

1. IMPORTANT INFORMATION

Merthyr Tydfil County Borough Council is responsible for deciding how we hold and use personal data we collect. We are committed to protecting your personal data and complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We are registered with the Information Commissioner’s Office (ICO) under registration number Z5957136.

It is important that you read this privacy notice together with our [Privacy Standards Policy and full privacy notice](#) which contains more detailed information about our data processing and can be accessed on our website.

This privacy notice provides information on how we use your personal data for The Inspire2 Achieve (I2A) project is part of Merthyr Tydfil Youth Services and is funded by the UK Shared Prosperity Fund (UKSPF). I2A supports young people aged 10 to 19 to stay in education, build confidence, and prepare for their future, whether that’s further learning, training, or employment. The Summer Engagement Programme is designed for small groups of Year 6 pupils who are about to move up to secondary school. It offers fun, supportive activities to help them feel more confident and ready for the transition in September.

2. WHO WE ARE

Merthyr Tydfil County Borough Council is the data controller therefore we are responsible for the personal data we hold. The Council is made up of different departments, details of which can be found on our [website](#). When we mention the Department, we are referring to the Inspire2Achieve Team who is responsible for processing your data for the services detailed in this privacy notice.

The Summer Engagement Programme is aimed at young people aged 10–11 who are currently in Year 6 (the final year of primary school).

Merthyr Tydfil County Borough Council has appointed a Data Protection Officer who can be contacted using the details at the top of this notice.

3. WHAT PERSONAL DATA IS USED

We may collect, use, store and transfer different kinds of personal data about the young people accessing the programme, including:

- Personal descriptors - we may collect basic personal details such as your name, address, email address, telephone number, and date of birth. This information helps us register participants, keep in touch with families, and ensure the safety and wellbeing of everyone involved.
- Emergency contact details - such as the name, relationship, and phone number of a parent, guardian, or trusted adult. This is essential to ensure we can get in touch quickly if there is an emergency during the programme.
- Identification numbers - such are your pupil number or WCCIS number. These are used to help us accurately identify and support each young person, link with school or support services where appropriate, and ensure we are meeting reporting requirements.
- Education data - such as your qualifications, exam results, education history. This helps us understand your learning journey, identify any support needs, and tailor our interventions to help you succeed.

We may also use and store demographic data which provides context to your personal data, such as:

- Lifestyle data - we collect basic lifestyle information where it helps us understand how best to support a young person. This could include interests, hobbies, routines, or any challenges they may face outside of school. Gathering this information helps us tailor activities and support to meet individual needs and ensure every young person feels included and valued.
- Data that relates to a young persons family life - where it is relevant to their wellbeing, participation, or the support we provide. This could include details such as who lives at home, caring responsibilities, or any other factors that may affect their experience during the programme. This information helps us offer the right support and ensure a safe, inclusive environment.

We may also process more sensitive data such as:

- Cultural information - to ensure that all young people feel welcome, respected, and included, we may collect relevant data such as language preferences, dietary needs, or other cultural considerations. This helps us plan activities that are inclusive and sensitive to individual backgrounds. Any cultural information shared with us is handled with care and only used to support the wellbeing and participation of the young person during the programme.

There are special categories of more sensitive personal data which require a higher level of protection. We collect, store and use the following special categories of personal data about you:

- Medical information - to ensure the safety and wellbeing of all participants, such as details about asthma, allergies, or other health conditions. This information helps us plan appropriate support and respond effectively in case of emergencies, especially during off-site activities. Medical details are treated with strict confidentiality and only shared with staff or activity providers who need to know for safeguarding purposes.

We explain the different methods used to collect this data about you in section 4 of this privacy notice.

## 4. HOW YOUR PERSONAL DATA IS COLLECTED

We collect personal data about you through the Registration and consent forms. Please be aware that our consent forms relate to participation in the programme and does not relate to consent to process personal data we will only request consent to process personal data in relation to photographs, more information on this is provided in section 5. We also receive personal data from our direct communication with schools and parents or guardians. We will also collect your personal data during our observations and feedback during programme sessions.

We will input your personal data into the Inspire2 Achieve database where information is held for the purpose of Shared Prosperity Funding. The Department will also store data in the Council computer systems called Capita for those that have been enrolled into the I2A programme. Your personal data is stored on the Council's secure computer servers and only authorised personnel can access it. All personnel that have access to your personal data are provided with annual data protection and information security training.

We may sometimes collect additional personal data from trusted third parties, such as schools, other local authority services, or youth support organisations. This will include information that helps us better understand a young person's needs and provide appropriate support. Any data received from third parties is handled securely and used only for the purposes of delivering the I2A Summer Engagement Programme and related support.

We will collect additional personal data during our Council business functions and the services we provide to you throughout your contact with us. For more information about how your personal data is used in other service areas please visit our privacy notice [webpage](#).

## 5. LEGAL BASIS FOR PROCESSING

We will only use your personal data where the data protection legislation allows us to. These will include the provisions set out under the [General Data Protection Regulations](#) and where relevant the [Data Protection Act 2018](#). We will use your personal data in the following circumstances:

Article 6(1)(a) which relates to consent. This applies to optional elements of the programme, such as:  
Using photographs or videos for promotional or reporting purposes and sharing special category data where required (e.g. medical information).  
When we ask for your consent, we will explain clearly what it is for, and you have the right to withdraw your consent at any time without affecting your participation in the programme.

