

Pen Y Dre High School BIOSTORE IDENTITY MANAGEMENT CASHLESS CATERING SYSTEM

This notice has been written in accordance with the General Data Protection Regulations and relevant legislation.

Information Governance Team

Lisa Richards - Data Protection Officer

Sam Bishop - Data Disclosure and Records Officer

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MERTHYR TUDFUL
MERTHYR TYDFIL
County Borough Council

Date Created: 25 May 2018

Responsible Department:

Responsible Manager:

Address: MTCBC, Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN

This privacy notice provides information on how the Cashless Catering System, BioStore, collects and processes personal data. BioStore is a central database located within the school. It stores the information which identifies pupils uniquely within the school. BioStore requires pupils to register only once, usually by placing a finger on a fingerprint scanner. This notice relates to the pupils that are registered within this system.

It is important that you read this privacy notice together with the School's full privacy notice which contains more detailed information about our data processing and can be accessed on our website.

1. IMPORTANT INFORMATION AND WHO WE ARE

Pen Y Dre High School is the controller and responsible for your personal data. Our School has appointed a Data Protection Officer who can be contacted using the following details:

Mrs. Lisa Richards (Data Protection Officer)

Address:	Information Governance Team	Email: data.protection@merthyr.gov.uk
	Merthyr Tydfil County Borough Council	Tel: 01685 725000
	Civic Centre	Fax: 01685 725060
	Castle Street	
	Merthyr Tydfil	
	CF47 8AN	

The School has decided to use BioStore to prevent pupils from borrowing or stealing credentials from each other and reducing the opportunities for bullying.

BioStore will be implemented as a cashless catering solution; queues are reduced because the speed of identification is much quicker with biometrics. Our pupils will no longer need to carry cards, remember PIN numbers, or use cash to buy a meal.

For those pupils that are not registered on the BioStore system the school will continue to have alternate methods for purchasing items from the canteen, which will be primarily smartcards.

2. THE DATA WE COLLECT ABOUT YOU

The BioStore System does not store images of pupil fingerprints, and never will. Only mathematical representations of certain minutia points of a finger (where a fingerprint ridge ends or splits in two) are recorded. Typically, between ten and sixty minutia points are recorded depending on the characteristics of the finger. This mathematical data is encrypted and is called a template. The data is extremely secure in its encrypted form, and even if it were not encrypted it would be impossible to recreate the original fingerprint image from the stored data.

The templates are recorded within the pupil school record which enables us to accurately record the correct template against the correct pupil.

Fingerprints cannot be replicated using the data stored in the system as the BioStore system only stores a short string of encrypted numbers, too little data for the original print to be reconstructed.

For those pupils who are twins (including identical twins) they will have different fingerprints, and will not be mistaken for each other by BioStore. If a pupil were to cut their finger this would not cause any problem for BioStore, unless it resulted in major disfigurement. If for any reason the fingerprint was no longer recognisable a new reading would be taken.

3. HOW WE USE YOUR PERSONAL DATA

We will only use the templates within our cashless catering system, there are no current plans to implement this system within any other area, however if the School decides to implement this system in other areas in the future we will update this privacy policy and notify you accordingly.

The BioStore database is protected by a licence key, meaning that the database and any backup of its contents can only be accessed on licensed hardware. The hardware is stored within the School. As such, the encrypted data is only available to the registered licensee. Even if the School's security were to be compromised and a backup of the database stolen, the encrypted data would still be unreadable, even by another school.

4. HOW WE SHARE YOUR PERSONAL DATA

We will not share your child's biometric data with any other data controller. The templates created in the system cannot be used by or transferred to any other system or for any other purpose. BioStore does not store fingerprint images. The recorded templates are comprised of a set of numbers which represent each person. The templates are not accurate enough to be usable for forensic matching. A court of law would not be able to use this information as evidence.

5. YOUR LEGAL RIGHTS

In accordance with the Protection of Freedoms Act 2012 we will only use the biometric cashless catering system if we have received the written consent of a parent or guardian. Consent forms will be issued to parents before the pupil's data is captured. Once we have received consent pupils can be opted out of the system should the consent be withdrawn. In these instances we will ensure the pupil is given an alternative method to access the canteen facilities.

We are committed to upholding our pupil's rights that are provided within the data protection laws; these will include rights in relation to accessing the personal data we hold, deleting the personal data and a number of other rights that are detailed in the School's full privacy notice.

If you are unhappy about how we use your personal data you can make a complaint to our Data Protection Officer. If you are not satisfied with the response of the Data Protection Officer you also have the right to make a complaint at any time to the Information Commissioner's Office, ICO, the ICO is the UK's supervisory authority for data protection issues:

Information Commissioner's Office (Wales)
2nd Floor
Churchill House
Churchill Way
Cardiff
CF10 2HH

Tel: 029 2067 8400
Fax: 029 2067 8399
Email: casework@ico.org.uk

6. FURTHER DETAILS

If you are looking for more information on how we process your personal data including on data security, data retention and lawful processing basis, please access our full privacy policy or contact our Data Protection Officer.