



TRANSPARENCY NOTICE FOR PUPIL APPLICANTS

Policy Custodian: Deputy Head Information Systems

Approving Body: MTS Senior Leadership Team

Approved: February 2020

(This notice does not apply to Merchant Taylors' Prep.)

The General Data Protection Regulations and Data Protection Act 2018 protects an individual's rights in respect of their personal information and personal data. The following rights exist for individuals:

- Right to be informed how data is used by the School. (As set out below in this notice).
- Right of access to personal data held by the School.
- Right of rectification where personal data can be rectified if it is inaccurate or incomplete.
- Right of erasure also known as the "right of erasure" is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- Right to restrict processing in order to 'block' or suppress processing of personal data in certain circumstances eg where the data is inaccurate or the processing was unlawful, so that particular data is merely held but not processed.
- Right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
- Right to object to processing based on legitimate interests, direct marketing or processing for purposes of scientific/historical research and statistics.
- Right to object to decisions made automated individual decision-making (making a decision solely by automated means without any human involvement).

Merchant Taylors' School holds and processed significant amounts of 'personal data' about members of the School community. Under the Act, the School must process such personal data 'fairly'. The GDPR say that the information provided to data subjects about how the School processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child under 13 years of age;
- free of charge.

The School's Information Commissioner's Office registration number is Z1484349 and its registered address is Merchant Taylors' School Ltd. The School Address is Sandy Lodge Lane, Northwood, Middlesex, HA6 2AT.

Whilst Merchant Taylors' School is the Data Controller for the School, the School has appointed the Deputy Head Information Systems as its Privacy Officer to endeavour to ensure that all personal data is processed in compliance with this policy and the Regulations. In the event if queries arise, the DHIS may be contacted at the School via email: info@mtsn.org.uk or telephone, 01923 820644 or via written communication sent to the Deputy Head Information Systems at the School postal address.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about applying to and joining the School. Merchant Taylors' will therefore have a "legitimate interest" for processing basic personal data and sensitive personal data. The data the School holds will be the minimum it requires to form and maintain the contract between you and the School.

The School will use process personal pupil data about individuals for a number of purposes as part of its 'legitimate interest' and 'business' operations, including as follows:

- names, dates of birth, addresses, telephone numbers, e-mail addresses, other contact details and nationality;
- bank details and other financial information, e.g. about parents who pay application fees to the School;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- references given by the feeder School about applicants, and information provided by previous educational establishments and/or other professionals or organisations working with applicants;
- marks secured by candidates in entrance examination papers and notes made by Senior Staff during applicant interviews.

Occasionally, the School will need to share personal information relating to its community with third parties, such as professional advisers (eg health care professionals, psychologists, counsellors, lawyers and accountants) or relevant authorities (eg police or the local authority). The School will also retain copies of information submitted by applicants in support of Bursarial applications. The School will also retain reports received from a third party provider Bursarial Applications Ltd (BAL) who are retained by the School to access Bursarial applications received from candidates. As part of the Bursary application, the financial reports received from BAL are confidential from the applicant and his family.

Merchant Taylors' School Ltd uses a Third Product called Formstack to harvest applicant data. Formstack LLC complies with the EU-US Privacy Shield Framework regarding the collection, use, and retention of personal information transferred from the European Union to the United States.

In the case of pupils that apply to Merchant Taylors' School, but are unsuccessful in their application, personal data will be retained for seven years after the conclusion of their application.

With the exception of a confidential reference from an applicant's feeder School, we will obtain the data the School requires from the pupil, his parents or guardians directly. Should we need data from other sources we will contact you within a month of the date at which the School acquired the additional data.

We see the provision of personal data as necessary to properly admit each applicant to the School and to administer, and for the School to fulfil its obligations under the contract once your each begins his education at the School.

There is no automated decision making or profiling involved in the Merchant Taylors' application process or during a pupil's time at the School.

The School has a statutory obligation to establish nationality and hence the right of residency of its pupils.

Applicants can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making. Applicants aged 13 or over are generally assumed to have this level of maturity. All subject access requests from pupils will therefore be considered on a case-by-case basis.

A person with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils. A pupil of any age may ask a parent or other representative to make a subject access request on his behalf.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with the Act, they should utilise the School complaints procedure and should also notify the Deputy Head Information Systems. An individual can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel (01626) 545 700. However, the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

The School will update this Transparency Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable. Further details on personal data protection can be obtained in the School's Privacy Notice.

Deputy Head Information Systems