information being taken and used. Their 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 school meals/ catering provision. (Where consent is not provided a PIN number will be provided as an alternative method of authentication for the cashless catering system.)

To give consent to the processing of your child's biometric information, please tick the appropriate consents within Arbor. 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:

DfE guidelines for schools on communicating with parents and obtaining consent:
<https://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility/understanding-and-dealing-with-issues-relating-to-parental-responsibility>

ICO guide to data protection:
<https://ico.org.uk/media/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr-1-1.pdf>

ICO guidance on data protection for education establishments:
<https://ico.org.uk/for-the-public/schools/>

Yours sincerely,



Mrs D Williams
Headteacher