

# Include Wales

## WORKFORCE PRIVACY NOTICE

**Last updated: January 2026**

**Classification: Official**

Catch22 is committed to protecting your personal information and ensuring transparency about how we use it. This Privacy Notice explains how we collect, store, use, and share personal data relating to the **Include Wales workforce**, including staff, volunteers, contractors, trainees, and agency personnel.

Catch22 is the **data controller**, responsible for determining how and why your personal data is processed.

**Data Protection Officer (DPO):** Michael Oniyitan

Contact: [DPO@catch-22.org.uk](mailto:DPO@catch-22.org.uk)

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### 1. The Personal Data We Hold

We may collect, store, use, and share the following categories of personal information about you:

#### Standard personal data

- Contact details
- Date of birth and gender
- Next of kin and emergency contacts
- Job title, role, responsibilities, service area and employment status
- Salary, annual leave, pension and benefits information
- Bank account details, payroll and tax information
- Professional qualifications, training records, employment history
- Recruitment records (e.g., right-to-work checks, references, application forms)

- Performance and appraisal information
- Information relating to disciplinary, grievance, or capability procedures
- Absence information (including sickness and family leave)
- Photographic ID, staff identifiers (e.g., fob ID, staff number), IP address
- CCTV images (where applicable)
- Data relating to use of Catch22 systems and devices (audit logs, access logs)

### **Special category data (more sensitive information)**

Where applicable and only where lawful to do so:

- Race or ethnicity
- Religious or philosophical beliefs
- Trade union membership
- Disability and health records
- Safeguarding and child protection-related information (where relevant to your role)

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## **2. Purposes for Processing Your Information**

We use your personal data to:

- Maintain a complete and accurate workforce record
- Deliver HR, payroll, pensions, and workforce administration
- Manage recruitment, onboarding, training, and development
- Support health, safety, safeguarding, and wellbeing
- Manage performance, conduct, and capability processes
- Fulfil contractual, legal, and regulatory obligations

- Ensure the security of systems, people, and premises
  - Support service planning, quality assurance, and reporting
  - Comply with statutory reporting (including to HMRC, DfE where applicable, and local authorities)
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### 3. Legal Basis for Processing

We rely on the following lawful bases under UK GDPR:

#### Article 6 UK GDPR

- **6(1)(b) – Contract:** to fulfil your employment or engagement contract
- **6(1)(c) – Legal obligation:** including employment law, taxation, safeguarding, and education regulations
- **6(1)(f) – Legitimate interests:** for organisational management, service improvement, safeguarding, security

#### Article 9 UK GDPR – Special category data

- **9(2)(b):** employment, social security and social protection law
- **9(2)(a):** explicit consent (only where consent is sought)
- **9(2)(g):** substantial public interest (e.g., safeguarding)
- **DPA 2018 Schedule 1 Parts 1 & 2** (e.g., health and safety, safeguarding, equal opportunities)

Where consent is used, you will be told, and you may withdraw it at any time.

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### 4. Collecting Your Information

Some information is mandatory for employment or statutory reporting; other information is provided voluntarily. Where information is optional, this will be clearly explained.

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## 5. How We Store Your Data

Your personal information is stored securely within Catch22 systems, including:

- **iTrent (HR database)**
- **CPOMS StaffSafe**
- **Secure local records where appropriate (e.g., Bound & Numbered Book)**
- **Approved workforce systems used by Include Wales**

All data is retained in line with the **Catch22 Data & Record Management Retention Schedule**, available on 4Policies.

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## 6. Sharing Your Information

We may share your information with:

- Catch22 departments and associated companies
- Local authorities (England or Wales, depending on commissioning)
- The Department for Education (where statutory obligations apply)
- Funding or grant-making bodies
- Regulatory bodies (e.g., HMRC, ICO)
- Pension administrators, auditors, payroll and benefits providers
- Research or reporting organisations under strict conditions
- External authorities where required by law (e.g., safeguarding, police requests)

We never share your information without a lawful basis and never for marketing purposes.

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## 7. Your Rights

Under data protection law, you have the right to:

- Request access to your personal data
- Request rectification, deletion, or restriction of your data
- Object to certain types of processing
- Request that automated decisions affecting you be reviewed
- Raise a concern with Catch22 or the **Information Commissioner's Office (ICO)**

To exercise your rights, contact: **DPO@catch-22.org.uk**

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

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## 8. If We Change How We Use Your Data

If we need to use your personal data for a new purpose, we will provide updated information before processing begins.

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## 9. Contact

For questions, concerns, or to exercise your rights, contact:

**Data Protection Officer**  
Catch22  
Email: **DPO@catch-22.org.uk**