

# Summer Jobs Programme Project Privacy Notice

## Introduction

The Summer Jobs Programme aims to offer young people aged 16-20 who are at risk of violence a paid job during the 6 weeks' summer holidays. UK Youth is delivering The Summer Jobs programme.

This programme is principally funded by the Youth Endowment Fund (YEF) and co-funded by the Youth Futures Foundation (YFF). The programme successfully ran as a feasibility study in 2024, allowing it to progress to a Pilot study and a Randomised Control Trial (RCT) in 2025, and now an Efficacy Study in 2026. This is being evaluated by IFF Research. It is further assisted by local delivery partners based in selected London boroughs, Greater Manchester, West Midlands, Yorkshire and the Humber, the North East of England and South Wales. This privacy notice sets out how we collect and use the personal data of young people ('participants'), youth workers, and employers for the purposes of the programme.

This privacy notice needs to be read in conjunction with the UK Youth general privacy notice that can be found [here](#). A separate privacy notice, as part of the baseline survey, provides information about how IFF Research will use data.

## Contact details

UK Youth and IFF Research are joint data controllers and are responsible for your personal data collected in connection with this programme.

This notice applies to the personal data we collect directly from you and personal data provided to us by third parties. Where we collect personal data from you directly, please ensure that any personal details you provide are accurate and up to date, and let us know about any changes as soon as possible.

Each organisation has appointed a contact who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights in relation to your personal data, please use the contact details below:

### UK Youth

Post: Data Protection Officer, c/o UK Youth, Avon Tyrrell Outdoor Centre,  
Bransgore, Hampshire, BH23 8E

Email: [dataprotection@ukyouth.org](mailto:dataprotection@ukyouth.org)

### IFF Research Ltd

Post: IFF Research, 5<sup>th</sup> Floor, the Harlequin Building, 65 Southwark Street, London, SE1  
0HR

Email: [summerjobs@iffresearch.com](mailto:summerjobs@iffresearch.com)

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## What personal data will we collect?

## Data subjects

The personal data transferred concern the following categories of data subjects:

1. Young people
2. Placement Providers or Employers
3. Youth workers
4. Local delivery partner managers
5. Referrers

## Purposes of the transfer(s)

The transfer is made for the following purpose:

The Permitted Purposes.

## Categories of data

The personal data transferred concern the following categories of data:

### REFERRAL FORM

- Young People:
  - o Full Name
  - o Who is completing this form?
  - o Preferred Pronouns (may indicate gender identity)
  - o What is your preferred name
  - o Date of Birth
  - o Gender [Special Category Data – if sharing gender identity different from sex at birth]
  - o Ethnicity [Special Category Data – racial or ethnic origin]
  - o Email Address
  - o Phone Number
  - o If they are still in school
  - o If they have participated in programmes or services with one of the Summer Jobs 2026 Local Delivery Partners in the last 6 months
  - o Age of YP
  - o YP's right to work in the UK
  - o If YP is employed for more than 15 hours per week
  - o If YP is studying towards a degree at the moment
  - o YP's level of spoken English
  - o If the YP is currently facing a charge for a serious offence [Criminal Offence Data – Article 10]
  - o What offence the YP is being charged with [Criminal Offence Data – Article 10]
  - o If the YP will be living on a secure estate in July 2026 (e.g. YOI, STC, SCH) [Criminal Offence Data – may share custodial status]
  - o Which area the YP will be living in during the programme (July–September 2026)

- o Which area of South Wales, Greater Manchester, North East, West Midlands or Greater London the YP lives in
- o If the YP is being supported by or attending services run by a youth organisation delivering the Summer Jobs Programme in their area
- o Whether the YP is or has been in contact with Youth Offending Teams [Criminal Offence Data]
- o Whether the YP has been arrested and released with no further action [Criminal Offence Data]
- o Whether the YP has previously lived on a secure estate (historic) [Criminal Offence Data – may share custodial status]
- o YP identified at risk of criminal exploitation [Special Category Data – safeguarding / risk]
- o YP has sibling or parent involved in serious violence [Special Category Data – safeguarding / family risk]
- o YP attending or attended alternative provision [Special Category Data – education / disability context]
- o Whether YP has at least two fixed-term exclusions [Special Category Data – education / disability context]
- o YP permanently excluded from school [Special Category Data – education / disability context]
- o YP persistently absent from school [Special Category Data – education / disability context]
- o YP is, or has been in care [Special Category Data – health / social care]
- o YP has, or has had, a social worker [Special Category Data – health / social care]
- o YP has been a victim of violence [Special Category Data – health / safeguarding]
- Referrers:
  - o Referrer's Full Name
  - o Referrer's Contact Number
  - o Referrer's Email Address
  - o Referrer's Organisation Name & Type
  - o If the YP is known to the referrer or referrer's organisation
  - o Referrer's relationship to the YP
  - o Check on YP's knowledge of the Summer Jobs programme
  - o Consent to being contacted about the outcome of the YP's allocation into the Summer Jobs programme

