Eversfield Preparatory School

PRIVACY NOTICE (pupils)
How we use pupil information

This notice contains the key information about how and why the School collects and processes your child's personal data, what we do with that information and what your rights are.

Eversfield Preparatory School Trust Limited is a data controller for the purpose of the Data Protection Act. We collect and hold personal information relating to our pupils and may also receive information about them from their previous school or nursery, local authority and/or the Department for Education (DfE).

What is personal information?
Personal information is information that identifies your child as an individual and relates to your child. For example, information about how well your child is doing at School and any information that we need to take care of your child. Photographs, videos and CCTV recordings of your child also count as their personal information.

The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details of parents/guardians and address)
- characteristics (such as gender, date of birth, nationality, ethnicity and language)
- safeguarding information (such as court orders and professional involvement)
- special educational needs
- medical and administration (such as doctors information, child health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as foundation stage and key stage data and results)
- behavioural information
- photographs and videos for educational use and identification purposes
- identity management/authentication (biometric facial recognition access to areas of the School – please see ANNEX A for further information)

Why we collect and use pupil information
Our primary reason for using your child's information is to provide your child with an education and to keep them safe.

The admission forms (registration, confirmation of entry, contract and pupil information) you complete, and subsequent data collection forms (to check the information we hold), provide us with personal information about your child. We also get information from your child's previous school/nursery if we need this to teach and care for them.

Sometimes we receive and/or share information from your child's doctor and other professionals where we need this to look after your child.

We collect and use pupil information, for the following purposes:

a) to support pupil learning
b) to monitor and report on pupil attainment progress
c) to safeguard pupil welfare and provide appropriate pastoral care
d) to assess the quality of our services
e) to keep children safe (i.e. food allergies, medical information, emergency contact details, court orders)

f) to meet the statutory duties placed upon the School for ISC and DfE data collections
g) we use CCTV to make sure the School is safe
h) to make sure the School is safe, we use a biometric facial recognition access system on entrances to and within the School.

Our legal bases for using your child's information
Under UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

Legitimate interests
The School is processing your child's information for legitimate interests except where the processing is unfair to your child. The School relies on legitimate interests for most of the ways in which it uses your child's information.

Specifically, the School has a legitimate interest in:

- Providing your child with an education and making sure that your child is behaving properly.
- Safeguarding and promoting your child's welfare and the welfare of other children.
- Complying with our agreement with you for your child to be at the School.
- Keeping the school buildings safe, including operating security cameras in various locations on the School's premises and using facial recognition scanners for access to areas of the school
- Making sure that the School is well managed
- Promoting the objects and interests of the School. This includes fundraising and marketing, e.g. using photographs of pupils in promotional material such as on our website and in the prospectus.
- Ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).
- Using your child's information in connection with legal disputes.
- Facilitating the efficient operation of the School.

In addition your child's personal information may be processed for the legitimate interests of others. For example, we may use information about your child when investigating a complaint made by another pupil.

If you object to us using your child's information where we are relying on legitimate interests as explained above, please speak to the Headmaster.

Legal Obligation
The School may need to use your child's information in order to comply with a legal obligation, i.e. to report a concern about their wellbeing to Children's Services. The School may also have to disclose your child's information to third parties such as the courts, local authority or police where legally obliged to do so.

Vital interests
In limited circumstances, the School may use your child's information to protect their vital interests or the vital interests of someone else, for example to protect someone's life (medical care).

Public interest
The School considers that it is acting in the public interest when providing an education.

Special category data
The School must also comply with an additional condition – special category data – where it processes special categories of personal information. Special category data includes information about an individual's health, race, ethnic origin, politics, religion, sex life, trade union membership, genetics, biometrics (where used for ID purposes), sexual orientation and actual or alleged criminal activity. The lawful bases we rely on for processing special category data are:

Substantial public interest
The School is allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to 'public interest'. For example, the School will use information about your child's health to look after him/her. We may also use other types of special category personal data about your child to provide them with an education, to look after your child and/or when the School is inspected.

Vital interests
In limited circumstances the School may use your child's information to protect his/her vital interests or the vital interests of someone else, e.g. if your child is seriously hurt.

Legal claims
The processing is necessary for the establishment, exercise or defence of legal claims. This allows the School to share information with our legal advisers and insurers. This applies whenever sharing special category data is necessary in relation to legal claims.

Medical purposes
This includes medical treatment and the management of healthcare services.

How we collect pupil information
We collect pupil information via admissions forms (registration, confirmation of entry, contract and pupil information) parents complete as well as from your child's previous school/nursery.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with the data protection legislation when the information is requested voluntarily we ask you to confirm your choice.

Consent
The School will ask for your consent to use your child's information in certain ways as an alternative to relying on any of the bases above. For example, the School requests your consent to take photographs/videos of your child to use on the school website/social media, in school publications and for marketing purposes. Where the School is relying on consent as a means to process personal data, any person may withdraw consent at any time.

How we store pupil data
In accordance with our Record Keeping Policy, we hold pupil data securely, in electronic and paper format, and for as long as it is necessary to keep for a legitimate and lawful reason. A copy of the Record Keeping Policy is available on request.

Who we share pupil information with
We share your child's data to support their learning and have a legal obligation to routinely share pupil information with:

- schools that pupils attend after leaving us
- the local authority
- the NHS (for example, flu vaccinations)
- the Independent Schools Inspectorate (ISI)
- the Independent Schools Council (ISC)
- the Department for Education (DfE)
- the Charity Commission

The Department for Education (DfE) collects personal data from educational settings and local authorities via an annual school census and other statutory data collections (i.e. Early Years Foundation Stage Profile data). Some of this information will be stored on the National Pupil Database (NPD).

