

## PRIVACY POLICY – LGfL eAdmissions

### OVERVIEW

**Our Intent.** We are committed to safeguarding the privacy of users who use the eAdmissions website service and we will only use the information we collect about you lawfully.

**Changes to Data Protection Legislation.** Data Protection legislation is currently going through a period of change. The introduction of the European Union’s General Data Protection Regulation (GDPR) is the basis of change and has been applied from the 25 May 2018 by The Data Protection Act 2018.

**Data Subject’s Privacy Notice.** This Privacy Notice should be read by Data Subjects, i.e. “you,” or any identifiable person using the London Grid for Learning (LGfL) eAdmissions website.

**The Data Controller.** On behalf of the data controller who are all London Local Authorities (LAs) and Surrey County Council, the LGfL provides an eAdmissions website. The process is run for pupils and parents/guardians applying for a school place across Nursery, Reception, Junior, Secondary and University Technical Colleges. This is an annual process.

**The Data Processor.** This eAdmissions website [www.eAdmissions.org.uk](http://www.eAdmissions.org.uk) is owned and operated by LGfL. Our contact details are:

- Email: [dataprotectionenquiries@lgfl.net](mailto:dataprotectionenquiries@lgfl.net)
- Mail: LGfL, CI Tower, St Georges Square, New Malden, KT3 4TE.

**Data Protection Officer (DPO).** Each local authority will have a DPO. The LGfL have appointed a DPO who can be reached at [dataprotectionenquiries@lgfl.net](mailto:dataprotectionenquiries@lgfl.net). All DPOs, including the LGfL’s, fulfil a number of roles one of which is to be the primary and independent point of contact for Data Subjects, namely you. To raise concerns regarding the processing of your personal data by the LGfL, please email or send a letter to our contact details above, at which point the enquiry will be forwarded to the DPO of the Data Controller or respective member of staff for action.

**Purpose of Processing Personal Data.** We collect personal data on this website primarily to support the process of school admissions, so that children are allocated to one of their preferred schools, nurseries or colleges.

**Lawful Basis of Processing Personal Data When Visiting This Website.** The lawful basis of processing your personal data when using the eAdmissions website is assessed to be: *“processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.”* Namely to support the statutory duty of the Schools Admissions Code. For further information see:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/389388/School\\_Admissions\\_Code\\_2014\\_-\\_19\\_Dec.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/389388/School_Admissions_Code_2014_-_19_Dec.pdf)

**Categories of Personal Data Processed by LGfL.** The personal data collected during the eAdmissions process is to support the statutory requirements of allocating educational places. Across all LGfL processes and services we will seek to ensure all personal data is accurate and up to date. The personal data which we hold will be held securely and in accordance with our internal data protection and security policies.

The information required for eAdmissions is:

Parent/guardian details:

Title (Mr, Mrs, Miss, etc)

First name

Last name

Address

E-mail address

Telephone number (up to 3) including mobile phone number(s)

Child's details:

First name;

Middle names;

Last name;

Date of Birth;

Gender;

Address (if the child lives at a different address to the USO account holder then alternative address details are required);

Relationship to the child;

Parental responsibility;

Twin/Triplets/Multiple births;

Is/has previously been in care;

Has the child a statement of special educational needs or EHCP;

Current nursery;

Nursery attendance details;

Second contact details;

School preferences (up to a maximum of 6)

Sibling(s);

Staff;

Exceptional medical or social reasons;

Reasons of preferences (free text).

**Category of Recipients of Personal Data.** LGfL acts as a Data Processor on behalf of schools (includes nurseries and colleges for the purposes of this Privacy Notice) and local authorities to enable them to deliver education services. Therefore, our processes and services are primarily delivered under their instruction as the Data Controllers and data is shared as appropriately with schools and local authorities.

The overview of this information sharing is that each applicant will have a Home Local Authority, which is where the applicant is resident. The Home Local Authority is the principal point of contact for the applicant and is responsible for managing the application.

If the applicant lives in one local authority but the school applied for is in another this is considered a cross border application. There is a Pan London Register which provides the interface between London Local Authorities, Essex, Herts, Kent, Surrey County Councils, and Thurrock when there is a cross border application. The Local Authority where the school is maintained is referred to as the Maintained Local Authority.

