The Inclusive Learning Federation

Privacy Notice for Applicants – How we use your information 2026/27

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 .

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 job applicants.

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 data 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.

Criminal offence data includes information about criminal convictions, cautions and alleged offences, and information about DBS checks.

What personal information do we process about applicants?

The categories of applicant information that we collect, hold and share include:

- The information you have provided on your application form, including name, title, address, telephone number, personal email address, date of birth, gender, teacher number, employment history, qualifications, subjects taught and other training and development activities.

- Any test results which arise as part of this application process.
- Information about your current level of remuneration, including benefit entitlements.
- Information provided to us by your referees.

Where you have named referees on your application form, we shall assume that they have consented to being approached by us.

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

- information such as gender, age, ethnic group, religious belief, sexual orientation;
- Information about your health, including any medical condition, health and sickness records;
- Information about criminal records;
- Information about being barred from working with children or vulnerable people
- Any information you provide to us during an interview.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the job applicant.
- Disclosure and Barring Service (DBS) in respect of criminal convictions and information about being barred from working with children or vulnerable people (once a job offer has been made).
- From former employers (once a job offer has been made).
- other checks as required for the role (for example right to work)

For what purposes do we use applicants' personal information?

We will use your personal information to:

- assess your skills, qualifications and suitability for the role
- carry out background checks
- communicate with you about the process
- keep records relating to recruitment
- comply with legal, regulatory and safeguarding requirements
- make reasonable adjustments where needed

If you fail to provide information that is necessary to consider your application (for example evidence of qualifications or work history), we may be unable to progress your application.
Equality monitoring information (where provided) is used to help us meet our equality duties and to monitor and report on equal opportunities.

Lawful bases for processing (UK GDPR)

Data protection law requires us to have a lawful basis to process your personal information.

Personal data (UK GDPR Article 6)

We process personal data about applicants under one or more of the following lawful bases:

- **Article 6(1)(b) – Contract:** processing is necessary to take steps at your request prior to entering into a contract (for example, to consider your application and make an offer).
- **Article 6(1)(c) – Legal obligation:** processing is necessary for us to comply with the law (for example, right to work and safeguarding-related requirements).
- **Article 6(1)(e) – Public task:** processing is necessary for us to perform a task in the public interest or in the exercise of official authority (for example, recruiting staff to operate and run our schools).

Special category personal data (UK GDPR Article 9)

Where we process special category data, we will also rely on an Article 9 condition, such as:

- **Article 9(2)(b)** – processing is necessary for carrying out obligations and exercising specific rights in employment and social security/social protection law (for example, to make reasonable adjustments)
- **Article 9(2)(g)** – processing is necessary for reasons of substantial public interest (for example, equality monitoring), with a basis in UK law
- **Article 9(2)(h)** – processing is necessary for occupational medicine/assessment of working capacity (where applicable)

We also meet additional requirements under the Data Protection Act 2018 (including Schedule 1 conditions) where these apply.

Criminal offence data (UK GDPR Article 10)

Where we process criminal offence data (including DBS information), we will do so in line with **Article 10** and the Data Protection Act 2018, where it is authorised by UK law and necessary for employment and safeguarding purposes.

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Who might we share your information with?

We may share applicant information with members of our staff who are involved in the recruitment process such as HR and managers who hold vacancies.

We may also share information with third parties where necessary for recruitment, employment and safeguarding checks and/or where required by law, such as:

- referees and previous employers
- the Disclosure and Barring Service (DBS) (where a DBS check is required)
- occupational health (where used)
- professional bodies/regulators (where relevant to the role)
- our data protection officer/provider (where needed to handle data protection requests)
- Third parties will only process personal information on our instructions and are subject to a duty of confidentiality.

How do we keep your information secure?

Appropriate security measures have been put in place to prevent personal information being accidentally lost, used or accessed in an unauthorised way.

Procedures are also in place deal with suspect data security breaches, and you will be notified of a suspected breach where we have a legal obligation to do so.

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.

How long do we keep your information for?

We retain applicant information in line with our retention schedule, which reflects the **Information and Records Management Society (IRMS) Schools Toolkit** and other legal requirements.

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

https://irms.org.uk/page/SchoolsToolkit

DBS Checks, Barring Information and Safeguarding Vetting

Where a role requires it, we will carry out a criminal records check through the Disclosure and Barring Service (DBS) as part of our safer recruitment and safeguarding obligations. This may include an enhanced DBS check, a barred list check, or other recruitment checks required by law and statutory guidance.

What information do we collect?

Where relevant to the role, we may collect and process information relating to:

- **criminal convictions, cautions, reprimands and warnings;**
- **information provided by the Disclosure and Barring Service (DBS);**
- **barred list status;**
- **safeguarding declarations and self-disclosures;**
- **identity, right to work and other pre-employment verification information.**

We will only request criminal records information where this is lawful, proportionate and relevant to the role applied for.

How do we use DBS information?

DBS and related criminal offence information is used solely for the purposes of:

- **assessing suitability for employment;**
- **meeting our legal and safeguarding obligations;**
- **protecting children, young people and vulnerable individuals;**
- **determining eligibility for work in regulated activity.**

Any decision made following the receipt of DBS information will be fair, proportionate and based on the specific circumstances of the role and the information disclosed.

Who has access to DBS information?

Access to DBS and criminal offence information is strictly limited to authorised staff who require access as part of the recruitment, safeguarding or human resources process.

Individuals handling DBS information are required to maintain confidentiality and comply with data protection legislation and the Federation's information security procedures.

How is DBS information stored and retained?

DBS information is stored securely and protected against unauthorised access, loss, misuse or disclosure.

We will only retain DBS information for as long as necessary to fulfil the purpose for which it was obtained and in accordance with our retention schedule, DBS guidance and applicable data protection legislation. Once no longer required, information will be securely destroyed or deleted.

Use of External Providers and Umbrella Bodies

The Federation may use third-party providers, including DBS umbrella bodies, recruitment systems or vetting providers, to assist with recruitment and safeguarding checks.

Where such providers are used:

- **personal information will only be shared where necessary;**
- **information will be processed in accordance with contractual and legal requirements;**
- **providers must implement appropriate technical and organisational security measures;**
- **providers may only process information on our instructions and must keep it confidential.**

Barring Referrals

In certain circumstances, the Federation has a legal duty to make a referral to the Disclosure and Barring Service (DBS) where safeguarding legislation requires this.

Where a referral is made:

- **only information that is necessary, relevant and proportionate will be submitted;**
- **reasonable steps will be taken to ensure the information provided is accurate and supported by appropriate evidence;**
- **information will be shared only with those organisations that have a lawful basis to receive it;**
- **records of the referral process will be maintained securely and in accordance with our retention requirements.**

Your Rights

Information relating to DBS checks and criminal offence data is processed in accordance with UK data protection legislation, including Article 10 of UK GDPR and the Data Protection Act 2018. Applicants have the same data protection rights in relation to this information as set out elsewhere in this Privacy Notice.

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, applicants 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 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 June 2027