In addition, we are required to share information with the Independent Schools Council (ISC) who collect personal data about pupils attending independent schools via an annual school census.

We will also disclose your child's personal data to a range of suppliers to support their learning and communication within School. The specific suppliers will change from time to time but include:

- Assessment systems to enable target setting and monitoring of progress (e.g. Quest, CEM InCAS, Accelerated Reader, EdShed
- Online learning journals, e.g. Seesaw (http://seesaw.me), where pupils can share their work (including photos, videos, worksheets, drawings and voice recordings) and parents can access via Seesaw for Families.
- Suppliers of online resources to support pupils work, both in and out of school (e.g. SpaG, Maths.co.uk, TT Rockstars, Spellzone, MyMaths)
- Communication and organisation systems (e.g. Parentmail, iSAMS Parent Portal
- Web based conferencing applications (e.g. Zoom) may occasionally be used for tutorials should the school be unable to open or operate in a normal capacity
- Examination boards, e.g. Trinity, Associated Board of the Royal Schools of Music (ABRSM), London Academy of Music and Dramatic Art (LAMDA)
- Photography company for the provision of official school photographs (i.e. individual, class, team and other groups).
- Peripatetic music staff who provide individual instrumental tuition.

The information disclosed to these services will usually only include the key information (pupil name, date of birth, gender) required to enable use of the systems. Where other information is required, i.e. videos and voice recordings, parental consent will be requested.

Why we regularly share pupil information
We share information about our pupils for the following reasons:

- The School is under a legal obligation to disclose the information or disclosing the information is necessary for us to meet legal requirements imposed upon us such as our duty to look after our pupils and protect them from harm.
- It is necessary for us to disclose your or your child's information for the purposes of our functions in providing schooling. This is a function which is in the public interest.
- We have a legitimate interest in disclosing your information because it is necessary in order to provide our pupils with education and pastoral care and connected purposes as outlined above.
- We will not usually need consent to disclose your or your child's information. However, if at any time it appears that we would need consent then this will be sought before a disclosure is made.
- It is in your child's vital interests for your child's personal information to be passed to these people or services.

Sending information to other countries
We do not normally transfer your or your child's information to a different country which is outside the European Economic Area. This would only happen if one of the child's parents lives abroad or if the child moves to a new school abroad. If this happens we will be ensure that it is safe to transfer your child's information.

What decisions can you make about your child's information?
The UK GDPR gives parents and pupils certain rights about how their information is collected and used. To

make a request for your personal information, or be given access to your child's educational record, contact Mrs Jemma Webb, Director of Administration, at the School address.

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at raise a concern with ICO.

Further information and guidance

If you would like to discuss any queries or have any concerns about the way we are collecting or using your personal data, please contact Mr Robert A Yates, Headmaster (Data Protection Compliance Officer) or Mrs Jemma Webb, Director of Administration, Eversfield Preparatory School, Warwick Road, Solihull, West Midlands, B91 1AT, 0121 705 0354.

If you consider that we have not acted properly when using your child's personal information you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

Monitoring and Review

The School will monitor, review and update this Privacy notice annually and in line with any further changes to data protection law.

JW, Sept 2026

Eversfield Preparatory School

ANNEX A – BIOMETRIC INFORMATION AND HOW IT WILL BE USED

We take site security very seriously and, throughout the school, doors to buildings are accessible via a biometric facial recognition system. The system we use is provided by Almas Industries (www.almas-industries.com).

Pupils are able to use the system from Form 2 upwards.

In addition, Kindergarten/Nursery parents may also use the facial recognition scanner to enable time limited access via the Manor Rd entrance for lunchtime collection of their child from Kindergarten/Nursery. The biometric data will be erased once the child moves out of Kindergarten/Nursery.

The school uses an automated biometric recognition system using biometric information from your child's facial features to enable your child to access areas around the School. The information the system uses is referred to as 'biometric information' and is stored as an encrypted biometric template consisting of partial data from an image, which is encrypted and cannot be used to recreate the complete original image.

This system will take measurements of your child's facial characteristics and convert these measurements into a biometric template to be stored on the system in a binary format as Y axis and X axis reference points and the data is encrypted within the database. An image of your child's face is not stored. The template is what will be used to allow your child to access entrances around the School.

You should note that the law places specific requirements on schools and colleges when using personal information, such as biometric information, about pupils for the purposes of an automated biometric recognition system. For example, the school cannot use the information for any purpose other than those for which it was originally obtained and made known to the parent(s), the school must ensure that the information is stored securely, the school must tell you what it intends to do with the information, and, unless the law allows it, the school cannot disclose personal information to another person/body. You should also note that the only body that the school shares the information with is Almas Industries, the supplier of the biometric system, in order to ensure operation of the system.

In order to be able to use your child's biometric information, the written consent of at least one parent is required. Your consent is requested on the **Pupil Information Form** which needs to be completed when your child joins the School. Separate consent may be sought if any changes are made to the method of biometric entry.

You or your child can object to the processing of your child's biometric information at a later stage or withdraw any consent you have previously given by putting your request in writing to the Headmaster. If you do not wish your child's biometric information to be processed by the school, or your child objects to such processing, the law says that we must provide reasonable alternative arrangements for children who are not going to use the automated facial recognition system.

Please note that when your child leaves the school, or if for some other reason he/she ceases to use the biometric facial recognition system, his/her biometric data will be securely deleted.

Sept 2026