



Llywodraeth Cymru
Welsh Government



Medr & WG Privacy Policy 2026-2027

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1. Privacy Notice – Introduction:

Educ8 Training Group (“**ETG**”) is one of the largest independent training providers in England and Wales. All companies within the ETG group uphold the same company Vision, Mission and Core Values and follow our group policies and procedures.

At the date of this policy these companies are:

- Educ8 Training Group Limited, registered number 10865705.
- Aspire and Learn Ltd, registered number 08784755.
- Educ8 Ltd, registered number 05059754.

Any reference to “ETG” throughout this policy includes all the companies named above.

The learning programme you (or your employees) are about to enrol on is funded by Medr. Medr is the name for Wales’s Commission for Tertiary Education and Research.

Your participation in the programme is dependent on you, providing personal data. Under UK General Data Protection Regulation (UK-GDPR), the lawful basis we rely on to process your personal data is Article 6(1)(e) public task where processing is necessary for the performance of a task carried out in the public interest or the exercising of official authority.

This allows us to meet our legal duties and administer and monitor the funding we provide. Where you provide special category information, such as ethnicity, this will be processed for reasons of substantial public interest (under Article 9(2)(g)), and for archiving, historical research, and statistical purposes (under Article 9(2)(j)). Under the Data Protection Act 2018 (DPA-2018), special category data is processed under Schedule 1, Part 1, Paragraph 4, for archiving, historical research, and statistical purposes in accordance with Article 84B of the UK GDPR and is in the public interest, and Schedule 1, Part 2, Paragraph 6 for reasons of substantial public interest in the exercise of Medr’s statutory functions. A full list of special category data can be found in Part Two/Full Version of the privacy notice.

Medr will be the data controller for the personal information you provide from the 1st of April 2026, relating to apprenticeships, junior apprenticeships, further education, and adult community learning. Other information will be kept by Educ8 to administer the programme.

As your Apprenticeship programme is Medr funded, you may be asked by your learning provider to supply additional evidence such as a passport, recent payslip or qualification certificate to verify eligibility.

Jobs Growth Wales Plus (JGW+) is funded by the Welsh Government. Welsh Government will be the data controller for the personal information you provide from 1st April 2026,

1.1 What will Medr, Welsh Government and Educ8 use your information for?

Medr, Welsh Government and Educ8 uses your data for funding, planning and policy development as well as monitoring learner outcomes (such as achievement of qualifications, learner progress and destinations).

Additionally, your data will be used in official statistics and research about post-16 learning, including how health and individual circumstances affect the educational outcomes of learners in Wales. Our official statistics reports give an overall picture of learners in Wales, what they study, their achievements and their destinations after they leave learning. They include, for example, information on patterns in learners’ gender, ages, and the qualifications, subjects and levels they are studying. Individual learners cannot be identified in these publications.

As part of Jobs Growth Wales Plus (JGW+) employment strand, data will be used to determine Welsh Government wage rate subsidy payments whilst during the period of employment, to ensure the correct wage is being paid for the participant. Employer data will also be used to support, monitor and determine the destination of those participants through employment.

Research organisations will also use post-16 learner data to evaluate Welsh education policies and programmes. As part of these evaluations, they may also conduct optional learner surveys, which will assess the impact of a programme on the individual learner as well as contribute to future Welsh Government policy development.

In order for Medr and Welsh Government to evaluate the impact of its programmes on certain groups of learners, we will link your data with other educational records we hold, such as the Pupil Level Annual Schools Census, Welsh Examinations Database and Higher Education Statistics Authority. We use this linked data to help us understand the progress and outcomes of learners in Wales, to inform our research, performance measures and statistical publications. We may also share this linked data with researchers and with our partners, including Estyn and Qualifications Wales, to help them carry out their own data analysis to inform inspections and reviews. Individual learners cannot be identified in the linked data we share with our partners.