## REGISTRATION FORM

- Young people:
  - o Full Name
  - o Date of Registration
  - o Confirmation that the YP has received programme information and had the opportunity to review materials and ask questions

- o Confirmation that the YP has consented (within the baseline survey) to participation in the programme and the Randomised Control Trial study
- o Unique Registration Code (entered at completion of registration)
- o Current Address Line 1
- o Current Address Line 2
- o Current Address Line 3
- o Town/City
- o Postcode
- o Secondary Email Address (e.g. parent or guardian, where relevant)
- o Preferred Communication Channel
- o Emergency Contact Name
- o Relationship to YP
- o Emergency Contact Phone Number
- o Emergency Contact Email
- o National Insurance Number (NINO)
- o Biological Sex
- o Whether the YP's gender is the same as the sex registered at birth [Special Category Data – gender reassignment indicator]
- o Nationality
- o Eligibility for Free School Meals (current or previous)
- o Whether the YP has Special Educational Needs and Disabilities (SEND) [Special Category Data – health/disability]
- o Level of proficiency in spoken English
- o Whether the YP has any allergies or dietary requirements [Special Category Data – health]
- o Details of allergies or dietary requirements [Special Category Data – health]
- o Whether the YP has any health conditions the employer may need to be aware of [Special Category Data – health]
- o Details of health conditions [Special Category Data – health]
- o Whether the YP has any additional needs they would like the employer to be aware of [Special Category Data – health/disability]
- o Details of additional needs and any reasonable adjustments required [Special Category Data – health/disability]
- o Whether participating in the programme presents a risk to the YP's wellbeing [Special Category Data – health/safeguarding]
- o Employment preferences and expectations
- o Industries or careers of interest
- o Type of Right to Work document the YP can provide
- o RTW (Right to Work) Check status
- o RTW Notes
- o DBS original documents available (tick all that apply)
- o DBS check status
- o DBS Notes
- o Placement
- o Placement Provider

- o Workplace Supervisor
- o Bank Account Name
- o Bank Account Number
- o Bank Account Sort Code
- o Starter Declaration (payroll setup declaration)
- o Randomisation Outcome

## PARTICIPANT RECORD

- Young People:
  - o Full name
  - o Meeting details: purpose, date, outcomes
  - o If YP has been introduced to employer and date of introduction
  - o Attendance details for modules / total hours completed
  - o If DP had celebration event
  - o If YP attended celebration event
  - o YP drop-out
  - o YP reason for drop-out [Special Category Data – may indicate wellbeing or safeguarding issues]
  - o If YP placed in organisation they are already known to
  - o If young person is in a placement with another young person completing the Summer Jobs programme
  - o If YP has scheduled annual leave, and dates of annual leave
  - o Days YP attended per week
  - o If placement was of interest to YP and reason
  - o Check-in details: date, in person or not, duration, notes [Special Category Data – may include wellbeing, health, or safeguarding information]
  - o Access Fund spent by YP
  - o Access Fund spend details [Special Category Data – may include disability or financial support information]
  - o Support offered to YP following their participation in Summer Jobs 2026? [Special Category Data – may include wellbeing, health, or safeguarding information]

## EMPLOYMENT PASSPORT (YP)

- Young People
  - o Full name
  - o Any past work experience details for YP
  - o Environment that YP likes to work in
  - o Support that YP finds useful when they face challenges and what others can do to support them [Special Category Data – may include wellbeing, health, or disability information]
  - o How the YP likes to receive feedback

- o Youth Worker observations / experience of working with the young person [Special Category Data – may include wellbeing, health, or disability information]
- o Consent for sharing information with wider team
- o YP allergies or dietary requirements [Special Category Data – health]
- o YP health conditions and reasonable adjustments required [Special Category Data – health]
- o YP additional needs relevant to employer or placement [Special Category Data – health / disability / wellbeing]
- o YP any additional needs not covered above [Special Category Data – health / disability / wellbeing]
- o YP any other adjustments required [Special Category Data – health / disability / wellbeing]

