

# Privacy Policy

## Youth Start Limited

Company Number: 16864238

Registered Office: 370 Osmaston Park Road, Derby, DE24 8FB

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## Effective Date

1 January 2026

## Next Review Date

1 January 2027

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## Introduction and Purpose

Youth Start Limited (referred to as “we”, “us”, “our”, or “Youth Start”) is committed to protecting your privacy and ensuring you have a positive experience on our website and when engaging with our services. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website at [youthstart.co.uk](https://youthstart.co.uk) and when you interact with our recruitment and mentorship services.

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We take our responsibilities as a data controller seriously and have implemented appropriate technical and organisational measures to protect your personal data from unauthorised processing, accidental loss, destruction, or damage.

Please read this Privacy Policy carefully. If you do not agree with our policies and practices, please do not use our services. By accessing our website or engaging with Youth Start services, you acknowledge that you have read and understood this Privacy Policy.

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## Scope

This Privacy Policy applies to:

- Job applicants who submit applications through our website or recruitment process
- Employers and organisations who engage with Youth Start to access our placement and mentorship services
- Visitors to our website [youthstart.co.uk](https://youthstart.co.uk)
- Young people aged 18-24 who participate in our mentorship programme
- Any individual whose personal data we process in connection with our business operations

This policy covers personal data collected through our website, application forms, email communications, telephone conversations, and in-person interactions.

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## What Personal Data We Collect

We collect personal data that you provide directly to us, as well as data that is generated through your interaction with our services and website. The types of personal data we collect include:

### **From Job Applicants:**

We collect your name, contact details (email address and telephone number), residential address, employment history, educational qualifications, references, and any other information you provide in your application. If you are applying for a role that requires background checks, we may also collect information relating to your criminal history through our background check partners. We may also collect information about your support needs, health conditions, or other circumstances you choose to disclose to help us provide appropriate mentorship and workplace support.

### **From Employers:**

We collect your organisation's name, contact details, business address, company registration details, and information about your recruitment requirements. We also collect details about your workplace practices, policies, and compliance measures to ensure alignment with our standards.

### **From Website Visitors:**

We collect information about your visit to our website, including the pages you view, the time you spend on our site, and the links you click. This information is collected through cookies and similar tracking technologies, which are described in more detail in our Cookies Policy.

### **From Mentorship Participants:**

During the 12-week mentorship programme, we collect information about your progress, challenges, achievements, and any support needs that emerge during your employment. This information is collected through mentorship calls, check-ins with employers, and feedback forms.

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## How We Use Your Personal Data

We use the personal data we collect for the following purposes:

### **Recruitment and Placement:**

We use your personal data to process your application, assess your suitability for available roles, conduct background checks where necessary, and communicate with you about your application status. We use this data to match you with appropriate employers and roles based on your skills, experience, and support needs.

### **Mentorship and Support:**

We use your personal data to deliver our 12-week mentorship programme, including scheduling mentorship calls, providing guidance and support, monitoring your progress in your role, and addressing any challenges that arise. We use this information to evaluate the effectiveness of our mentorship approach and to improve our services.

### **Employer Communication:**

We use employer contact details and information about workplace practices to communicate about placements, conduct employer check-ins, monitor compliance with employment standards, and provide feedback on placement outcomes.





### **Legal Compliance:**

We use personal data to comply with legal obligations, including right to work verification, background check requirements, and tax and employment law requirements. We retain certain data to defend against potential legal claims or discrimination complaints.

### **Service Improvement:**

We analyse aggregated and anonymised data to understand the effectiveness of our services, identify trends in youth employment, and improve our mentorship and placement approach. This analysis helps us develop evidence-based case studies and refine our business model.

### **Website Functionality:**

We use technical data (such as IP address, browser type, and pages visited) to maintain and improve our website, diagnose technical problems, and enhance user experience.

### **Marketing and Communications:**

With your consent, we may use your contact details to send you information about our services, updates about the youth employment landscape, and invitations to participate in research or feedback activities. You can opt out of these communications at any time.

