

MCR Pathways

Young Person Privacy Notice

Who we are

MCR PATHWAYS is a Scottish Charity with the charity number SC045816. Our main address is at 25 Park Circus, Glasgow. Throughout this document, when referring to MCR Pathways, we may call ourselves **MCR, we** or **us**.

What is the purpose of this privacy notice?

We have produced this privacy policy to explain how we will use any information in which you, as a young person involved in the Young Scottish Talent (YST) Programme (either current or former young people), can be identified.

You should read and retain a copy of this privacy notice, so that you are aware of what we are doing with your data and what your rights are.

We are committed to protecting the privacy and security of the information you provide to us, as is required of us by law. This privacy notice relates specifically to data relating to you which we collect in connection with your involvement in our YST Programme by MCR Pathways. We are the 'Controller' of your personal data under UK data protection law, meaning that we make decisions about collecting it and what to do with it.

If you have any questions about this policy or if you do not understand anything which is included in this privacy notice, please do not hesitate to get in touch with us. You can contact us by using the privacy@mcrpathways.org email address.

The kind of information we hold about you.

Personal information means any information which can identify you.

We may collect, store and use the following categories of personal information about you: name, title, addresses, telephone numbers and personal email addresses, date of birth, emergency contact information, photographs and images, additional support needs, free school meal entitlement, your school, educational attainment, and school's location.

We may also collect, store and use the following more sensitive types of information: information about your race or ethnicity, sexual orientation, information about your health, including any medical condition.

How is your personal information collected?

We collect your personal information either directly from you or, sometimes, from your parent/guardian or your school representative. We may sometimes also need to collect personal information about you from the local council in which your school is based.

We will collect additional personal information in the course of your mentoring experience or other MCR-related activities you may be involved in where required.

What is our lawful basis for processing?

We collect your information to support us in delivering the YST Programme to you. Under UK data protection law, we need to have identified a lawful basis for processing personal data, before we start doing so. Most commonly, we will use your personal information in the following circumstances:

1. to comply with a legal obligation;
2. in situations where you have provided consent; or
3. for legitimate interests pursued by us or a third party, provided your interests and fundamental rights do not override those interests.

Some of our legitimate interests include: registering you on the YST Programme, matching you with the most suitable mentor, recruitment and pairing, arranging meetings with mentors, organisation and distribution of work, arranging educational and vocational activities, promoting equality and diversity, and ensuring health and safety.

How we will use your personal information

The situations in which we may process your data are as follows (as required): making decisions about your mentorship, administering our programmes, business management and planning, making arrangements regarding your involvement in the mentorship programme (including where you decide to join or leave the mentorship programme), educational requirements, dealing with legal disputes involving you, and/or complying with health and safety obligations.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We will not use your data for any unrelated purposes without your knowledge or consent or where this is required or permitted by law.

How we use particularly sensitive personal information.

Sensitive personal information needs more protection because it is *sensitive*. We have in place an appropriate internal policy document and safeguards apply when we process such data.

We may process sensitive personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with delivering the mentoring programme or other MCR-related activities.

3. Where it is needed in the public interest, such as for equal opportunities monitoring.
4. Where it is necessary to protect you or another person from harm.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Situations in which we may use your sensitive personal information

In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with delivering the YST Programme or related activities.

We may use information about your physical or mental health, or disability status, to: ensure your health and safety, provide appropriate space for your mentoring sessions; and/or if we reasonably believe that you or another person are at risk of harm and the processing is necessary to protect you or them from physical, mental or emotional harm or to protect physical, mental or emotional well-being.

We will use information about your race or national or ethnic origin, religious beliefs where applicable to pair you with a similar mentor (only if requested by you).

Who will have access to my personal information?

We may have to share your data with third parties, including mentors, school coordinators, school staff and local councils in order to deliver the YST Programme to you and pair you with a mentor. Third party service providers may also have access to your personal information if necessary (for example running our online platforms).

We require third parties to respect the security of your data and to treat it in accordance with the law.

We generally try to keep your personal information inside the UK, but there may be occasions where we need to transfer it to outside of the UK. If we do, we will ensure that it is appropriately protected.

Data retention and security

We will not keep any of your personal data for any longer than is needed, and if disposing of any of your personal data (both paper and electronic), we will do so in a secure way.

In some circumstances, we may anonymise your data so that you are no longer identifiable from it. If we do this, we may use that anonymised information without further notice to you.

We have put in place security measures that we consider appropriate in the circumstances to maintain the security of your data.

More information about MCR's retention policy or about the security measures that are in place can be obtained by contacting us at privacy@mcrpathways.org, if required.

Your rights in connection with personal information

When we process your data, you have the following rights:

- To withdraw consent at any time. To do so please contact privacy@mcrpathways.org.
- To lodge a complaint with the Information Commissioner's Office (ICO) – see below for details.
- To request access to your personal data – please contact privacy@mcrpathways.org.
- To data portability (ie. to have your data provided to you for use across different platforms).
- To request rectification or erasure of your data, as far as the legislation permits – please contact privacy@mcrpathways.org and provide details of what data you wish to be rectified or erased.

The ICO is the UK's independent data protection regulator. For more information, you can visit the ICO's website here: <https://ico.org.uk/your-data-matters/>. You can request further information or register a complaint from:

Information Commissioner's Office

Wycliffe House, Water Lane,
Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113
Email: casework@ico.org.uk

The Information Commissioner's Office – Scotland

45 Melville Street, Edinburgh, EH3
7HL
Telephone: 0303 123 1115
Email: Scotland@ico.org.uk