



STATEMENT FOR SCHOOLS/ACADEMIES WHO DO NOT PROCESS BIOMETRIC DATA

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

Document Management	
Updated Policy Approved	April 2024
Next Review Date	April 2025
Version	1.2
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. staff, 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 or behavioural characteristics that can be used to identify that person, including their 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 we **do not** 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 staff, parents/carers and pupils and written consent will be sought prior to any processing.

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

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