

Waltham Forest Adult Learning Service Data Protection Policy (2026/27)

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Table of Contents

1. Introduction
 2. Our Role in Data Protection
 3. Legal Bases for Processing Personal Data
 4. Personal Data We Collect
 5. Purposes for Which We Use Personal Data
 6. Photography, Video and Written Testimonials
 7. Data Sharing
 8. Data Retention
 9. Individual Rights
 10. Automated Decision-Making
 11. Marketing and Communications
 12. Data Security
 13. International Data Transfers
 14. Contacting Us
 15. Policy Review
- External References

1. Introduction

Waltham Forest Adult Learning Service (WFALS) is committed to protecting the privacy and security of all personal information it collects and processes. WFALS complies with current United Kingdom data protection law, including:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025, most provisions effective from 5 February 2026
- Privacy and Electronic Communications Regulations (PECR)

This policy explains the personal data we collect, how we use it, who we share it with, how long we keep it and the rights of individuals.

2. Our Role in Data Protection

2.1 WFALS as Data Controller

WFALS (as part of the London Borough of Waltham Forest) is the Data Controller for most adult learning activities. We determine how and why we use personal information for education, training and service administration.

2.2 External Data Controllers

Some of the information we collect must be shared with statutory bodies that act as Data Controllers for their systems:

- Department for Education (DfE) — Data Controller for learner information when it is processed through:
 - the Individualised Learner Record (ILR)
 - the Learning Records Service (LRS)
 - the creation and maintenance of Unique Learner Numbers (ULNs)
 - the Personal Learning Record (PLR)
- Greater London Authority (GLA) — Data Controller for the Adult Education Budget (AEB), using learner information provided through national ILR systems.

WFALS may act as a Data Processor when required under funding contracts.

3. Legal Bases for Processing Personal Data

WFALS uses personal data under the following lawful bases:

3.1 Public Task

To deliver adult education as a public service, and to comply with statutory requirements including ILR submissions, AEB reporting and funding rules.

3.2 Legal Obligation

To meet audit, safeguarding, employment and financial reporting requirements.

3.3 Contract

To manage enrolment, tuition, payment and delivery of fee-paying courses or services.

3.4 Legitimate Interests

To improve the service, conduct research, maintain internal records and deliver limited marketing about similar courses.

From February 2026, UK law recognises new “recognised legitimate interests” that simplify some types of processing.

3.5 Consent

Used only when necessary, such as:

- photography, video or testimonials
- optional surveys
- certain email/SMS marketing activities

Individuals may withdraw consent at any time.

4. Personal Data We Collect

WFALS may collect the following categories of data:

4.1 Personal Identifiers

- Name
- Address and contact details
- Date of birth
- Residency information
- Employment status
- National Insurance number (for some funders)

4.2 Learning Records Service (LRS) Information

WFALS uses the Learning Records Service to:

- verify or obtain the Unique Learner Number (ULN)
- update and contribute to the Personal Learning Record (PLR)

4.3 Special Category Data

- Ethnicity
- Disability and additional learning support needs

- Health-related information where relevant
- Safeguarding information

4.4 Learning-related Information

- Attendance, progress and achievement
 - Course fees, waivers and funding eligibility
 - Exam entries and results
 - Learner support information
 - Case studies (with consent)
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5. Purposes for Which We Use Personal Data

We use personal information to:

- deliver and support adult learning programmes
 - submit required data to the DfE and GLA through the ILR
 - obtain and maintain ULNs and PLRs
 - assess eligibility for funded programmes
 - arrange and manage exams, assessments and certification
 - support learner wellbeing and safeguarding
 - carry out internal research for service improvement
 - provide information about similar courses or events (where legally allowed)
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6. Photography, Video and Written Testimonials

WFALS will only take or use photographs, video recordings or written comments for publicity or marketing where the individual has provided explicit signed consent.

Separate forms exist for adults and for learners under 18.

Images and recordings will be securely deleted three years after the date of consent.

7. Data Sharing

WFALS only shares personal information when required by law, funding bodies or where it is necessary for delivering education services.

7.1 Statutory and Funding Bodies

We share learner information with:

- Department for Education (DfE) for ILR returns, funding, research and evaluation

- Greater London Authority (GLA) for Adult Education Budget administration
- Learning Records Service for ULN and PLR updates

7.2 Other Organisations

Where relevant and lawful, we may also share data with:

- Ofsted
- Awarding bodies
- Qualification and regulatory agencies
- Other local authority teams (e.g. safeguarding)
- Organisations conducting research or evaluation of government-funded programmes
- Contractors providing education-related services under agreement (e.g. examinations providers)

WFALS does *not* sell personal data.

8. Data Retention

WFALS keeps personal data only for as long as necessary under relevant legislation and funding rules. Key retention periods include:

- ILR data: retained by the DfE for 20 years for operational purposes, and then up to age 80 for research databases
- AEB-funded learning: retained according to GLA and ESF match-funding requirements, which may extend beyond 2030
- Financial and administrative records: usually 6–7 years
- Images and recordings: deleted after 3 years

WFALS will retain data only for as long as necessary for its purpose.

9. Individual Rights

Under UK data protection law, individuals have the right to:

- access their personal data
- request correction of inaccurate information
- request deletion (where applicable)
- restrict processing
- object to certain types of processing (including marketing)
- request human review of automated decisions

- withdraw consent at any time
- request data portability

Requests will be handled within legal timeframes.

10. Automated Decision-Making

WFALS may use automated processes to assess eligibility or allocate support.
Under updated 2026 legislation, individuals have the right to:

- ask for a human review
- challenge any decisions
- receive an explanation of the decision process

WFALS does not carry out solely automated decisions with significant effects unless required by law and with safeguards in place.

11. Marketing and Communications

WFALS may send information about courses similar to those a learner has previously attended, using legitimate interest or consent where required.

Anyone may opt out of marketing communications at any time.

12. Data Security

WFALS uses secure systems, controlled access, encryption and trained staff to protect personal information.

All third-party systems must meet UK GDPR and local authority security standards.

13. International Data Transfers

WFALS does not routinely transfer data outside the UK.

If required, transfers will only take place with legally approved safeguards.

14. Contacting Us

The Information Officer

Waltham Forest Town Hall
Forest Road
London
E17 4JF

Website and contact details:

walthamforest.gov.uk

Email: information.officer@walthamforest.gov.uk

For ILR, ULN and PLR information held by the Department for Education, please refer to the DfE's ILR and LRS privacy notices (links below).

15. Policy Review

This policy is reviewed annually or when major legal or funding changes occur.

This version reflects the 2026 UK data protection updates, including changes under the Data (Use and Access) Act 2025.

External References

1. Data (Use and Access) Act 2025 – ICO statement (5 Feb 2026)

<https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2026/02/statement-on-the-commencement-of-the-data-use-and-access-act-duaa/>

2. DfE ILR Privacy Notice (2024–2025)

Explains how the DfE uses ILR learner data.

<https://guidance.submit-learner-data.service.gov.uk/24-25/ilr/ilrprivacynotice>

3. GLA Adult Education Budget Privacy Notice

Outlines how the GLA processes learner data shared by the DfE.

https://lbwfadultlearning.co.uk/pdf/GLA_Greater-London-Authority-Privacy-Notice_2022-23.pdf

4. Learning Records Service – ULN and PLR Information (2025–26)

<https://guidance.submit-learner-data.service.gov.uk/25-26/ilr/entity/Learner/field/ULN>