



Achieving Excellence

**Document Control Sheet**

Document Type	Policy
Document Name	Protection of Biometric information of children in schools and colleges
Originator	Rosie Hay
Approved by	Resources
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This document is part of the group which include	Data Protection
Equality Act 2010 fully considered	Yes
EIA Form Completed	Yes

**The County High School Leftwich  
 Granville Road, Northwich, Cheshire, CW9 8EZ  
 Telephone: 01606 333300**

## 1. Data Protection Information

- 1.1. The Cashless Catering system in the Academy is operated and administered by Camelia Investment 1 Limited trading as CIVICA (CIVICA) who are accredited with ISO27001 – Information Security Management System and is committed to ensuring that privacy is protected. Should we ask you to provide certain information by which you can be identified; you can be assured that it will only be used in accordance with this privacy statement.
- 1.2. CIVICA is registered as a data processor under the General Data Protection Regulation (GDPR,) and operate at all times under the GDPR Guidelines.
- 1.3. Schools' data will remain their responsibility and they remain fully in control of accessing, managing and updating all student data within the system. Schools and the local authority are operating as Data Controllers under GDPR. All CIVICA Staff that may have administrator access to schools data for support purposes are Disclosure Barring Service (DBS) checked.
- 1.4. Information collected to implement a Cashless Catering system is outlined below.

Essential information collected		Optional information may be requested
Admissions Number	Gender	Photographs
Surname	Date of Birth	Ethnicity
Forename	Year	School Form Group
Form	Free School Meal Allowance	UPN

- 1.5. CIVICA does not sell, distribute or lease your personal information to third parties.
- 1.6. You may request details on personal information, which we hold about you under the General Data Protection Regulation 2018.
- 1.7. CIVICA removes all data from Servers one week after the Cashless System has gone live within the school.
- 1.8. If you believe that any information we are holding about you is incorrect or incomplete, please write to or email us as soon as possible, at the address below.

## **2. How we store your information**

- 2.1. Civica is dedicated to keeping your data safe. We are certified under ISO27001 as having put technical and organisational policies and procedures in place to protect personal data from loss, misuse, alteration or destruction. We ensure that access to your personal data is limited only to those who need to access it and those individuals are required to maintain the confidentiality of such information. Where necessary, we apply encryption and anonymization techniques in efforts to further protect personal data.

## **3. How long we keep personal data**

- 3.1. We retain personal data for no longer than necessary for the purposes for which it is processed, unless we are required to do so by law.
- 3.2. Where appropriate, we may retain personal data for the establishment, exercise or defence of legal claims.

## **4. Sharing Information**

- 4.1. We will never sell your data to third parties. We may, however, share your data with companies with whom we have a direct business arrangement in order to jointly market Civica related products.
- 4.2. We also use third party data processors who provide marketing, marketing automation and lead-generation services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation and they will hold it securely and retain it for the period we instruct.
- 4.3. The legal basis for sharing these data is our legitimate interest in cost effectively marketing our business.

## **5. International Transfers**

- 5.1. Civica operates and provides services from its locations across the globe. As such, we may transfer personal information to Civica group locations outside of the UK when we have a business reason to do so. We have Intra-Group Transfer Protocols in place based on Standard Contract Clauses, which provide legal safeguards for such transfers, where applicable.
- 5.2. Additionally, in order to support the provision of our services, we may transfer personal data to our third-party service providers outside the UK. We only transfer this data where it is necessary to do so and where a legal safeguard is in place.

## **6. Your Rights**

- 6.1. Your right of access –You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

- 6.2. Your right to rectification – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.
- 6.3. Your right to erasure – You have the right to ask us to erase your personal information in certain circumstances.
- 6.4. Your right to restriction of processing – You have the right to ask us to restrict the processing of your information in certain circumstances.
- 6.5. Your right to object to processing – You have the right to object to processing if we are using legitimate interests as our lawful basis for processing.
- 6.6. Your right to data portability – This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or as part of a contract, or in talks about entering into a contract and the processing is automated.
- 6.7. Your right to withdraw consent – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

## **7. Rights related requests**

- 7.1. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it.
- 7.2. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

### **CIVICA**

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