Who Medr and Welsh Government shares your data with and why

Please go to Part Two/Full Version of the privacy notice for a complete explanation of who we share your data with, how your data is shared and why.

2. Your rights and choices under the General Data Protection Regulation (GDPR) include:

- Access the personal data Medr, Welsh Government and Educ8 holds on you
- Require Medr, Welsh Government and Educ8 to rectify inaccuracies in that data
- Object to processing on grounds relating to your particular situation (in some circumstances)
- Restrict processing (in some circumstances)
- Have your data erased (in certain circumstances)
- Lodge a complaint with the Information Commissioner's office (ICO) who is the independent regulator for data protection

3. How long will Medr, Welsh Government and Educ8 keep your information?

Data Type	Data Retention Period	Data Uses
Further Education and Adult Learning Apprenticeship Commissioning Programme (ACP) Adult Community Learning	MEDR/Welsh Government - Data will be retained indefinitely	This enables Medr to analyse your data along with that of other learners and create reports. These reports will be used to help inform, influence and improve education policy decisions, monitor performance of the education service as a whole and/or to forecast future funding requirements. Under the Tertiary Education and Research (Wales) Act 2022, Medr is entrusted with a range of strategic responsibilities that require the indefinite retention of LLWR data. • Promoting lifelong learning: Retaining LLWR data enables Medr to track learner journeys over time, supporting its duty to promote lifelong learning. • Equality of opportunity: The rich information collected on learners and their characteristics contributes to the long-term monitoring of this. • Encouraging participation enables the longitudinal tracking of learner engagement, helping to identify patterns such as sustained participation, temporary disengagement, and re-entry into education later in life. This insight is essential for understanding and supporting lifelong learning pathways. • Contributing to a sustainable and innovative economy: Insights derived from long-term data analysis inform workforce development and economic strategy.

		Monitoring and promoting improvement in quality: Retained LLWR data supports Medr's ability to assess and improve the quality of education.
Apprenticeship Commissioning Programme (ACP)	Your record and data kept by Educ8 Training will be deleted after fifteen years.	This enables Educ8 Training, MEDR & Welsh Government to analyse learner data and create reports over a period of time. These reports will be used to help inform policy decisions or to forecast future funding. Data is kept so that it can be checked and audited. In the cases of programmes partially funded by the ESF then timescales for keeping data are decided by the European Union.
Jobs Growth Wales Plus (JGW+)	Your data will be deleted after ten years	This enables the Welsh Government to analyse learner data and create reports over a period of time. These reports will be used to help inform policy decisions or to forecast future funding. Data is kept so that it can be checked and audited. In the cases of programmes partially funded by the ESF then timescales for keeping data are decided by the European Union.

4. Contacts:

For further information about the information which Educ8 holds and its use, or if you wish to exercise your rights under the GDPR, please see contact details below: FAO: Data Protection Officer Educ8 Training Group Ltd Suite 10 Tredomen Gateway Tredomen Business Park Ystrad Mynach Caerphilly CF82 7EH dpo@educ8training.co.uk	As data controller, we are fully committed to the processing of your personal information in line with data protection legislation. We welcome any queries relating to the processing of your data and will listen to any concerns you may have. Please get in touch with us by email or post: Email: dataprotectionofficer@medr.cymru Write to: Data Protection Officer Medr 2 Capital Quarter, Tyndall Street Cardiff CF10 4BZ Our data protection registration reference is ZB552558
If you are unhappy with the way in which your personal information has been handled by Medr, please contact info@medr.cymru or our data protection officer and they will try to resolve your issue informally. If they are unable to resolve the issue to your satisfaction, you can also make a complaint to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office (ICO) and they can be contact at	
Information Commissioner's Office Wycliff House Water Lane Wilmslow Cheshire SK9 5AF Tel: 0303 123 1113 Email: casework@ico.org.uk Website: https://ico.org.uk	You can also contact the Wales ICO office: Information Commissioner's Office – Wales 2nd Floor, Churchill House Churchill Way Cardiff CF10 2HH Tel: 02920 678400 Email: wales@ico.org.uk

JGW+ Programmes Only

For further information about the information which Welsh Government holds and its use, or if you wish to exercise your rights under the UK GDPR, please write to us:

Data Protection Officer
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Email: Dataprotectionofficer@gov.wales or contact the information commissioner's office on the details above.

