

# **Admissions Privacy Notice**

v1.1

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| Owner (Name, Title): | Deborah Cleveland-Hurley, Registrar                       |
| Classification:      |   |
| Comment:             | Updated to include online tests for secondary applicants. |

# Admissions Privacy Notice

### For Parents, Guardians and Candidates

### Introduction

At Forest School we value the rights and freedoms of all people. We respect your privacy, and we protect the personal data of parent/s or guardian/s ("parents"), and that of the child or young person (the "candidate") applying for entry to the school.

This notice describes how we collect and use ("process") information about you during the admissions process. It also tells you how to contact us and outlines your rights regarding the personal data that we collect during the process. We commit to updating this notice from time to time to keep you informed about how we process your personal data.

You can contact our Privacy Officer ("PO"), who oversees this notice, at any time with questions or concerns you may have about the notice by

- email to <u>privacy@forest.org.uk</u>,
- writing to Privacy Officer, Forest School, Snaresbrook, London, E17 3PY
- calling 020 8520 1744.

'Personal data' refers to any information about a living person (the 'data subject') that identifies the person or can be used to identify a person when used together with other information.

Our data subjects in the admissions process include parents or guardians, and candidates.

## How we obtain personal data

During our admissions process, we mostly collect personal data about parents and candidates, directly from parents. However, we also collect some personal data from the candidate's previous school(s).

We obtain test and interview data directly from candidates when they complete our admissions tests and interviews. We also get test data from external assessment services in some entry years.

For parents wishing to apply for a bursary, we receive only the outcome of an independent financial means assessment from a specialised external provider.

# What personal data do we process and why?

We gather and use several types of personal data during our admissions process, for the purposes specified below. We do not keep or process information that is not needed after each stage of admission, as described below.

### To manage open days and promotional events

We collect and use contact data to keep interested parents or candidates informed of events, the admission schedule, and other arrangements. We collect information required to safely host visits, tours, or online events to view the school.

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We would collect identifiers and contact details, emergency contact details and health/medical information to support candidates or parents while they are on our premises.

For parents or candidates who choose to register an application for admission, this information is retained to facilitate further communication and processing. It is also used to grant parents access to our online registration forms.

### To administer registration and application procedures

We collect information about the candidate to process an application for admission, and to administer and manage different forms of academic evaluation, testing, and interviews later in the process.

For example, we collect the financial information needed to process an application fee.

We also collect and use information to assure compliance with school policies and legal requirements, such as to guarantee pupils equity in opportunities and to check that we can provide the necessary academic and pastoral support to candidates if they were to join the school.

In this phase we collect information from parent/s or the candidate, and from previous schools, including the candidate's:

- Identifiers and contact details, like personal identifiers and contact information (such as name and address), date of birth
- First language, level of English knowledge, other languages spoken
- Examination results, academic assessments, and other academic records from previous schools, for verification
- School attendance, such as lessons attended, number of absences, absence reasons and any previous school(s) attended
- Social development, language and mathematical skills or other skills related to previous educational courses, from references provided by previous teacher(s), if applicable
- Behaviour, such as exclusions and any relevant alternative provision/s put in place
- Academic or co-curricular history required for scholarship applications
- Health and safety information, like emergency contact information, health, and medical condition to prevent or effectively manage incidents on site
- Special Educational or Medical Needs report
- Year on Entry and the Year Group applied for

### To conduct selection testing and interviews for evaluation and admission

We collect and use information about the candidate's performance in various assessments, together with information previously gathered in the registration process, to evaluate candidate's application for entry to the school, and to award bursaries and scholarships, where candidates or parents apply for these.

Information collected in testing and interviews include

- Entrance exam and other test responses and results, including performance information or recordings for sport and music scholarships
- Interview notes and scores

To conduct external baseline tests for evaluation and admission

For Preparatory School Applicants:

We share personal identifiers of candidates with the Cambridge Centre for Evaluation and Monitoring (CEM) a service provider that conducts a baseline assessment (InCAS).

- We are the data controller, and CEM are a data processor for us
- CEM return reports for each candidate
- For information about how CEM manage personal data, please visit <a href="www.cem.org/privacy-notice">www.cem.org/privacy-notice</a>

Please contact our Privacy Officer (privacy@forest.org.uk) if you have any questions about the data that is shared

### For Senior School Applicants:

- We share personal identifiers of candidates with Atom Learning Ltd who conduct online tests for us and provide us with test scores for each candidate
- We are the data controller, and CEM are a data processor for us
- For information about how Atom Learning manage personal data, please visit <a href="https://atomlearning.com/privacy">https://atomlearning.com/privacy</a>
- Please contact our Privacy Officer (<a href="mailto:privacy@forest.org.uk">privacy@forest.org.uk</a>) if you have any questions about the data that is shared

### To administer outcomes and complete contracts

We process and communicate information about unsuccessful candidates, candidates held on waiting lists, and candidates who receive offers.

