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Statement on the Processing of

Biometric Data

#GN17

**Last amended 3rd September 2025**

**To be reviewed no later than August 31st 2026**

**Statement about the processing of biometric data**

This statement confirms that, Three Counties Academy Trust (TCAT), which includes the academies listed in the table at the foot of this statement, does not store or process any form of biometric data, such as fingerprints or retina scans. Please note that Lugwardine Primary Academy remains an associate member school until they merge into TCAT during the academic year.

The Trust Board, Executive Leadership Team and the Data Protection Officer (DPO) will review this statement on an annual basis. The next scheduled review date for this statement is 31st August 2026. TCAT commissions DPO services from Schools DPO, Nicola Cook is the Director and acts as DPO for all TCAT schools including associates.

If TCAT does decide to store or process biometric data in any of our academies, a policy will be implemented for the processing of such data, which would be made available on the TCAT and individual academy websites. Any changes made to TCAT’s position on the processing of biometric data will be clearly communicated to all staff, parents, and pupils.

If you have any questions about this statement, please contact the DPO via the TCAT Offices by contacting jlilleyattwell@tcat.school.

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| **TCAT Academy Name** | **Location** | **DPO** |
| Queen Elizabeth High School | Ashfields, Bromyard | N. Cook |
| St. Peter’s Primary School | Cherry Tree Close Bromyard | N. Cook |
| Bredenbury Primary School | Bredenbury | N. Cook |
| Stoke Prior Primary School | Stoke Prior | N. Cook |
| Lugwardine Primary Academy (Associate Member) | Bartestree | N. Cook |

# Monitoring and review

This statement will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled review date for this statement is 31st August 2026.

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| Signed by: |
|  | Executive Headteacher/CEO | Date: |  |
|  | Board appointed Trustee | Date: |  |