



PRIVACY NOTICE

BREAKING BARRIERS PROGRAMME

In accordance with relevant Data Protection Legislation (including the UK GDPR and the Data Protection Act 2018), ScottishPower, incorporated in Scotland (registered number SC193794) having its registered office at 320 St Vincent Street, Glasgow, G2 5AD, will process personal data as part of its pre-employment programmes. This Privacy Notice specifically relates to the Breaking Barriers Programme and explains how ScottishPower processes personal data relating to individuals (hereinafter referred to as “participants”) who apply for or take part in the Breaking Barriers Programme. Any reference to “we”, “our”, or “us” refers to ScottishPower. References to “you” or “your” refer to a Breaking Barriers Programme participant.

PURPOSE

ScottishPower participates in the Breaking Barriers programme, which is delivered in partnership with the University of Strathclyde and ENABLE Scotland. The programme supports young people with learning disabilities by providing inclusive access to mainstream university learning, a graduation ceremony, and an eight-week work placement.

The purpose of processing personal data is to administer and deliver the Breaking Barriers programme, including assessing eligibility, selecting participants, arranging and supporting work placements, and ensuring participants are appropriately supported throughout the programme.

Programme Application Route:

- Applications and initial assessments for the Breaking Barriers programme are managed by the University of Strathclyde and ENABLE Scotland.
- During the application stage and initial sift, the University of Strathclyde and ENABLE Scotland act as data controllers, carrying out eligibility checks and suitability assessments.
- Only the personal data of applicants who progress beyond the initial sift is shared with ScottishPower’s Early Careers team for further assessment and programme progression.
- From the point at which personal data is shared, ScottishPower acts as an independent data controller and is responsible for all decision making beyond the initial sift. This includes eligibility assessments, interviews, placement decisions, and the ongoing administration and delivery of the Breaking Barriers programme.

WHAT DATA DO WE PROCESS?

Scottish power may process the following participant data:

- Name and contact details
- Date of birth
- Academic records, including National 4/5 or GCSE results
- CV and application materials
- Eligibility information (e.g., programme entry requirements)
- Records of interviews or assessments
- Attendance and progress information from the college
- Training attendance and progress information
- Bank details for allowance payments
- Notes taken by ScottishPower staff during the selection process

Where voluntarily provided, we may also process information relating to:

- Reasonable adjustment needs
- Health information relevant to participation in training

These types of data will only be processed when necessary and in line with applicable safeguards.

LAWFUL BASIS FOR PROCESSING

We process your personal data on the following legal bases:

- **Legitimate Interests**- to assess applications, administer the programme, support training delivery and maintain programme records.
- **Contractual Necessity**- for steps required before issuing programme documentation or processing allowance payments.
- **Legal Obligations** - including safeguarding, reporting duties, and right-to-work checks before placement

HOW WE USE YOUR DATA

ScottishPower processes your personal data for the following purposes:

- Reviewing participant information shared by the relevant college
- Conducting interviews, assessments or further eligibility checks
- Communicating with you about programme outcomes
- Coordinating enrolment with the partner college
- Administering programme activities, attendance and progression
- Supporting your development throughout the programme
- Arranging and issuing the monthly travel allowance
- Preparing and issuing programme related documentation

Your personal data will be processed solely for the administration and delivery of the Breaking Barriers Programme and will not be used for marketing or for any unrelated purposes.

SHARING YOUR DATA

We share personal data only where necessary and always securely. Your data may be shared with:

- ScottishPower Early Careers and Recruitment teams
- Hiring managers or training supervisors involved in programme delivery
- Partner colleges:
 - ✓ Glasgow Clyde College
 - ✓ ENABLE Scotland.
- Approved third-party service providers supporting our recruitment or training activities
- Government agencies or regulators where legally required

We do not share your information with external organisations for marketing.

DATA SECURITY

We implement robust technical and organisational measures to safeguard your personal data against unauthorised access, loss, or misuse. Access is strictly limited to authorised ScottishPower personnel and governed by confidentiality agreements.

DATA RETENTION

- *Unsuccessful participants*: personal data is retained for up to 6 months following the issue of an unsuccessful outcome letter.
- *Successful participants*: data is retained for the duration of the placement and, thereafter, according to our employee records retention schedule.

AUTOMATED DECISION MAKING

No automated decision making or profiling is carried out as part of this processing activity. All decisions involving your personal data are made by ScottishPower staff.

INTERNATIONAL DATA TRANSFERS

Your data will be processed and stored within the UK or European Economic Area (EEA). Where data is transferred outside of these regions, appropriate safeguards will be applied. ScottishPower is part of the Iberdrola Group. All intra-group data transfers are governed by Binding Corporate Rules (BCRs), which reflect European data protection standards. You can access Iberdrola's BCRs at: <https://www.iberdrola.com/privacy-policy>

YOUR RIGHTS

Under Data Protection Legislation, you have the following rights:

Your right of access - you have the right to ask us for copies of your personal information.

Your right to rectification - you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - you have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - you have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - you have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Right to complain – You have the right to raise a concern with us if you believe your personal data has been handled improperly or in a way that does not comply with data protection legislation. To understand how we will manage and respond to your data protection complaint, please refer to our Data Protection Complaints Procedure, available here: [Security UK - Data Protection Complaints](#)

If you wish to submit a complaint, you can do so using our dedicated Data Protection Complaint Form: [Data Protection Complaint Form](#)

How To Contact Us:

You can contact the *People & Organisation Data Protection team* by email:

dataprotection_po@scottishpower.com

You can contact our *Data Protection Officer* by email:

dataprotection_corporate@scottishpower.com, or in writing:

Data Protection Officer
Corporate Security
Scottish Power UK
320 St Vincent Street

Glasgow, G2 5AD

If you remain unsatisfied with our response to your complaint, you have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) by contacting:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF

Or Tel: 0303 123 111

Website: <https://www.ico.org.uk>

Date of Privacy Notice: June 2026