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## **Legal Basis for Processing**

We process your personal data on the following legal bases:

### **Contractual Necessity:**

We process your data where it is necessary to enter into or perform a contract with you. This includes processing data to assess your application, conduct background checks, and deliver mentorship services.

### **Legal Obligation:**

We process certain personal data because we are required to do so by law. This includes right to work verification, tax compliance, and retention of data for potential discrimination claims.

### **Legitimate Interests:**

We process your data where it is necessary for our legitimate business interests, provided these interests are not outweighed by your rights and interests. This includes analysing the effectiveness of our services, improving our website, and preventing fraud or misuse of our services.

### **Consent:**

Where we process sensitive personal data (such as information about health, disability, or criminal history), we do so with your explicit consent. You have the right to withdraw consent at any time by contacting us.

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## **Data Sharing and Disclosure**

We do not sell, trade, or rent your personal data to third parties. However, we may share your personal data in the following circumstances:



## **Employers:**

We share relevant information about successful applicants with employers to facilitate placement and ongoing mentorship. This includes your name, contact details, employment history, and any support needs you have disclosed. Employers are required to protect this data in accordance with data protection legislation.

## **Background Check Providers:**

We share necessary information with background check providers to conduct criminal record checks, right to work verification, and other compliance checks. These providers are data processors acting on our instructions.

## **Mentorship Partners:**

If we engage external mentors or volunteer mentors to deliver mentorship services, we share relevant information about mentorship participants to enable them to provide effective support. External mentors are required to sign confidentiality agreements and comply with data protection obligations.

## **Legal and Regulatory Authorities:**

We may disclose personal data where required by law, court order, or regulatory authority. This includes disclosure to HMRC, employment tribunals, or law enforcement agencies.

## **Service Providers:**

We use third-party service providers to support our operations, including our CRM system (ZohoCRM) and backup storage providers. These providers are data processors and are contractually bound to protect your data and use it only for the purposes we specify.

## **Aggregated and Anonymised Data:**

We may share aggregated and anonymised data with research partners, funders, or other organisations to demonstrate the impact of our services and contribute to evidence on youth employment. This data cannot identify you personally.

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## **Data Retention**

We retain personal data for as long as necessary to fulfil the purposes for which it was collected, or as required by law. Specific retention periods are as follows:

### **Unsuccessful Applicants:**

We retain data from unsuccessful applicants for a minimum of six months following the end of the recruitment process. This retention period allows us to defend against potential discrimination claims. After six months, we delete this data securely unless you have consented to remain on our talent pool for future opportunities.

### **Successful Applicants and Mentorship Participants:**

We retain data for successful applicants and mentorship participants for the duration of the mentorship programme plus a minimum of six months after completion. This allows us to monitor outcomes, provide ongoing support if needed, and defend against potential claims. After this period, we retain anonymised outcome data for impact evaluation purposes.





### **Employer Data:**

We retain employer contact details and information about workplace practices for the duration of our relationship with the employer, plus a minimum of six years for tax and employment law compliance purposes.

### **Website Visitor Data:**

We retain website analytics data for a maximum of 26 months. Cookies are retained in accordance with our Cookies Policy.

### **Backup Data:**

We retain backup copies of personal data on password-protected USB memory drives for a maximum of 30 days to enable recovery in the event of data loss or system failure.

If you request deletion of your data and we have no legal obligation to retain it, we will delete your data within 30 days of your request, unless we are required to retain it for legal compliance purposes.

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## **Your Rights**

Under UK GDPR and the Data Protection Act 2018, you have the following rights in relation to your personal data:

### **Right of Access:**

You have the right to request a copy of the personal data we hold about you. We will provide this information within 30 days of your request, free of charge. If your request is manifestly unfounded or excessive, we may charge a reasonable fee or refuse to comply.

### **Right to Rectification:**

If you believe the personal data we hold about you is inaccurate or incomplete, you have the right to request that we correct or complete it. We will make corrections within 30 days of your request.

### **Right to Erasure:**

You have the right to request deletion of your personal data in certain circumstances, such as where the data is no longer necessary for the purposes for which it was collected or where you withdraw consent. However, we may retain data where we have a legal obligation to do so or where retention is necessary to defend against legal claims.