## WORKPLACE RECORD (EMPLOYER)

- Placement Providers or Employers
  - o Employer Name, Job Title, Email, Contact Phone, Contact Role
  - o Supervisor Name, Job Title, Email, Contact Phone, Contact Role
  - o Employer Placement Details
  - o Number of placements with same job title and address
  - o Placement Address
  - o Skills and Knowledge required for the role
  - o Skills and Knowledge gained in the role
  - o Shift Pattern
  - o If placement involves hybrid working arrangements
  - o If placement requires DBS check [Criminal Offence Data – Article 10]
  - o Reason why DBS is needed [Criminal Offence Data – Article 10]
  - o Buddy Name, Role, Phone, Email
  - o Employer safeguarding policy
  - o Employer policies in place to protect young people and copies provided to UK Youth
  - o Employer compliance confirmation / NSPCC safeguarding training notes
  - o Any lone working with the young person and just one other member of staff?
  - o Staff member name to be DBS checked
  - o Staff member email to be DBS checked
  - o Link to Employer Risk Assessment
  - o Prep week details: notes, date, duration, topic
  - o Check-in details: notes, date, duration, topic [Special Category Data – may include wellbeing or safeguarding information]
- Young People:
  - o Job Category
  - o Job Title
  - o Job Description
  - o Specific equipment young person will need

- o Uniform or dress code requirements for YP
- o If uniform size of YP is required
- o If YP T-shirt size is required
- o If YP trouser size is required
- o If YP was matched with a buddy
- o Description of support offered by the buddy [Special Category Data – may include wellbeing or safeguarding information]
- o Feedback on young person [Special Category Data – may include wellbeing or safeguarding information]
- o Mock interview date and time
- o Interview feedback [Special Category Data – may include wellbeing or safeguarding information]
- o Letter of Recommendation [Special Category Data – may include wellbeing or safeguarding information]
- o If YP has been offered ongoing employment with employer

#### YOUTH WORKER DATA

- Name and contact details

#### REFERRER DATA

- Name and contact details

#### LOCAL DELIVERY PARTNERS

- Name of organisation
- Email address

#### Special Category Data

The personal data transferred concern the following categories of special category data:

- Gender [if sharing gender identity different from sex at birth]
- Ethnicity [racial or ethnic origin]
- YP identified at risk of criminal exploitation [safeguarding / risk]
- YP has sibling or parent involved in serious violence [safeguarding / family risk]
- YP attending or attended alternative provision [education / disability context]
- Whether YP has at least two fixed-term exclusions [education / disability context]
- YP permanently excluded from school [education / disability context]
- YP persistently absent from school [education / disability context]
- YP is, or has been in care [health / social care]
- YP has, or has had, a social worker [health / social care]
- YP has been a victim of violence [health / safeguarding]
- Whether the YP's gender is the same as the sex registered at birth [gender]

- reassignment indicator]
- Whether the YP has Special Educational Needs and Disabilities (SEND) [health /disability]
- Whether the YP has any allergies or dietary requirements [health]
- Details of allergies or dietary requirements [health]
- Whether the YP has any health conditions the employer may need to be aware of [health]
- Details of health conditions [health]
- Whether the YP has any additional needs they would like the employer to be aware of [health / disability]
- Details of additional needs and any reasonable adjustments required [health / disability]
- Whether participating in the programme presents a risk to the YP's wellbeing [health / safeguarding]
- YP reason for drop-out [may indicate wellbeing or safeguarding issues]
- Check-in details: notes [may include wellbeing, health, or safeguarding information]
- Access Fund spend details [may include disability or financial support information]
- Support offered to YP following participation [may include wellbeing, health, or safeguarding information]
- Support that YP finds useful when facing challenges [may include wellbeing, health, or disability information]
- Youth Worker observations / experience of working with YP [may include wellbeing, health, or disability information]
- YP allergies or dietary requirements [health]
- YP health conditions and reasonable adjustments required [health]
- YP additional needs relevant to employer or placement [health / disability / wellbeing]
- YP any additional needs not covered above [health / disability / wellbeing]
- YP any other adjustments required [health / disability / wellbeing]
- Check-in details in Workplace Record: notes [may include wellbeing or safeguarding information]
- Description of support offered by buddy [may include wellbeing or safeguarding information]
- Feedback on young person [may include wellbeing or safeguarding information]
- Interview feedback [may include wellbeing or safeguarding information]
- Letter of Recommendation [may include wellbeing or safeguarding information]

