

# Include Wales

## STUDENT PRIVACY NOTICE

Include Wales – Student Privacy Notice  
Last updated: January 2026

### 1. Introduction

Include Wales is committed to protecting your personal information. This privacy notice explains how we collect, use, store, and share information about students. Catch22 is the data controller. Contact the Data Protection Officer at [DPO@catch-22.org.uk](mailto:DPO@catch-22.org.uk).

### 2. Why we collect and use personal information

We collect student data to:

- Support learning and monitor progress
- Provide pastoral care and protect welfare
- Meet legal and safeguarding duties
- Assess school performance
- Comply with statutory reporting requirements

### 3. Types of information collected

We may collect:

- Personal details (name, DOB, contact details, UPN)
- Characteristics (ethnicity, language, nationality, FSM eligibility)
- Attendance records and exclusions
- Educational attainment and assessment history
- SEN, medical, behavioural, and safeguarding information
- Looked-after child status
- Criminal offence data (only where legally required)
- Photos, videos, CCTV images

### 4. Legal basis for processing student data

We process student data under:

- Legal obligation (Education Acts, safeguarding laws)
- Public task (delivering education)
- Vital interests (protecting life or wellbeing)
- Consent (for optional activities such as photos)

Special category data is processed under:

- Substantial public interest (safeguarding, equality)
- Health and social care purposes
- Explicit consent where required

## 5. How we collect information

Most information is provided by you, the local authority, or previous schools. Some is mandatory; optional data will always be identified.

## 6. How we store your data

We store data securely in Catch22 systems and retain it according to our retention schedule. Most student records are kept until age 25.

## 7. Who we share information with

We may share data with:

- Local authorities
- The Department for Education (DfE)
- Exam bodies
- Ofsted
- Health and social care partners
- Police and safeguarding partners
- Youth support services (for ages 13+)
- Service providers acting under contract

We share data only when legally permitted.

## 8. National Pupil Database (NPD)

Statutory data collections may be sent to the DfE and included in the NPD for research and statistical purposes.

## 9. Your rights

You have the right to:

- Request access to your data
- Request correction or deletion (where allowed)
- Object to certain processing
- Restrict processing
- Challenge automated decisions
- Complain to the ICO

## 10. Contact

For questions, contact: [DPO@catch-22.org.uk](mailto:DPO@catch-22.org.uk).

We update our privacy notice from time to time. This version was last updated January 2026.