For successful candidates who accept offers, we process information needed to complete an agreement, including financial information of parents, and other information needed to enrol the candidate into the school, for example

- confirmation of your legal status as a candidate or parent
- to verify that you have the financial ability to support the school's tuition and fees, or qualify for a bursary, we may collect employer and financial information

- to place students in Houses in our House systems of pastoral care
- to arrange induction events
- to complete the contract with the school

#### How we process bursary applications

We employ the services of a company called Bursary Assessment Associates to undertake the financial evaluations used to assist us in making bursary award decisions.

For the purposes of your application:

- The school is the Data Controller of your information
- Bursary Assessment Associates is the Data Processor of your information

The following process explains how your information is handled throughout the process, and how we keep it secure:

- 1. An electronic application form will be completed and submitted to Bursary Assessment Associates as directed by the school. Supporting paperwork must be included as part of this submission.
- 2. In exceptional circumstances, a paper Application Form and supporting paperwork may be sent either to the school or to Bursary Assessment Associates, if sent to the School, this will be scanned and securely transmitted to Bursary Assessment Associates so that they may undertake the assessment required by the school.
- 3. Bursary Assessment Associates is registered with the Information Commissioner's Office and has satisfied the school as to its arrangements regarding the security of any information and documents you may provide as part of your application.
- 4. Bursary Assessment Associates will contact you to make an appointment for a home visit if the school has required this, or to make enquiries which will ensure that any paper financial review is as accurate as possible.
- 5. Bursary Assessment Associates will send its report on your application securely to a named person at the school and will then withdraw from the process unless the school has any further enquiries, they wish the company to make.
- 6. Bursary Assessment Associates will scan and store securely on fully protected servers any applications, notes and supporting documents regarding your application, and shred any paper documents securely.
- 7. The electronic records will be archived on fully protected servers for between three to seven years according to the School's Records Management and Retention policy.

This process is undertaken only for the purpose of considering your application for a Bursary. Your information will not be passed to any third party.

The report produced by Bursary Assessment Associates is the property of the school, and the report is confidential.

Visit <u>www.bursaryassessmentassociates.co.uk/privacy-policy</u> for more information about them and how they use and secure information about you.

### Special category data

We need to process some data which is considered "sensitive" or "special category" personal data.

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This data includes personal data regarding our candidates, concerning:

- their safeguarding/protection
- health and medical conditions
- special educational needs and disabilities (SEND)

The information is gathered during to accommodate candidates' specific needs and safety during the admissions process. For example, we may need to organise support or facilities to accommodate learning needs or disabilities or specific diseases, allergies, or food intolerances.

For candidates who join the school, we also gather health and medical data, and data about special educational needs before completing the parent agreement:

- The school needs health and medical data to fulfil our contractual obligations to parents and to meet legal obligations.
- The school also needs SEND data to fulfil our contractual obligations and meet legal obligations applicable to schools.

### What are our legal bases for processing personal data?

We rely on the following lawful bases to process personal data about parents and candidates:

To fulfil the contract that we have with candidates' parents, or because parents have asked us to take specific steps that will lead to entering a contract.

To meet our legal obligations as a school.

To meet our legitimate interests to promote the school.

Where we use special category data, we may rely on the following additional lawful bases to do so:

Vital interest, to protect the life of a parent or candidate – we would use this lawful base for safety onsite, for example to cater for allergies, or if there is an accident and the candidate or parent is unable to represent themselves.

Your explicit consent to process this personal data for one or more specified purposes. You have the right to withdraw that consent at any time.

If you change your mind, or you are unhappy with our use of your personal data, please contact our Privacy Officer at <a href="mailto:privacy@forest.org.uk">privacy@forest.org.uk</a>

# How do we use and protect personal data?

We limit access to personal data, in our IT systems and infrastructure, and on paper, only to those individuals that strictly need to know the personal data to provide candidates and parents with services, assistance and support.

Personal data is kept confidential and protected through appropriate technical and organisational measures to ensure the security of personal data, including policies around the use of technology and devices, and access to school systems.

# Who may we share personal data with?

During the admissions process, we may transfer personal data that we have gathered (including special category personal data where appropriate) of parents or candidates, to some third parties.