## Criminal Offence Data

The personal data transferred concern the following categories of criminal offence data:

- If the YP is currently facing a charge for a serious offence [Article 10]
- What offence the YP is being charged with [Article 10]
- If the YP will be living on a secure estate in July 2026 (e.g. YOI, STC, SCH) [may share custodial status]
- Whether the YP is or has been in contact with Youth Offending Teams [Article 10]

- Whether the YP has been arrested and released with no further action [Article 10]
- Whether the YP has previously lived on a secure estate (historic) [may share custodial status]
- DBS check required for placement [Article 10]
- Reason DBS check is required [Article 10]
- Staff member name to be DBS checked [Article 10]

\*Some of this data – ethnicity and data about health conditions – constitutes ‘special category data’ under data protection laws, and additional protections will apply to our collection and use of this data. This information is vital for our analysis, to assess the reach and possible differential effects of the programme. Reporting on these fields for the purpose of our research will be in an aggregated format only.

### What do we do with information we collect?

UK Youth is collecting your personal data to facilitate the delivery of The Summer Jobs Programme and the Pilot study. Processing your personal data is necessary to:

- Deliver the Summer Jobs programme
- Understand the efficacy and impact of the Summer Jobs programme through testing randomisation and collection of outcome data.

We need to gather contact details to enable effective participation in the programme, including matching to specific delivery partners, employment matching and access to employment placements, right to work checks and payroll processing. This data will enable the scheduling of interviews to explore experiences within the programme, and their subsequent evaluation.

The processing of special category data such as young people’s ethnicity, reasonable adjustments, and Special Educational Needs (SEN) status is necessary to establish whether there are differential rates of dropout from the programme for participants from different groups and to assess whether outcomes vary by these characteristics.

The processing of criminal offence data is to enable eligibility assessment for the programme.

### What is our lawful basis for processing your personal data?

Data protection laws require us to meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a lawful basis for the processing. Given the nature of The Summer Jobs programme, some data that we require is essential for participation in the programme and we will inform you at the time of gathering the data when that is the case.

#### For all information collected:

UK Youth is relying on the lawful basis of:

**LEGITIMATE INTERESTS:** Our lawful basis for processing the personal data listed above is legitimate interests (as per Article 6 (1) (f) of the GDPR 2018) and we have considered that participants’ interests and fundamental rights do not override those legitimate interests).

It is necessary and in UK Youth’s legitimate interests to process the personal data identified above to deliver The Summer Jobs programme and to facilitate a feasibility assessment of The Summer Jobs programme that has been commissioned by the YEF.

The programme fulfils UK Youth's core business aims of unlocking youth work for all young people through the delivery of innovative youth development programmes and building evidence about the difference that youth work makes.

**For special category data:**

**SCIENTIFIC RESEARCH PURPOSES:** Our processing is necessary for scientific research purposes in the public interest, subject to suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, as required by applicable laws.

**For Criminal offence data:**

**RESEARCH PURPOSES:** Our processing is necessary for scientific research purposes in the public interest, subject to suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, as required by applicable laws.

**Who has access to your information?**

Your information will be accessed by a limited number of staff at UK Youth working on this programme.

Your information will be shared on a need-to-know basis with identified local Delivery Partners to enable effective participation in the programme.

Your information will be shared with IFF Research's project team working on this programme. Certain limited information (not criminal offence data) will be shared with relevant employment placements agreed with you as part of the programme.

Certain limited information (not special category data or criminal offence data) will be shared with Tempo to facilitate right to work checks and payroll processing for the programme.

UK Youth may disclose your information to third parties in connection with the purposes of processing your personal data set out in this notice. These third parties may include:

- regulators, law enforcement bodies and the courts, in order to comply with applicable laws and regulations, assist with regulatory enquiries, and cooperate with court mandated processes, including the conduct of litigation;
- suppliers, research assistants and sub-contractors who may process information on behalf of UK Youth [e.g. cloud services to store data, survey providers to deliver surveys, and transcription services to provide transcripts of interview data]. These third parties are known as data processors and when we use them we have contractual terms and policies and procedures in place to ensure that your personal data is protected. This does not always mean that they will have access to information that will directly identify you as we will share anonymised or pseudonymised data only wherever possible. We remain responsible for your personal information as the controller; and
- any third party to whom we are proposing to sell or transfer some or all of our business or assets.

We may also disclose your personal information if required by law, or to protect or defend ourselves or others against illegal or harmful activities, or as part of a reorganisation or restructuring of our organisations.