5. Notifications of changes:

This Privacy notice was last updated on 1st April 2026 and we keep it under regular review to make sure it is up to date and accurate. We will always notify you of changes to the use of your data via this Privacy notice and your provider. All of Medr's and Welsh Government's processing will comply with data protection legislation.

If you prefer not to supply your special category data at any time, you must contact your learning provider who will update your record.

Lifelong Learning Wales Record (LLWR) Privacy notice Part Two (Full Version)

It is mandatory that the LLWR Privacy Notice is seen by each learner during the enrolment process and for those learners that are currently in learning.

6. What personal information about you is collected and used by Medr & Welsh Government?

Personal data is collected by providers about you and sent to Medr and Welsh Government via the LLWR, the data collection system for Further Education, Adult Learning, Apprenticeship Commissioning Programme and Jobs Growth Wales Plus. As defined in the General Data Protection Regulation, your personal data is your:

- Unique learner identifier (created by Medr)
- Learner Identifier number (created by your learning provider)
- Surname
- Forename(s)
- Address
- Postcode
- Telephone number
- Email
- National Insurance Number
- Gender
- Surname at 16
- Date of birth
- National identity
- The last school you attended
- The year you left school
- A unique learner number (created by the Learning Records Service)
- Whether you are a migrant worker
- Learning Difficulty or Disability indicator
- Postcode (at start of learning programme)

Medr also processes special category data on learners':

- Ethnicity

- Disability type
- Health condition

Providing this data is optional.

Please see Annexe A for a list of the non-personal data fields Medr collect.

7. How will your data be used by Medr, Welsh Government and Educ8 internally?

- In evaluations of programmes and projects, to inform decision on future policies for post 16 learning.
- To measure the outcomes of post-16 learning, including learners' achievement of qualifications, progress and destinations.
- To allocate and monitor funding of post-16 learning.
- By Medr's and Welsh Government's auditors, who check data on a monthly basis to ensure that work based learning providers are delivering what's outlined in their contract or funding agreement with Medr and Welsh Government.
- To promote equality and diversity on post-16 learning across Wales, to help ensure that we comply with the Equality Act 2010.
- To produce anonymous official statistics on post-16 learning in Wales,
- To link to other datasets for statistical and research purposes, including the production of the Matched Education Dataset (MED). MED links to LLWR to the Pupil Level Annual Schools census, Educated other than at school census, Welsh examinations database, Post-16 Data Collection, and Higher Education Statistics Authority data, which in turn is used by Welsh Government to understand learners' progress through the education system and their destinations once they leave learning.