Depending upon where the applicant applies there may be lawful sharing of the application data between one or more of these local authorities and respective schools. If a school place has been requested outside of these local authorities, the data will be shared with the local authority of where the school is located.

**Transfer of Personal Data Outside the EEA (European Economic Area).** There is no personal data involved in eAdmissions transferred outside the EEA.

**Sensitive Personal Data.** The Sensitive Personal Data collected and processed under the admissions process are necessary for the carrying out the obligations of schools and local authorities.

**Retention of Personal Data.** The data collected to support eAdmissions is held for 3 years after the application. This is to support any appeals by you and investigations by LAs.

**Data Subject's Rights.** Under data protection legislation you have a number of Rights which we have outlined below:

- **Right of Access.** You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This should be achieved through submitting a Subject Access Request (SAR) to the Data Controller, which is the home Local Authority. If you are a data controller of this system and require any assistance, please log this via the LGfL support website at [support.lgfl.net](https://support.lgfl.net). In summary, you have the right to obtain:
  - Confirmation that your data is being processed;
  - Access to your personal data (a copy); and
  - Other supplementary information, which corresponds to the information in this Privacy Notice.

**Fees and Timings.** This information will be provided without charge; without delay and within one month. If an extension is required or requests are considered manifestly unfounded or excessive, in particular because they are repetitive, LGfL may choose to: charge a reasonable fee taking into account the administrative costs of providing the information; or refuse to respond. The reasons for this will be formally notified to you and your rights to appeal to the appropriate Supervisory Authority, i.e. UK Information Commissioner's Office (ICO) <https://ico.org.uk> will be highlighted.

**Identify Verification.** To protect your personal data, LGfL will seek to verify your identity before releasing any information, which will normally be in electronic format.

- **Right of Rectification.** You are entitled to have personal data rectified if it is inaccurate or incomplete. This can be achieved directly through logging into the LGfL USO account and amending the details about yourself. Alternatively, once the admissions annual process has been closed it is best to approach your Home Local Authority to make any changes. LGfL will support your request under instruction from the relevant Local Authority or school, so you should have a response within one month of your request. In the unlikely event LGfL does not take action to the request for rectification, LGfL will inform you of your rights to complain or seek judicial remedy.
- **Right of Erasure.** You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute '*right to be forgotten*,' especially once the e-Admissions processing has started. However, you do have a right to have personal data erased and to prevent processing in specific circumstances:
  - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
  - When you withdraw consent (and this is the basis of processing);
  - When you object to the processing and there is no overriding legitimate interest for continuing the processing;
  - The personal data was unlawfully processed;
  - The personal data has to be erased in order to comply with a legal obligation; and
  - The personal data is processed in relation to the offer of information society services to a child. However, you should note LGfL provide educational services which may not be considered information society services.
- **Right to Restrict Processing.** When processing is restricted, LGfL is permitted to store the personal data, but not further process it. In this event exactly what is held and why will be explained to you.
- **Right to Data Portability.** You may request to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The Right to Data Portability only applies:
  - To personal data you have provided to LGfL;
  - Where the processing is based on your consent or for the performance of a contract; and
  - When processing is carried out by automated means.

In these circumstances LGfL will provide a copy of your data in CSV format free of charge, without undue delay and within one month. If there is a delay to this, you will be informed.

- **Right to Object.** You have the right to object to:
  - Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
  - Direct marketing (including profiling); and
  - Processing for purposes of scientific/historical research and statistics.
  
- **Automated Decision Making and Profiling.** LGfL does not employ any automated decision-making or conduct profiling of Data Subjects.

**Cookies.** This section outlines the type of cookies we apply to our eAdmissions website [www.eAdmissions.org.uk](http://www.eAdmissions.org.uk) and the services we offer. By using the website, you agree your personal information will be handled as described in this Privacy Notice. The cookies we may use on our website are described as below:

**Strictly Necessary Cookies** - These are cookies that allow you to use different parts of our website. Without them different features that you have requested cannot be provided. These are usually set in response to an action performed by the user like clicking on a link or failing to enter the correct password to your account.

**First Party Cookies** - These are cookies that are set by our website. And only we can read them.

**Session Cookies** - These are stored while you browse our site and then deleted once you leave.