**International Transfers**

Where personal data is accessed internationally, this will only occur where appropriate safeguards are applied and the transfer complies with UK data protection laws

## Security

We take reasonable steps to protect your personal information and follow procedures designed to minimise unauthorised access, alteration, loss or disclosure of your information.

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, we implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing.

We ensure that those who have permanent or regular access to personal data, or that are involved in the processing of personal data, are trained and informed of their rights and responsibilities when processing personal data. We provide such access on a need-to-know basis, and have measures in place which are designed to remove that access once it is no longer required.

We will minimise our use of paper documents containing personal information. Where these are needed – for example, paper observation notes – documents will be kept on the researcher's person during fieldwork and travel and in a locked cabinet in IFF Research office until they will be typed and saved securely in a cloud-based folder, accessible only by named researchers. All paper copies will be destroyed (shredded) immediately after.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When it is no longer necessary to retain your personal data, it will be securely deleted.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## *Programme delivery*

Information we use to run the Summer Jobs Programme, such as contact details, placement information, right-to-work checks and payroll details, is kept for up to 6 years to meet our legal requirements.

## *Safeguarding information*

If any safeguarding concerns or incidents are recorded, we may need to keep this information for longer than other programme data. Safeguarding records are retained for as long as necessary to meet our legal, regulatory and duty-of-care obligations.

## *Criminal offence data*

Criminal offence data is retained only for as long as it is needed for eligibility or safeguarding purposes.

### ***Research and evaluation***

IFF Research will keep identifiable or pseudonymised data only for as long as required to complete the evaluation of the programme. Identifiable evaluation data will be deleted by 31 January 2028. Anonymised findings that do not identify you may be retained for longer for reporting and learning.

In some circumstances, we will retain an anonymised dataset (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

You have the right to access, rectify or amend (prior to it being anonymised) your personal data submitted to us. If you wish to pursue this, please contact [programmes@ukyouth.org](mailto:programmes@ukyouth.org).

### **Withdrawing participation**

At any point until 11th June 2026, you can withdraw your participation from the programme. If you withdraw before the start of the study no data will be collected about you, and you will not participate in The Summer Jobs programme.

Should we be informed that you would like to withdraw from the study after some personal data has been collected but before analysis is begun (September 2026), we will not collect any additional personal data from you and will delete all of your survey data collected by IFF Research up to that point. Any data collected by UK Youth will be deleted in accordance with our privacy notice.

We will securely store personal information about you until the end of the study, which is currently planned for 31st January 2027. All information will be stored electronically in a folder in IFF Research's secure cloud system that can only be accessed by named researchers. You can withdraw your permission and ask for all information we hold about you to be deleted until 1<sup>st</sup> October 2027, when the data will be pseudonymised and analysed. After this point it will no longer be possible to remove your information.

If you wish to withdraw from the programme, please contact both the UK Youth and IFF teams using the following email addresses:

- UK Youth: [summerjobs@ukyouth.org](mailto:summerjobs@ukyouth.org)
- IFF Research: [summerjobs@iffresearch.com](mailto:summerjobs@iffresearch.com)

### **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including rights to:

- Request access to your personal data: this enables you to receive a copy of the personal data we hold about you and to check we are lawfully processing it.

- Request correction of your personal data: this enables you to have any incomplete or inaccurate data we hold about you corrected.
- Request erasure of your personal data: this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- Object to processing of your personal data: for example, you can object where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- Request restriction of processing your personal data: This enables you to ask us to suspend the processing of your personal data.
- Data portability: Where the processing takes place on the basis of your consent or contract, and is carried out by automated means, you have the right to request that we provide your personal data to you in a machine-readable format, or transmit it to a third party data controller, where technically feasible.
- Right to withdraw consent to the processing of your personal data: This applies where we have relied on consent to process personal data. Please note that withdrawal of consent will not affect the lawfulness of any processing carried out before withdrawing your consent.

If you wish to exercise any of the rights set out above, please contact the Data Protection Officer with your specific request by email to: [dataprotection@ukyouth.org](mailto:dataprotection@ukyouth.org).

It is important to understand that the extent to which these rights apply to research will vary and that in some circumstances your rights may be restricted.

Ordinarily, you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Please also note that we can only comply with a request to exercise your rights during the period for which we hold personal information that directly identifies you. If we have only collected pseudonymised information (e.g. where we have not collected any names or contact

details) or personal data has been irreversibly anonymised and has become part of the research data set, it will not be possible for us to comply.

### **Changes to this Notice**

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear by contacting you directly.