



## Privacy Notice - Participant

### Protecting Your Personal Information: Your Rights, Our Responsibilities

AKG Employment are committed to being transparent and open about the data we process. This Privacy Notice explains what we do with your personal information that we collect, why we need it, who we share it with and how long we keep it for. An up to date version of this Privacy Notice is available on our website.

Your personal information is the information that identifies you - like your name, address and other contact details. We receive this, and other information, from Job Centre Plus when you are referred to us for the Restart Scheme, which is a mandatory employment programme for eligible participants. We will collect more information from you and Job Centre Plus whilst we are supporting you into employment.

AKG Employment will ensure that your privacy is protected and that your information is safe. In order to stop unauthorised access or sharing we have put in place physical, electronic and compliance procedures to safeguard and secure the information we collect from you, including your online details.

### Our reasons and legal basis for processing your information

We operate under contract with the Department for Work & Pensions (DWP). We collect information from the DWP and from you to allow us to carry out our work delivering training and support face-to-face within our Centres, over the telephone or by virtual meetings e.g. on Teams, and in community sites. We need this information to deliver our service to you and for the DWP to check that we are providing you with a good service and to make the right payments to us for delivering our services.

We work collaboratively with AKG entities, delivery partners, employers and other support and training organisations to improve skills and secure employment opportunities and to ensure intensive specialist support is provided to those who need it.

AKG Employment and the DWP are Joint Data Controllers for your personal data, including special categories of personal data, such as health information.

In practical terms, the joint controller arrangement applies to the core programme processing necessary for referral, engagement, support delivery, outcomes tracking and DWP assurance/payment activity, i.e., the processing needed to deliver the service and to enable DWP oversight and contractual assurance.

We may also act as an Independent Data Controller for some personal data which may not be jointly shared with the DWP. This is where processing is required for AKG's own separate purposes/obligations and is not jointly shared with the DWP, for example, where we process personal data to meet our own legal obligations, such as health and safety, safeguarding, complaints handling, information security, or audit requirements.

For the Restart Scheme, both AKG Employment and the DWP process personal data in the exercise of official authority and to perform a specific task in the public interest.

For special category data we process the data necessary for the purposes of carrying out the obligations and exercising specific rights of the controller, or of you the individual, in the field of employment and social security and social protection law.



We do not rely on consent as a legal basis for processing in delivering the Restart Scheme and as such we do not seek your consent when you start on the scheme. You will be asked to sign an Induction Pack to confirm that you received the booklet, that you have read and understood the section on how your information is used, and that you are aware of the arrangements for expenses and HMRC declarations. It is not a request for consent to process your data.

### Why do we collect personal information about you?

AKG Employment deliver the Restart Scheme and some of the key stages of the scheme are:

- Completion of a diagnostic assessment which helps identify your strengths, skills and any employment barriers. Through completion of this assessment, you may identify barriers such as health conditions or disabilities, housing issues, personal debt or other concerns.
- Completion of a demographic questionnaire which helps us tailor our support to you and informs our ongoing improvements to service delivery.
- Completion of action plans which will detail the agreed activities you need to undertake.
- Ongoing contact, including meetings in person and personalised support tailored to meet your needs to help you into work.
- We will work with employers, local employer bodies and community partners to deliver appropriate high quality, individualised employment support and training and to identify suitable vacancies and work opportunities.
- Working with you to support you obtaining employment or self-employment during your time on the Restart Scheme which will include finding job vacancies, helping with job applications and CVs and ongoing support/advice.
- Ensuring you are made aware of the possible impact on any benefits you receive, before starting any paid employment or self-employment.
- Once in employment, or self-employment, we will continue to offer support to help you sustain employment.
- We may maintain contact for a period of 6 months following your exit from Restart to track and monitor your progress or any change in circumstances. We may also want to tell you about any new support we can offer.

### What sort of information do we receive and ask for?

We receive some information about you from the JCP Work Coach when you are referred to the Restart Scheme. More information is provided via a DWP IT system which a limited number of AKG staff access. These details may include:

- Name
- National Insurance number
- Email address
- Telephone number
- Address
- Any easements to work searching or availability
- The steps already taken by you on your journey towards employment
- Details of any special requirements due to a disability, mental or physical condition if relevant
- Any communication needs, complex needs or vulnerabilities
- Advanced support concerns or additional needs
- Any safeguarding requirements
- Whether you require any childcare support during your time on programme
- Whether you fall into a specific group such as an ex-offender, misuser of drugs, misuser of alcohol



When you have your first call with us, we will check and verify some of the above details to ensure they are correct. We will contact you throughout your time on Restart and this may be by letter, email, text or phone call, depending on the type of communication we need to send, but this will usually be by email and text. When we first meet you in person, we will check your ID, such as a passport, driving licence, or utility bill. We will record that the ID check has happened, but copies will not be kept.

