

April 2017

Dear Parent/Carer

CONSENT TO PROCESS STUDENT'S BIOMETRIC INFORMATION

Under the Protection of Freedoms Act 2012 (sections 26 to 28) which comes into force from September 2013, the College is 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.

As you will be aware, the College already uses 'biometric information' about your child as part of an automated (i.e. electronically-operated) recognition system for the purposes of cashless catering in the College dining room. Since the cashless system has been installed in the College we have seen huge benefits including an increase in the number of Free School Meals being taken, detailed information for parents on the type of foods purchased, elimination of the loss of dinner money scenarios, less possibility of sweets and chocolates purchased with cash on way to the College, more control on the daily spend for parents and finally less hassle trying to find the cash for the daily dinner money.

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 scan. Unless you or your child has previously opted out of the biometric system, the College currently holds information from your child's finger scan and uses this information for the purpose of providing your child with access to the cashless catering system in the College restaurant.

The automated biometric recognition system takes measurements of your child's finger and converts these measurements into an algorithm to be stored on the system. **An image of your child's fingerprint is not stored.** The algorithm (i.e. measurements taken from your child's finger scan) is what is used to permit your child to access the cashless catering system.

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

For example:

- (a) the College *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 College must ensure that the information is stored securely;
 - (c) the College must tell you what it intends to do with the information;
 - (d) unless the law allows it, the College cannot disclose personal information to another person/body.
- You should note that the only person/body that the College may share the information with is Cunninghams Cashless Solutions - the supplier of the cashless catering system. This is necessary for them to undertake maintenance on the cashless catering system. Cunninghams can only undertake such maintenance with the specific permission of the College, and may only view data for maintenance purposes. Cunninghams are not permitted to copy data and do not have access to any contact information such as addresses, telephone numbers or email addresses.

Providing your consent/objection

As stated above, under the new regulations, the written consent of at least one parent is required in order to be able to use your child's biometric information. 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 College 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.

Even if you have consented, your child can object or refuse at any time to their biometric information being taken and/or 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.

If you have not previously opted out of the biometric system, but at this point one parent objects in writing to the use of their child's biometric information, then the child will be issued with a swipe card and the biometric data currently held will be deleted.

The College 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 College, 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. Your child can be issued with a swipe card to use instead of the biometric system.

If you give consent to the processing of your child's biometric information, please sign, date and return the enclosed consent form to the Finance Office at the College. Please note that when your child leaves the College, 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 link:

Department for Education's '*Protection of children's biometric information in College*' guidance: <https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-Colleges>

Yours sincerely

Matt Burrell
Director of Finance and Resources

HONITON COMMUNITY COLLEGE ACADEMY TRUST

CONSENT FORM FOR THE USE OF BIOMETRIC INFORMATION IN COLLEGES

Please complete this form to indicate whether you give your consent to the College taking and using information from your child's fingerprint as part of an automated biometric recognition system. The biometric information will be used by Honiton Community College Academy Trust for the purpose of providing access to the cashless catering system in the College dining room. If you do not give your consent, your child will be issued with a swipe card for use in the College dining room.

In giving your consent, you are authorising the College to use your child's biometric information for the specified purpose until he/she either leaves the College or ceases to use the system. If you wish to withdraw your consent at any time, this must be done so in writing and sent to the Director of Finance at the college to the following address: Honiton Community College Academy Trust, College Lane, Honiton, Devon, EX14 1QT.

Once your child ceases to use the biometric recognition system, his/her biometric information will be securely deleted by the college.

Name of Child _____ Registration Group _____

Having read guidance provided to me by Honiton Community College Academy Trust,

EITHER (please tick as appropriate)

I give consent to information from the scan of the above named child's finger being taken and used by Honiton Community College Academy Trust for use as part of an automated biometric recognition system for the cashless catering system in the College dining room.

I understand that I can withdraw this consent at any time in writing.

OR

I wish the above named child to be issued with a swipe card for use with the cashless system in the College dining room.

Name of Parent: _____

Signature: _____

Date: _____

- Please return this form to the Finance Office, Honiton Community College Academy Trust, College Lane, Honiton, Devon, EX14 1QT