8. How will your data be used by Medr, Welsh Government and Educ8 and by whom externally?

- Medr links your data internally and with external government bodies such as The Welsh Government and Department for Work and Pensions, to evaluate the impact of learning programmes such as apprenticeships.
- By the Office for National Statistics (ONS), to publish aggregate statistics related to the economy, population and society at UK, Wales, and local levels. These statistics will be published in a manner that ensures it is not possible to identify individuals. One of the key ONS statistical products is the 2021 Census. The ONS will use the data to help improve the accuracy of the 2021 census. The ONS also use the data to undertake research, or to make de-identified data available to approved researchers (as defined in the Digital Economy Act), through their secure research environment. ONS statistical and research projects will involve linking data to other data sources to help understand the interaction between the education system and other issues such as health, well-being or the economy. All statistical and research work will be undertaken in a manner that includes checks being carried out to make sure that identities are not revealed by the results of the analysis.
- By the UK Government Department for Education, for use in the longitudinal Educational outcomes study (LEO). This involves education records being linked to employment, earnings and benefits records held by the Department for Work and Pensions, in order to identify and analyse the destinations of learners into further learning and/or employment once they have left learning. Welsh Government will analyse this linked data for statistical and research purposes. This will include using it to assess the effectiveness or policy in the area of education and training, for example, looking at how many people with particular qualifications go on to get specific jobs, comparing outcomes for people who go to different education or training providers or seeing whether particular schemes have achieved what they were supposed to achieve. (<https://www.gov.uk/government/organisations/departments-for-work-pensions/about/personal-informationcharter>),
- By Digital Health and Care Wales (DHCW), who will work with a Secure Research Environment, to link your data with other anonymised information about you which is available to the Welsh

Government, the NHS and other public organisation, making sure that identities are not revealed by the results of the analysis.

- By Swansea University, a Secure Research Environment where research can be done using anonymised information and where checks are carried out to make sure that identities are not revealed by the results of the analysis. Your name, address and postcode will remain separate from your data at all times and will not be available in the Secure Research Environment. The information is used for statistical and research purposes only. An example of the key research questions that are answered by this work is how health and individual circumstances affect the educational attainment of learners in Wales.
- By Qualifications Wales to carry out analysis of qualification enrolments and outcomes in post-16 providers. Data will be used to inform Qualifications Wales' programme of sector reviews and other research on post 16 qualifications. <https://www.qualificationswales.org/english/>.
- By Estyn (<https://estyn.gov.wales>), to undertake inspections of standards as part of the statutory duties to inspect post-16 providers. Analysis of this data is also used to inform inspection planning, thematic reviews and annual reporting.
- By Careers Wales to meet its objective of providing support to specific groups of individuals who are at a high risk of becoming disengaged from education, employment and training. To achieve this, LLWR data will be used to match to existing active Careers Wales client records. This means that some of the non-personal information provided to Careers Wales will be available to Careers Wales on a day-to-day basis. This will include course information, start date etc; Details of how Careers will use your information can be found in their privacy notice. <https://careerswales.gov.wales/about-us/privacy-notice>
- Research Organisations contracted by Medr and Welsh Government to undertake independent research, surveys or analytical activities to support the development, evaluation, and monitoring of education, skills labour market and related public policy areas in Wales and across the UK. To undertake evaluations of programmes such as Apprenticeships and JGW+. This may include contacting learners past and present to take part in surveys, although you will always have the option to take part or not in the survey if contacted.
- Accountants and auditors of further education funding, apprenticeship and JGW+ providers who ensure Medr and Welsh Government can assess whether data returned by institutions are a reliable basis for making funding decisions.
- By IFF Research (<http://www.iffresearch.com>) who undertake research surveys to provide an up to date picture of the pay of the apprenticeship population in Wales and across Great Britain and to assist with the development and monitoring of apprenticeships and national minimum wage policy

9. Data Sharing Agreements

Medr and Welsh Government have a formal data sharing agreement in place whenever we share your data with a third party. Part of the agreement means the third party will have to sign a confidentiality agreement in relation to your data to show that they operate satisfactory information security procedures, that they will only use your information in prescribed ways and that they will destroy their copies of your data when it is no longer needed.

