

STATEMENT FOR SCHOOLS/ACADEMIES WHO DO NOT PROCESS BIOMETRIC DATA

THIS STATEMENT APPLIES TO ALL SCHOOLS/ACADEMIES WITHIN HEARTWOOD LEARNING TRUST WHO **DO NOT** PROCESS BIOMETRIC DATA

Document Management	
Updated Policy Approved	June 2025
Next Review Date	June 2027
Version	1.3
Approved By	Chief Operating Officer

Statement for Schools/Academies who do not Process Biometric Data

This statement has been published on our website to ensure that all relevant stakeholders (e.g. employees, parents/carers and pupils) understand that the school/academy does **not** process biometric data.

Biometric data consists of personal information about an individual's physical, physiological or behavioural characteristics that can be used to uniquely identify (recognise) that person. Examples of biometric data include, but are not limited to: fingerprints, facial shape, retina and iris patterns, and hand measurements. All biometric data is personal data.

Statement about the Processing of Biometric Data

Processing biometric data includes obtaining, recording or holding the data or carrying out any operation on the data including disclosing it, deleting it, organising it or altering it. An automated biometric recognition system processes data when:

- Recording individuals' biometric data, e.g. taking measurements from a fingerprint via a fingerprint scanner
- Storing individuals' biometric information on a database
- Using individuals' biometric data as part of an electronic process, e.g. by comparing it with biometric information stored on a database to identify or recognise individuals

Where biometric data is used for identification purposes, it is considered special category data, e.g. keystroke analysis.

This statement confirms that the school/academy **does** <u>not</u> store or process any form of biometric data, such as fingerprints or retina scans.

If the school/academy does decide to store or process biometric data, a policy will be implemented for the processing of such data, which would be made available on the school/academy website. Any changes made to the school/academy's position on the processing of biometric data will be clearly communicated to all stakeholders (e.g.employees, parents/carers and pupils) and written consent will be sought prior to any processing of biometric data.

If you have any questions about this statement, please contact the Trust's **Data Protection Officer (DPO)** via email to: <u>dpo@hlt.academy</u>.

The Trust's **Compliance Officer** and **Data Protection Officer (DPO)** will review this statement on at least a two yearly basis. The next scheduled review date for this statement is recorded on the cover page of this document.