We will provide information to each candidate or parent (which can include relevant personal data of the candidate) as necessary during the admissions process. This means that we will share candidate information with parents, and (only) necessary parent information with candidates.

Specifically, we may share data with:

The school's professional advisors and testing services, including bursary assessors and external testing

Relevant authorities (if legally required to do so)

Third party services, such as our e-mail provider to communicate with parents and candidates, or payment providers that process payments.

These service providers process personal data on our behalf and under our instructions for the purposes described above.

We may share your personal data with other organisations for legal or statutory purposes if we are required to, or where we have your consent to do so.

Some third parties which process personal data, are 'joint data controllers' or data controllers in their own capacity. These include payment providers and financial institutions, as well as law enforcement. We only transfer personal data with these parties when it is necessary. These transfers are always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions. We do not transfer personal data you have provided unless we are satisfied that the personal data will be afforded an adequate level of protection.

We may transfer data to other countries. If we do, we will rely on either the existence of adequacy agreements or standard contractual clauses as part of agreements with these data processors. Please contact our Privacy Officer if you need more information about international data transfers.

We will not sell, distribute, or lease your personal data to third parties unless we have your permission or are required by law to do so.

# Profiling/automated decision making

We will not use your personal data or that of your children for decisions based solely on automated processing or profiling if the decision produces legal effects concerning you or significantly affects you unless you gave your explicit consent for this processing.

# Your rights regarding your personal data

Under data protection laws, you have several rights regarding personal data we hold about you as a parent or candidate. You have

### The right to access information that we hold

You can ask, and obtain access to, and/or copies of, personal data that we hold, subject only to some legal exemptions.

### The right to correct information that is incorrect

We try to ensure that personal data held about parents or candidates is as up to date and accurate as possible.

Please notify the admissions team at admissions@forest.org.uk of any changes to personal data, such as contact details, as soon as possible.

If you have a concern about inaccurate information, please contact the Privacy Officer.

#### The right to erase information in certain circumstances.

You can ask us to erase information, for example information that is no longer necessary for us to keep.

### The right to restrict or stop our processing of information in certain circumstances.

You can ask us to stop processing information, for example if our records seem wrong, and you wish to exercise other legal rights before the record is updated.

### To move information to another party

You can ask us to transfer information, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another school or other third party.

### The right to object to certain uses of information

On grounds relating to your situation, you can object to any of our processing activities where you feel this has a disproportionate impact on your rights, including your right to object to receiving fundraising or promotional communications.

Specifically, you may object to our collection or use of personal data where our lawful basis for processing is:

for the 'legitimate interests' of the school

for a task carried out in the 'public interest' or in the exercise of official authority vested in our school based on your consent, and you do not consent

Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

### Exercising your rights, and your right to complain

The rights above are not absolute. We may be entitled or required to refuse requests where exceptions or exemptions apply.

You have the right to complain if there is something that you do not like about our data practices.

Please contact our Privacy Officer if

- you have any questions or concerns about how we are using personal data, or
- wish to exercise any of your rights for which we are the data controller, or
- wish to lodge a complaint.

We will respond to any written requests or complaints as soon as is reasonable and possible, but always within 30 days.

You further have the right to contact the Information Commissioner's Office at <a href="www.ico.org.uk">www.ico.org.uk</a> if you are unhappy about the way that we process personal data.

# How we keep and protect your personal data

We securely store personal data in accordance with legal requirements and school policy.

We retain personal data only for the lawful purpose(s) for which the information was collected, relying on the legal bases mentioned before.

We only store personal data for as long as necessary to accomplish our purposes, or as required by law.

When we no longer need to process a particular piece of personal data in the Admissions process, we securely destroy it in accordance with legal and policy requirements.

For all 11+ and 13+ applications to the senior school, test data is erased as soon as offers are sent by the school. All other data is retained for no longer than 3 months from the day that offers are sent after which the school may retain only anonymised data for statistical analysis and reporting.

For 16+ applications to the senior school, all application data is retained for no more than 9 months from the day that offers are sent, after which the school may retain only anonymised data for statistical analysis and reporting.

For candidates who are offered a place, and admitted to the school, data will be retained for processing according to the school's Records Management and Retention policy.

### Forest School

For all candidates offered a waiting list option, their application information may be retained, but only with the necessary consent. This is to evaluate the application and communicate about vacancies that may arise.

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Authorised by:

Mr D R Lundie, Privacy Officer

Effective date of the policy: 1 March 2024

Review: Annually, and immediately following any relevant data protection related incident.

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Status: Drafted in accordance with the Data Protection Act 2018