10. Security Arrangements for your data held by Medr & Welsh Government

Medr and Welsh Government know how important it is to protect and manage your personal information. They have established physical, technical and organisational security measures to assist with this. Some of the measures they have taken include:

- adopting computer safeguards such as firewalls, encryption, secure transfer protocols, penetration testing, complex security credentials, multi-factor authentication protocols, and access controls including restricting access depending on job responsibilities
- Cyber Essential certification and ongoing compliance against Government and industry recognised security frameworks
- a comprehensive framework of policies relating to data protection, information security and records management
- regular training and awareness sessions for our employees to ensure understanding and compliance across the

organisation

- maintenance of a data protection register that identifies all personal information held and includes details such as lawful basis for processing, location, security measures and retention
- data sharing agreements and relevant clauses in contracts that have personal data implications
- privacy notices so that individuals are aware of what personal information we hold and why
- data protection impact assessments undertaken to identify risks and ensure compliance with data protection legislation, and
- data stored within the UK and not transferred outside the European Economic Area (EEA). If there was a requirement to transfer personal information outside of the EEA, transfer would only be permitted to countries whose data protection laws have been assessed as adequate by the European Commission, and where adequate safeguards are in place to ensure compliance with relevant data protection regulations.

Summary of changes to the LLWR Privacy Notice between version 9.0 and 10.0

- Medr have become data controllers as of 1st April 2026
- Welsh Government have become data controllers for JGW+ as of 1st April 2026

Annexe A

Non personal data	Notes
Accreditation of prior experiential learning indicator	Recognises the skills and knowledge that the learner has already achieved towards a qualification.
Actual Asynchronous Hours	Records non-tutor led training hours
Actual Synchronous Hours	Records tutor led training hours
Actual work or centre based hours	Records how much time the learner has spent learning at an employer or at a college or other learning centre
Amended work or centre based guided contact hours	
Assessable learning	Whether learning is assessable, allowing identification of learning activities which should have linked awards (qualifications)
Attainment indicator	Record whether the learner has attained, partially attained or not attained the qualification
Award credit level/value	
Award entry identifier	Identifier for each award entry for this learning programme
Award learning aim reference	Identifier for learning activity drawn from Qualifications Wales or a Welsh Government defined generic code
Caring Responsibility	Records whether ESF-funded learners have caring responsibilities
Completion status	
Country of Domicile	
Credit level/value of learning activity	
Date commenced and terminated learning activity/programme	
Destination within three months of leaving	
Employer name/postcode	
Employment status at start of programme/before learning	
Employer ID	A unique ID allocated to the Employer by the Lead Contractor
Expected Asynchronous Hours	
Estimated Work /Centre Based Hours	Records an estimate of how much time the learner is likely to spend learning at an employer or at a college or other learning centre
Expected end date of learning activity	
Expected Synchronous Hours	
Furlough Indicator	
Hours worked per week	

Household Status	Records whether ESF-funded learners are from jobless households
Immediate Destination	Destination of learner within four weeks of leaving the programme
Individual development plan indicator	Records whether a learner has an individual development plan (IDP)
JGW+ activity descriptors	Records the activity descriptions for learners on the JGW+ programme
Learner Provision Funding	
Learning aim reference	Identifier for learning activity drawn from Qualifications Wales or a Welsh Government defined generic code
Learning Programme Code/activity reference used by provider	
Learning Programme Expected End Date	
Learning programme identifier	
Learning Reference used by provider	
Length of employment with same employer	
Level of highest qualification achieved prior to learning programme	
Learning Difficulty or Disability indicator	
Major source of fees	
Method of delivery	Records whether learning is delivered in classrooms, in the workplace or in other ways
Postcode (at start of learning programme)	
Programme Start Date	
Proportion of learning activity delivered through the medium of Welsh	
Provider delivering learning	
Reason for termination of learning programme	
Result and date of result	
Sector framework codes	
Size of employer/Small to Medium Enterprise (SME) code	
State aid	
Subcontractor delivering programme	
Subject of learning/title of award/learning activity	
Total fees paid for learning programme	
Type of highest Welsh qualification achieved prior to learning programme	
Type of learning programme/activity/award	
Type of Welsh medium learning	
Unitary authority code	
Wage contribution	
Wage rate	
Wage subsidy ID	
Welsh speaker indicator	
Work or centre based guided contact hours	Records how much time the learner is likely to spend learning at an employer or at a college or other learning centre