Article 6(1)(d) which relates to vital interests. In rare cases, we may need to process personal data to protect a young person's vital interests, for example, in a medical emergency or safeguarding situation. This may include sharing essential information such as medical conditions, emergency contact details, or other relevant data with healthcare professionals or emergency services. This is done only when absolutely necessary to protect the health or safety of the individual.

Article 6(1)(e) which relates to a public task. The Inspire2 Achieve (I2A) programme is a publicly funded initiative aimed at supporting young people's education, wellbeing, and transition into secondary school. Processing personal data is necessary to deliver this support effectively and meet our responsibilities as a local authority service.

In addition to the lawful bases under the UK GDPR, we may also process your data under the Recognised Legitimate Interests introduced by the Data (Use and Access) Act 2025. This includes processing for the purposes of safeguarding and responding to emergencies, where it is necessary and proportionate to do so.

## 6. SHARING YOUR PERSONAL DATA

We only share personal data when it is necessary to deliver the I2A Summer Engagement Programme safely and effectively. Your information may be shared with:

- Merthyr Tydfil schools involved in the programme (this includes both primary and secondary schools) to support your transition and ongoing education. The I2A project is specifically aimed pupils from the Pen-y-dre High School cluster of primary schools, which includes:
  - Dowlais Primary School
  - Gellifaelog Primary School
  - Goetre Primary School
  - Gwaunfarren Primary School
  - Pantysgallog Primary School
  - Ysgol-y-Graig Primary School

However, the I2A team are also working closely with the feeder schools for both Cyfarthfa High School and Afon Taf High School and the programme will be offered to the young people who may benefit from extra support as they prepare to move into secondary school.

- Merthyr Tydfil County Borough Council internal departments, where relevant to your support.
- Activity providers (e.g. outdoor education centres) to ensure your safety during off-site sessions.
- Emergency services or healthcare professionals if needed to protect your health or wellbeing.
- Programme funders (such as the UK Shared Prosperity Fund) for monitoring and reporting purposes.

There may be occasions when we must share your personal data with Welsh Government for statistical and analysis reasons. Welsh Government use personal data held by us to regulate how we discharge our public functions.

We will not transfer your data to any countries outside of the [European Economic Area](#). If we do, we will inform you as soon as possible and you can expect a similar degree of protection in respect of your personal data.

## 7. HOW LONG WE KEEP YOUR PERSONAL DATA

We will only retain your personal data for as long as it is needed to deliver the I2A Summer Engagement Programme and meet our legal and reporting responsibilities. In most cases, this means your data will be kept for up to 6 years after the programme ends, in line with Merthyr Tydfil County Borough Council's retention schedule and UK Shared Prosperity Fund (UKSPF) requirements. After this date, your personal data will be securely destroyed or anonymised.

Details of retention periods for different aspects of your personal data are available in our Records Management Policy which is available on our website ([www.merthyr.gov.uk](http://www.merthyr.gov.uk)).

## 8. HOW WE KEEP YOUR PERSONAL DATA SECURE

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, accessed, altered, or disclosed in an unauthorised way. We limit access to your personal data to those employees who have a business need to know. Our employees will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. You can find out more about how we keep your personal data secure by contacting our Information Security Officer on [information.security@merthyr.gov.uk](mailto:information.security@merthyr.gov.uk).

## 9. YOUR LEGAL RIGHTS

In certain circumstances, you have rights under data protection laws in relation to your personal data. These are outlined in the GDPR and include:

- The right to Rectification – you have the right to ask to have your information corrected.
- The right to Restrict processing may apply – you may request that we stop processing your personal data however, this may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to Object – this is not an absolute right and will depend on the reason for processing your personal information.
- The right to Erasure - you may request that we erase your personal data however, this may delay or prevent us delivering a service, or continuing to deliver a service. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to not be subject to Automated decision making and profiling.
- The right of Access – you have the right to ask us for copies of your personal data. To make a request, please contact the Information Governance Team.
- The right to Complain – you have the right to complain about how your personal data is used. To make a complaint please contact the Information Governance Team.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if you make any changes to your personal data so that we can update our records.

If you want to review, verify, correct, request erasure, object, or request that we transfer a copy of your personal data to another party, please contact the Data Protection Officer in writing using the contact details provided at the top of this notice.

## 10. FURTHER DETAILS

You also have the right to make a complaint at any time to our Data Protection Officer, whose contact details are provided above, or the Information Commissioner's Office, the UK supervisory authority for data protection issues:

Address: Information Commissioner's Office (Wales), 2<sup>nd</sup> Floor, Churchill House, Churchill Way, Cardiff, CF10 2HH  
Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)  
Tel: 0330 414 6421

If you are looking for more information on how we process your personal data including data security, data retention, individual rights please access our [full privacy policy](#). You can also obtain information directly from Information Commissioners Office [website](#), [www.ico.org.uk](http://www.ico.org.uk).

Please note, our privacy notice's do not form part of any contract to provide services. We may update this notice at any time if we do, we will ensure that an updated copy of this notice is made available to you as soon as reasonably practical.



Mae'r ddogfen hon hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.