### **Right to Restrict Processing:**

You have the right to request that we restrict the processing of your personal data in certain circumstances, such as where you dispute the accuracy of the data or where you object to processing.

### **Right to Data Portability:**

You have the right to request that we provide your personal data in a structured, commonly used, and machine-readable format, and to transmit this data to another organisation if you wish.



### **Right to Object:**

You have the right to object to processing of your personal data for marketing purposes or where processing is based on our legitimate interests. We will cease processing for these purposes upon receipt of your objection.

### **Right to Lodge a Complaint:**

If you believe we have breached your data protection rights, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). You can do this by visiting [www.ico.org.uk](http://www.ico.org.uk) or calling 0303 123 1113.

To exercise any of these rights, please contact us using the details provided at the end of this policy.

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## **Data Security**

We have implemented appropriate technical and organisational measures to protect your personal data from unauthorised access, alteration, disclosure, or destruction. These measures include:

### **Encryption:**

Personal data stored in our CRM system (ZohoCRM) is encrypted in transit and at rest. Data transmitted between your device and our systems is encrypted using SSL/TLS protocols.

### **Access Controls:**

Access to personal data is restricted to authorised personnel who require access to perform their duties. Staff members are required to maintain confidentiality of personal data and are subject to confidentiality agreements.

### **Password Protection:**

Backup copies of personal data stored on USB memory drives are password-protected and stored in a secure location with restricted access.

### **Regular Reviews:**

We regularly review our data security measures to ensure they remain appropriate and effective. We conduct risk assessments to identify potential vulnerabilities and implement remedial measures where necessary.

### **Data Breach Response:**

In the event of a personal data breach, we will notify affected individuals and the Information Commissioner's Office without undue delay, as required by UK GDPR. We maintain a data breach register and conduct investigations to determine the cause and implement preventive measures.

While we have implemented robust security measures, no system is completely secure. We cannot guarantee absolute security of your personal data. You are responsible for maintaining the confidentiality of any passwords or access credentials you use to access our services.

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## Third-Party Links

Our website may contain links to third-party websites, including social media platforms, job boards, and partner organisations. This Privacy Policy applies only to youthstart.co.uk. We are not responsible for the privacy practices of third-party websites. We encourage you to review the privacy policies of any third-party websites before providing your personal data.

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## Children and Young People

Our services are designed for young people aged 18-24 and employers. We do not intentionally collect personal data from individuals under 18 years of age. If we become aware that we have collected personal data from someone under 18 without parental consent, we will delete that data immediately. If you are under 18 and have provided personal data to us, please contact us immediately using the details provided below.

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## Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. We will notify you of any material changes by posting the updated Privacy Policy on our website and updating the “Effective Date” at the top of this policy. Your continued use of our services following the posting of changes constitutes your acceptance of the updated Privacy Policy.

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## Responsibilities

### **Data Controller:**

Youth Start Limited is the data controller responsible for your personal data. We determine the purposes and means of processing your data and are responsible for ensuring compliance with data protection legislation.

### **Data Protection Officer:**

Queries regarding data protection and this Privacy Policy should be directed to [contact@youthstart.co.uk](mailto:contact@youthstart.co.uk). We will respond to your enquiry within 10 working days.

### **Individuals:**

You are responsible for ensuring that the personal data you provide to us is accurate, complete, and up to date. You should notify us immediately if any of your personal data changes.

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## Relevant Legislation

This Privacy Policy is based on the following legislation:

- UK General Data Protection Regulation (UK GDPR)
  - Data Protection Act 2018
  - Privacy and Electronic Communications Regulations 2003
  - Companies Act 2006
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## Contact Information

If you have any questions about this Privacy Policy, wish to exercise your data protection rights, or have concerns about how we process your personal data, please contact us:

**Youth Start Limited**

Email: [contact@youthstart.co.uk](mailto:contact@youthstart.co.uk)

Telephone: 07470435603

Registered Office: 370 Osmaston Park Road, Derby, DE24 8FB

We will respond to your enquiry within 10 working days. If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk).