Whilst you are on programme, we will collect more information from you so that we can provide the best support and make sure we are able to provide the DWP with the information they require. We will record details of conversations and interactions with you. We use Beam Notes (formerly Magic Notes) powered by Beam, a secure AI-powered tool. This helps us create clear and accurate notes which will assist in improving the quality of the support we can offer. Before recording our conversations, we will make sure you are happy for us to record and ask for your consent. If you do not agree to the recording, we will capture the same information by taking notes manually.

We may also use Interpret (Real Time Translation) which is hosted in the Beams Notes website. Interpret is used to increase access to support for participants for whom English is not their first language and improve outcomes. Interpret translates conversations in real time, but there is an option to transcribe that conversation in Beam Notes if required.

The recording within the Beam Notes system is stored in the UK and is retained for 60 days before it is automatically deleted. The transcription of the recording is reviewed and amended where relevant and uploaded to your case record.

Below is some of the information we may collect, but we may collect other information depending on your circumstances.

- Your qualifications
- A basic skills assessment
- Information about jobs you have had in the past
- What kind of job you are looking for / the hours you would prefer to work
- Driving Licence Endorsements (points)
- Any agreed restrictions such as a restriction to where you can work, e.g. if you were excluded from being able to enter a specific area due to Probation or Bail conditions etc.
- Your Mandatory Work-Related Activity which will have been set by your JCP work coach
- Your Signing Day, Claim Cycle, Universal Credit Assessment Period
- Your referral date
- Any incident markers you may have on your JCP record
- Your childcare needs
- Barriers which are making it more difficult for you to find work
- Any additional support or reasonable adjustments needed/made for you
- A hospital admission and/or discharge
- Details of an Appointee or someone who has Power of Attorney
- Your caring responsibilities
- Changes that may affect you being able to attend appointments etc (e.g., Jury service, civic duties, domestic emergency, easements for domestic abuse or violence)
- Imprisonment or prison release
- Details of any part-time education you are completing
- Any period of sickness
- Restrictions (e.g. attendance)



- Start or end dates of work (including part-time, voluntary or self-employment)
- The outcome of Self-Employment Gateway Interview and quarterly interviews (if appropriate)
- Your first reported earnings date after moving into employment and achievement of required earnings
- End date of a job you got whilst still on the Restart Scheme
- When your earnings reach/go over the Employed Outcome payment threshold earnings level
- Any change of circumstances, for example if you move house, or get married
- A Better Off Calculation which asks for information about you, any dependants, any household non-dependents and income

You may also choose to share other information with us in relation to your personal and domestic situation or family circumstances or any other information that could affect your ability to secure sustained employment or attend appointments. You may also want to provide us with contact details for your next of kin or family member or someone who may act as a carer, translator or support for you.

We may ask for your bank details if we need to reimburse you for travel or other expenses. Please note that the DWP/Jobcentre Plus will never ask you for your bank details during or after your participation on the Restart Scheme.

You may agree to take part in some activities that require a basic or enhanced check with the Disclosure & Barring Service (DBS) who perform criminal record checks and you may need to share other information needed to complete this check.

All this information is stored securely in DWP and AKG IT systems. Your record of participation on the Restart Scheme is held within our case management system, PICS, provided by Advanced Computer Software Group. The system is cloud hosted in Microsoft Azure utilising data centres within the UK. No data is transferred outside the UK.

Some information may also be in paper copy, such as your Action Plan which is given to you to keep.

### What do we use the information for?

Some of the information we ask for is a contractual requirement with the DWP. This, and other information collected or given to us by you, will help us support you into sustained employment and ensure we offer you a personal and tailored service, which will take account of any support concerns or needs, or any restrictions to your work search or availability.

We will use your contact details to send you Participant Surveys. Your feedback is valuable to us to help ensure we continually improve our services.

We may want to publish Good News Stories about people on programme. These stories may be published on social media or via other external and internal methods. If we would like to use your information in one of these publications, we will ensure we get your agreement and written consent, but you do not have to agree to this.

### Who do we share your information with?

We will share your information with the DWP, Jobcentre Plus, our partners and other organisations who provide support and specialist services such as CV preparation, skills assessments, mentoring, counselling, translation services or training courses.



Some training providers deliver courses with funding eligibility and to make the referral and enrol on the course, additional information may be required, such as whether you were born in the UK, or when you entered the UK.

If you advise us that you have health and wellbeing concerns, we can refer you to AKG Health who offer specialist health advice, support and interventions. If you agree to be referred, we will seek your agreement to make that referral and allow AKG Health to collect information about you and your health. This information is held securely in our case management system.

