

# The Inclusive Learning Federation

## Privacy Notice for Volunteers – How we use your information 2023/24

### Who are we?

The Inclusive Learning Federation is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

The Inclusive Learning Federation's schools (Priory Common School, Bradwell Village School & Romans Field School) are registered as the Data Controller with the Information Commissioner's Office (ICO).

You can contact The Inclusive Learning Federation as the Data Controller in writing at:

Romans Field School, Shenley Road, Bletchley, Milton Keynes, MK3 7AW or [admin@rfs.ilf.education](mailto:admin@rfs.ilf.education)

### What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our volunteers.

### What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

### What personal information do we process about volunteers?

The personal data that we may collect, use, store and share (where appropriate) about you includes:

- Full name

- Car registration
- Contact details and contact preferences
- Evidence that the individual holds an Enhanced Disclosure and Barring Service certificate
- Photographs
- CCTV images captured in school

We may also collect, hold and share the following “special categories” of more sensitive personal information:

e.g. Information about your health or any relevant disabilities.

### How is your personal information collected?

We collect personal information about visitors when you sign into our school premises. This information is stored within our electronic signing in system.

We may also collect information ahead of your visit to our school, which we collect directly from you or the person arranging your visit.

### Collecting volunteer information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

### What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

#### 1) To comply with the law

We collect and use general purpose information in order to meet certain legal requirements and legal obligations placed upon The Inclusive Learning Federation by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

#### 2) To protect someone’s vital interests

We are able to process personal information when there is an emergency and/or where a person’s life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

#### 3) With the consent of the individual to whom that information ‘belongs’

Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these

circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

### Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- Explicit consent of the data subject
- Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
- Processing relates to personal data which is manifestly made public by the data subject
- Necessary for establishing, exercising or defending legal claims
- Necessary for reasons of substantial public interest
- Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables below.

### Who might we share your information with?

We routinely share volunteer information with:

- our Local Authority
- the Department for Education (DfE)

We do not share information about our volunteers unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

### What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Inclusive Learning Federation monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

### How long do we keep your information for?

In retaining personal information, The Inclusive Learning Federation complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which The Inclusive Learning Federation are required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

### Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

### What are your rights with respect of your personal information?

Under Data Protection Law, volunteers have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk) or alternatively;

School Data Protection Officer  
Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
Market Square  
Warwick  
CV34 4RL

**\*\*Please ensure you specify which school your request relates to.\*\***

Bradwell Village School  
Priory Common School  
Romans Field School

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

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 <https://ico.org.uk/concerns/>

## Review

The content of this Privacy Notice will be reviewed September 2024.

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Volunteer information, including personal details, DBS checks	Education Act 2005, Section 114 and accompanying regulations		Secretary of State, Local Authority, Disclosure & Barring Service	Legal Obligation
School workforce Census including volunteer personal details	Education Act 2005, Section 114 and accompanying regulations		Department of Education	Legal Obligation
School workforce Census – Volunteer Ethnicity	Education Act 2005, Section 114 and accompanying regulations	Consent	Department of Education	Legal Obligation
Accident Records	Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)		Health & Safety Executive, and Local Authority Health & Safety team (where necessary)	Legal Obligation
Individual Volunteer Health & Safety Risk Assessments and Personal Emergency Evacuation Plans (PEEP)	Health and Safety at Work etc Act 1974 and accompanying legislation		Not shared externally	
Qualifying Complaint Information	Education Act 2005, Section 11B		Chief Inspector	Legal Obligation
Verification of Right to work in the U.K (Single Central Record)	Immigration, Asylum and Nationality Act 2006, Section 15		Local Authority, Ofsted	Legal Obligation

Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent OR  Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance  Responsible/First aid trained staff on residential trips	Vital Interest
Volunteer Dietary Requirements (food allergies)	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance	Vital Interest
Medical Conditions & Volunteer Emergency Contact Details	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance  Responsible/First aid trained staff on residential trips	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics/ambulance	Vital Interest

Table 3 - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Photographs	Local Press/Media, Staff Medical Noticeboard, Parents & Community (Newsletter, School Website, Facebook, Annual Prospectus, Internal school displays, staff photo board).	Consent

Volunteer Email  
address and  
mobile number

Parents, and other members of staff

Public Task