

## **MCR Pathways**

### **Young Person Privacy Notice**

#### **Who we are**

**We are MCR PATHWAYS**, a Scottish Charity with the charity number SC045816, Address Mitchell Library, Berkeley Street. Glasgow, UK G3 7DN. Throughout this document, when referring to MCR Pathways, we may call ourselves **MCR**, **we** or **us**. We are committed to protecting your privacy and keeping your personal information safe. This notice explains what information we collect about you, why we need it, and how we keep it safe.

#### **What is the purpose of this privacy notice?**

This notice explains how we use your information to help you in our mentoring programme. We collect and hold some information so we can provide the best support possible.

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 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 you can contact us by using the [privacy@mcrpathways.org](mailto:privacy@mcrpathways.org) email address or by asking a trusted adult in your school to contact us on your behalf.

#### **What information do we collect about you and why?**

We collect information about you so we can match you with the best mentor, make sure you have the support you need and record and evidence progress and impact your involvement in the programme has had.

Personal information means any information which can identify you.

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

Your name, age, date of birth, emergency contact details and schools attended  
Your contact details - addresses, telephone numbers and email addresses

Information from your parent/carer, school representative or local council to help with your mentoring and identify what support you may need

Such as, additional support needs, free school meal entitlement, your school educational attainment, school's location, post school pathways.

Additional Information we record for monitoring and evaluation, attendance and participation, potential grades, photographs/images

We may also need to collect, store and use the following sensitive information about your health, background or experiences such as race or ethnicity, medical condition, and gender.

## **How we use particularly sensitive personal information.**

Sensitive personal information needs more protection because it is *sensitive*. We have in place safeguards when we process such data. We may process sensitive personal information in the following circumstances:

1. In limited circumstances, with yours and your parents/carers 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 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).

## **How we use your personal information.**

We use your information for these main reasons

- To match you with a mentor
- To run our mentoring programme
- To track impact. We use anonymised information to see how well our programme is working to promote the programme and get funding to help even more young people.

- Educational requirements
- Dealing with any 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.

## **Who has access to my information?**

Your information is kept secure and is only shared with the people who need to see it to help you.

We only share your first name, age and what interests you share with us with your mentor. We do this so your mentor knows who you are and can begin to build a relationship with you.

Staff from MCR Pathways and your school who are involved in the programme also have access to the information they need to support you and run the programme effectively.

If we have to, we might need to share information for legal reasons or to keep you safe.

We may have to share your data with third parties. We take great care to make sure any third parties we work with also respect your privacy and follow 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.

## **What is our lawful basis for processing?**

We collect your information to support us in delivering the MCR 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 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.

## **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](mailto:privacy@mcrpathways.org), if required.

## **Your rights, you are in control of your information. This means you have the right to**

- Ask us what information we have about you
- Ask us to change or correct your information
- Ask us to delete your information ( if the law allows)

**If you have a concern, please talk to your school coordinator. You can also contact us at by emailing us [Privacy@mcrpathways.org](mailto:Privacy@mcrpathways.org)**

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](mailto: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](mailto:Scotland@ico.org.uk)