Where possible we will signpost you or ask you to self-refer to other organisations that we think may be able to help you with any identified support needs. There are some organisations we partner with and we will refer you to them directly. These referrals will be discussed with you prior to any referral or information being shared. Where possible we will use a unique ID number and/or surname but we may have to provide other details, such as your full name and contact details and other relevant information such as any support needs, health or disability. We may also receive feedback from those partner organisations on your progress, attendance or additional identified support needs.

Where necessary, appropriate agreements will be in place with those partner organisations and other suppliers supporting the delivery of our services detailing their obligations in relation to your personal information.

To support your employment search, we will help with your CV and job applications and tell you about job opportunities with local employers we are working with and we may share your details and CV with those employers.

The DWP, AKG and other providers of the Restart Scheme contractually partner with organisations who may undertake research studies and conduct surveys with participants who have been referred to the Restart Scheme to drive improvements to this programme and future programmes. In order to undertake surveys, participant contact details may be provided to the researchers.

The organisations and people we regularly share information with are:

- DWP
- Your Jobcentre Plus Work Coach, this may be a copy of your Action Plan, your progress on the Restart Scheme, or other information that they may request from us, or we need to tell them about.
- AKG entities and contracted partners - your information may be shared with our group entities and partner organisations, or other organisations that offer services that we do not deliver directly, such as self-employment support. In order to share this information, we have contracts in place with those organisations, which state how your personal information is to be protected.
- Subcontracted Delivery Partners - your information may be shared with a subcontracted delivery partner where they have identified a job vacancy which you may be suitable for. In this circumstance your information would be shared so that they can support you through the application process. We would always speak to you before sharing this information. Subcontracted Delivery Partners are organisations that we have contracted to deliver the Restart Scheme on our behalf.
- Support organisations including those that offer specialist mentoring and support, e.g. counselling.
- Support and training organisations that can help improve your skills, such as Forklift Truck Training, achieving a CSCS Card, Customer Service etc.
- Employers and Recruitment Agencies.



If you have an Appointee who is legally empowered to act on your behalf, we will share information with them and we do not need to ask your permission to disclose information to them.

If you have a Representative, the DWP will tell us, and we will get your written agreement before sharing any of your information with them.

There may be times when we are legally required to share information with statutory agencies such as the Police, Local Authorities, Courts or HMRC. This may be in relation to employment statistics, safeguarding risks, criminal or civil proceedings or fraud. Information can be shared without your knowledge in these circumstances.

There may be other times when we are requested to provide information we hold on you by third parties not related to the delivery of our services, and where required, we will seek your explicit agreement before providing any information.

If we were to sell or transfer our business or part of our business this may involve the transfer of our operations and/or records to another organisation(s). As part of the sale or transfer, your personal data may be transferred to the new organisation(s) who will, under the terms of this Privacy Notice, be permitted to use this data for the purposes for which it was collected i.e. to deliver the Restart Scheme, or other employment related programme.

We do not share or store your information with bodies outside of the UK and EU.

### How long do we keep your information?

We will keep your information for 12 months following the end of all Restart service delivery due to expiry or termination of the delivery contract.

There may be other information, such as details relating to expenses or financial details that are required by HMRC. This information will be retained for the duration of the contract plus 7 years.

### Your Rights and how to get a copy of the information we hold on you

You have rights under the law including the right to see the information we have relating to you, to ask us for a copy of it, to have it changed if it's not right, or out of date, or to have it deleted. There will be times when we can't delete all of your information because our contract with the DWP requires us to keep certain parts of your record for audit purposes.

No payment is required for a copy of your information and we will provide it to you within one month of you asking for it. To get a copy of your information contact the Data Protection Officer by email at [DPO@akguk.co.uk](mailto:DPO@akguk.co.uk). You may need to provide your full name and date of birth and current address. Additional identification may also be required such as a driving licence, passport or Birth Certificate.

### What if you are unhappy about the information we keep about you?

If you aren't happy about how we are looking after your information, then you should talk to us about it. You can contact the Data Protection Officer for at [DPO@akguk.co.uk](mailto:DPO@akguk.co.uk). After talking to us, if you are still not happy you can contact the Information Commissioner's Office who can be contacted at:



Information Commissioner's Office  
Whycliffe House, Water Lane  
Wilmslow, Cheshire. SK9 5AF  
Telephone 0303 123 1113

Further information about the work of the Information Commissioner and about data protection can be found at [www.ico.org.uk](http://www.ico.org.uk)

### Website Access and Usage

Our website uses cookies - a cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Declining cookies may prevent you from taking full advantage of the website.

This Privacy Notice may periodically be updated. Updated versions will be published on our website. This Notice was last updated on 22/05/2026.