

Steps 2 Success Privacy Notice Annex

Type of Organisation information is shared with	The type of information	What we use your information for	The lawful reason under GDPR that we process your information
<p>Department for Communities (DfC)/ JBO</p>	<ul style="list-style-type: none"> • Full data set, including information such as name, contact details, date of birth NI number, • Information which relates to your health and/or disability (i.e. special category data). • Special category information, such as Gender, Religion, Disability, Ethnicity, Sexual Orientation, Criminal Convictions • Qualifications, job goals, employment history • Marital Status and family circumstances • ID check and right to work • Information collected during your time on the programme, such as correspondence, customer feedback forms, welcome pack declaration, C.V, consent forms, start forms, exit forms etc. 	<p>The Authority responsible for the provision of the Steps to Success employment programme which assists people to find and keep a suitable job.</p>	<p>Art 6(1)(e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p> <p>Art 9 2(h)- Processing is necessary for the processing of preventative medicine, medical diagnosis, the provision of health or social care treatment</p> <p>Art 92(i) - Processing is necessary for reason of public interest in the area of public health</p>
<p>Delivery Partners - Armstrong Works and People 1st</p>	<p>As for DfC</p>	<p>For the delivery of S2S programme in the Northern Ireland area - each end to end delivery partner will only have access to Participant data that they are working with. Only Ingeus has access to all participant info</p>	<p>As above</p>
<p>Her Majesty's Revenue and Customs (HMRC)</p>	<p>Employer information to verify outcomes from the S2S programme. Additionally, we may share information received indicating any fraudulent behaviour</p>	<p>To verify outcomes in relation to step to success contract</p>	<p>Art 6(1)(e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p>

General Practitioners (GP)	As for DfC – relevant data	To provide 'one-off' interventions to Participants on an ad-hoc basis.	Art 6(1)(a) - Consent Art 9(2)(a) - Explicit consent
Employers	Limited personal data - names, CV information, address, DOB	For the purpose of assisting participants to get a job placement. Participant names might be shared with employers when participants move into work. To confirm / verify employment outcomes	Art 6(1)(a) - Consent
Audits - Department for Economy (DEC)	Limited personal data - names, CV information, address, DOB	For the purpose of auditing and evaluating the services on behalf of the DfC. The DEC will also interview programme participants. DEC will also be responsible for completing compliance audits that is primarily based on auditing financial claims - DEC will contact selected programme participants (but consent shall be obtained).	Art6(1)e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Section 13(1)(b)(iv) and 1A of the Social Security (Claims and Information) Regulations 1999 enables DWP to share social security and employment and training information with relevant authorities and their service providers in connection with any arrangements made by the recipient for purposes connected with employment and training.
Probation officers (NPS or Police)	Full data set provided which includes licence conditions	To deliver the Steps to Success Programme to probation Participants. If necessary Ingeus advisor will then contact participants probation officer/police for more details.	Art 6(d) - processing is necessary to protect the rights of another legal person: 6(c) - processing is necessary for compliance with a legal obligation to which the controller is subject 9(2)(b) - processing is necessary for the obligations and rights in the field of employment and social protection

			<p>9(2)(g) processing is necessary in the substantial public interest</p> <p>9(2)(f) - Processing is necessary where the courts are acting in their legal capacity (in order to carry out the court's sentence)</p>
Other Ingeus entities providing IT or management services (Ingeus Europe Limited)	Full data set is accessible to nominated individuals	Nominated Ingeus Europe staff will have access to full data set including Participant data and staff data to provide IT and/or management support	As for DfC
Gateway Teams/Safeguarding Authorities	Limited personal data set provided for the purposes of reporting an incident.	Reporting incidents or issues arising from participants on the programme as required by law.	<p>Art 6(1)(c) - processing is necessary to comply with a legal obligation to which the controller is subject</p> <p>Art 9(2)(g) - processing is necessary, on the basis of Member State law to safeguard the fundamental rights and the interests of the data subject.</p>
Insurers	Data required to describe to nature of the claim. This may be quite detailed depending on the allegation made / being defended/prosecuted.	It is possible that participants or third parties may bring claims or suffer incidents while participating on the programme. We are required to disclose any such incidents to our insurers.	<p>Art 6(1)(f) - processing is necessary to protect the legitimate interests of the data controller</p> <p>Art 9(2)(f) - processing is necessary for the establishment and defence of legal claims</p>