

Three Counties Academy Trust



**Statement on the Processing of
Biometric Data
#GN17**

Last amended 22nd June 2026 (v1.0)

Statement lifespan: 3 years. Subject to annual compliance check. Next full review 21st June 2029.

Version history

Date	Version	Details	Actioned by	PDF to Websites	Word to Governor Hub
22.06.26	1.0	Updated document. Formatted to house style and checked against model for updates	MF	✓	✓

TCAT Statement on the Processing of Biometric Data

This statement confirms that Three Counties Academy Trust (TCAT), including all schools within the Trust listed at the foot of this document, does not currently collect, process, store or otherwise use any form of biometric data relating to pupils, staff, volunteers, Local Governors, Trustees, visitors or any other individual.

For the purposes of this statement, biometric data includes personal information obtained through the measurement or analysis of unique physical or behavioural characteristics that can be used to identify an individual. Examples include, but are not limited to, fingerprints, retina or iris scans, facial recognition data, hand geometry, voice recognition data and other similar biometric identifiers.

TCAT is committed to ensuring that all personal data is processed lawfully, fairly and transparently in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and all other applicable legislation and guidance relating to information governance and privacy. As no biometric data is currently processed by TCAT or any of our schools, there is no requirement for pupils, parents, carers, staff or other stakeholders to provide consent for the collection or use of biometric information.

TCAT recognises that biometric data constitutes particularly sensitive personal information and that the collection and use of such data carries additional legal, ethical and safeguarding considerations. As a result, any future proposal to introduce biometric systems within a TCAT school would be subject to robust scrutiny, consultation and governance processes before implementation could be considered.

Should TCAT decide in the future to collect, process or store biometric data for any purpose, a dedicated Biometric Data Policy and associated procedures would be developed and implemented in advance. These would clearly set out the lawful basis for processing, consent requirements, data security arrangements, retention periods, individual rights and any alternative arrangements available to those who do not wish to participate. Such documentation would be published on both the TCAT website and the websites of any affected TCAT schools.

Any change to TCAT's position regarding the use of biometric data would be communicated clearly and in a timely manner to staff, parents, carers, pupils, Local Governors, Trustees and other relevant stakeholders. No biometric system would be introduced without ensuring that all statutory requirements had been fully met and that appropriate safeguards were in place to protect the rights and privacy of individuals.

This statement applies to all schools currently within Three Counties Academy Trust.

Responsibility for oversight of this statement rests with the Trust Board, Executive Leadership Team and TCAT's Data Protection Officer (DPO).

TCAT commissions Data Protection Officer services from Schools DPO. Nicola Cook, Director of Schools DPO, acts as the appointed Data Protection Officer for all TCAT schools.

Questions regarding this statement, data protection matters and TCAT's approach to biometric data should be directed to the Data Protection Officer via the TCAT Central Offices by contacting jilleyattwell@tcat.school.

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