

September 2022

Dear Parents/Carers

Crestwood Community School wishes to use data about your child as part of an automated (i.e. electronically-operated) recognition system. This is for the purposes of our cashless catering system. The data from your child that we wish to use is referred to as 'biometric data'. We are legally 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 data for an automated system.

Biometric data and how it will be used

Biometric data is information about a person's physical or behavioural characteristics that can be used to identify them. The School would like to take and use data from your child's fingerprint and use this data for the purpose of providing your child with a cashless catering system.

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

When using biometric data about your child for the purposes of an automated biometric recognition system the School will ensure that:

- parents are told what the school intends to do with the data
- the data will not be used for any purpose other than the purpose for which it was originally obtained and made known to parents
- the data is stored securely
- the data will only be shared where the law allows it

A privacy notice is enclosed with further information about the collection and use of your child's biometric data.

Providing your consent/objecting

To be able to use your child's biometric data, the written consent of at least one parent is required. Either parent can object in writing to the use of their child's biometric data. If a parent objects, the School cannot collect or use their child's biometric data for inclusion on the automated recognition system. Similarly, if your child objects, the School cannot collect or use their biometric data for inclusion on the system.

You can also object at a later stage or withdraw any consent you have previously given. Please note that any consent, withdrawal of consent or objection from a parent must be in writing.



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

If you do not wish your child's biometric data to be used by the School, or your child objects, the School will provide reasonable alternative arrangements to provide them with school lunch.

Please find enclosed a consent form (and a privacy notice). If you consent to the School's use of your child's biometric data, please sign, date and return the consent form to the School.



APPENDIX B

CRESTWOOD COMMUNITY SCHOOL USE OF YOUR CHILD'S BIOMETRIC DATA PRIVACY NOTICE

Crestwood Community School ('the School') collects and uses your child's biometric data. The School will use the data for the following purpose(s): cashless catering system.

The School's lawful basis for the use of your child's biometric data is your written consent. The School will keep your child's biometric data in accordance with the School's retention schedule. You have some legal rights in respect of the biometric data we collect from your child. Please see the School's general privacy notice on our website: www.crestwood.hants.sch.uk for further details. You can contact the School's Data Protection Officer at: julia.hughes@crestwood.hants.sch.uk If you have a concern about the way we are collecting or using your child's biometric data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at: https://ico.org.uk/concerns/

CONSENT FORM

Notes: Please complete this form if you consent to Crestwood Community School ('the School') using data from your child's fingerprint by the School as part of an automated biometric recognition system. This biometric data will be used by the School for the purpose of a cashless catering system. In signing this form, you are authorising the School to use your child's biometric data for this purpose until they either leave the School or cease 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 School at the following address: FAO Julia Hughes, GDPO Officer, Crestwood Community School, Shakespeare Road, Eastleigh, SO50 4FZ

Consent:

Having read the information provided to me by the School, I give consent to data from the fingerprint of my child:

Child's Name
being taken and used by the School for use as part of an automated biometric recognition system for a cashless catering system. I understand that I can withdraw this consent at an time in writing.
Name of Parent/Carer:
Signature:
Date:
Please return this form to: Administration Office, Crestwood Community School



APPENDIX C

Model Biometric Data Policy

If and where Crestwood Community School ('the School') uses pupils' biometric data as part of an automated biometric recognition system (for example, for our cashless catering system) we will comply with the requirements of the Protection of Freedoms Act 2012.

Parents/carers will be notified in writing before any biometric recognition system is put in place or before their child first takes part in it. The School will seek written consent from at least one parent or carer before we take any biometric data from their child and first process it. Parents/carers will be provided with a privacy notice explaining how we will use their child's biometric data if a parent/carer has given their consent to use the data.

Parents/carers and pupils have the right to choose not to use the School's biometric system(s). If a biometric system is introduced, we will provide alternative means of accessing the relevant services for those pupils, by arrangement with the parent/carer and the Finance Officer.

Parents/carers and pupils can object to participation in a School's biometric system(s), or withdraw consent, at any time, and we will make sure that any relevant data already captured is deleted.

As required by law, if a pupil refuses to participate in, or continue to participate in, the processing of their biometric data, we will not process that data irrespective of any consent given by the pupil's parent(s)/carer(s).

Where staff members or other adults use the School's biometric system(s), we will also obtain their consent before they first take part in it, provide them with a privacy notice and provide alternative means of accessing the relevant service if they object. Staff and other adults can also withdraw consent at any time and the School will delete any relevant data already captured.