

DESCRIPTION OF PERSONAL DATA FILE
Personal Data Act (523/1999), section 10

Before completing the description of the personal data file, please read the instructions for completion. Use annexes, if necessary.

Date of description
28 October 2015

<p>1a Controller</p>	<p>Name Owner of personal data file: Ministry of Employment and the Economy, Knowledge Management Department Controller: ESF project implementer</p> <hr/> <p>Address P.O.Box 32, 00023 GOVERNMENT</p> <hr/> <p>Other contact information (e.g. telephone during office hours, e-mail address) 0295 16001</p>
<p>2 Contact person regarding the personal data file</p>	<p>Name Ministry of Employment and the Economy, Managing authority / Sirpa Liljeström</p> <hr/> <p>Address P.O.Box 32, 00023 GOVERNMENT</p> <hr/> <p>Other contact information (e.g. telephone during office hours, e-mail address) sirpa.liljestrom (at) tem.fi , gsm. +358 29 50 47981</p>
<p>3 Name of personal data file</p>	<p>ESF Person</p>
<p>4 Purpose of processing personal data</p>	<p>To monitor the allocation of funds determined in the programme document adopted by the EU commission for Finland, and to monitor the achievement of the objectives set for Finland in the document, data is collected on the participants in different projects. Therefore, the data on the participants in the project measures funded by the European Social Fund is collected to the ESF Person system.</p> <p>A binding obligation based on ESF Regulation 1304/2013 and Common Provision Regulation 1303/2013 entitles the Member States to collect and process personal data for the purpose of monitoring, evaluating and auditing the implementation of the programme, and for the financial management of the programme. The recorded participant data is not used or disclosed for any other purpose.</p> <p>By completing a form, the participants give their signed express consent to the collection and storing of their personal data. When completing the form, the participants have the right to choose to answer "I do not wish to answer" in respect of certain sensitive questions. The EU commission requires that also all attempts to collect data must be documented, i.e. cases where the participant does not want to answer the questions put in the form and where the data thus remains missing. Because the attempts to collect data must be reported, too, the project implementer must also keep the forms appropriately until the time limit set for keeping the documents of the project.</p>
<p>5 Data content of personal data file</p>	<p>Data types:</p> <ul style="list-style-type: none"> • Identification and contact information of the participant: name, personal identity code, address, e-mail and telephone number • Employment status: duration of possible unemployment, absence from working life, or data related to employment • Education: degree of completed education • Household status: data on unemployment, dependent children and the number of adults in the household

	<ul style="list-style-type: none"> • Other background factors: foreign or minority background, disability, disadvantaged position in the labour market, homelessness • In certain types of projects: the participant's own assessment of their capacity for work and/or the impacts of the project <p>ESF Regulation EU 1304/2013 defines the data to be collected on all participants in ESF measures. The following data must be available on all such participants: gender, employment status, age, education and household status. If all this data is not available in respect of a participant, no other data, either, can be reported to the EU commission concerning the person.</p> <p>Part of the data is classified as sensitive, i.e. the answers to some of the questions under the heading "Other background factors". This data is important both for analysing the allocation the ESF support and for analysing the impacts of the support. However, answering these questions is not obligatory and the participant can choose the "I do not want to answer" option in the starting form. The refusal to answer is recorded in the personal data file.</p> <p>For grouping the participant data in different ways, rather comprehensive basic data is collected as data groups when the participants start involvement in the project, and more limited data is collected when they leave the project.</p> <p>The data groups are the basic data individualising each participant, including e.g. availability data, and the data types related to the ESF indicator data of the starting moment, i.e. employment status, degree of education and household status.</p> <p>In the final entry to the personal data file, the availability data of the participant is updated, and the data related to the indicators of the finishing moment is maintained. In certain types of projects, also the participants themselves are requested to evaluate whether the project has been successful from their perspective.</p> <p>In order for the data collected from the different Member States to be comparable to each other, common definitions of monitoring data and common requirements for data integrity are applied to the extent possible. All monitoring data on the participants must also be broken down by gender.</p>
<p>6 Regular data sources</p>	<p>The person providing the data, i.e. the participant in a measure, on the starting form and the final form.</p>
<p>7 Regular provision of data</p>	<p>The participant-specific data in the personal data file is used for follow-up monitoring to be conducted 6 months after the participant has left the project. A statistically representative sample is taken among those participants who have left the project. An external research institution, Statistics Finland or a similar actor conducts the monitoring of the sample participants.</p> <p>Data may be disclosed further only by reporting it at summation level specific to each data type and project, in a manner defined by the managing authority in compliance with the obligations laid down in ESF Regulation 1304/2013. In principle, data is disclosed at summation level to an evaluator for evaluation. Summation data refers to material cleaned of all data identifying the person in question. The reporting cycle varies from a few reports to the Commission during the programme period to annual reporting. The managing authority needs the reporting repeatedly for monitoring and evaluating the programme.</p> <p>To verify whether the financing of an employment policy measure is eligible for ESF support, the URA client service information system of the Employment and Economic Development Offices (TE Offices) inquires the ESF Person system, through a technical user connection, whether an individual job-seeker client has been recorded as a participant in a certain project. The ESF Person system answers the TE office employee "yes" or "no" through the URA system.</p>

	<p>Reporting data summed by data type and by project is disclosed from the personal data file to the authority funding the project, through a technical user connection to the EURA 2014 monitoring system, without showing the data collected for identifying the participants. No summation value is shown if the summation by data type and by age or gender is below 10.</p>
<p>8 Transfers of data to countries outside the EU or the EEA</p>	<p>None.</p>
<p>9 Principles of securing the personal data file</p>	<p>a) Manually processed data</p> <p>The project implementer is responsible for collecting and storing the data in the ESF Person system. The partial implementers of the project collect the data on forms and deliver the forms to the implementer, which is responsible for storing the data and keeping the original forms as instructed.</p> <p>The forms completed by the project participants must be kept in an access controlled space, in a locked cabinet. If the forms are not kept in an access controlled space, the documents must be kept in a strongbox.</p> <p>The forms must be delivered to the project implementer in a reliable and secure manner. Scanning the forms and delivering them by electronic mail is not permitted, except if they can be delivered by secured mail.</p> <p>Preferably, the data must be sent to the recipient by mail, by a registered letter. The envelope must be opaque to prevent anyone from reading through it the data in the forms inside it. In practice, this can usually be ensured by using two envelopes, one inside the other.</p> <p>The forms must not be copied.</p> <p>The project implementer may dispose of the forms containing the data recorded in the ESF Person system as stipulated by the Government Decree on the Eligibility for Support of Expenditure Funded Partly from Structural Funds (358/2014), section 30.</p> <p>The forms must be disposed of verifiably, by shredding or putting them into a locked paper waste container for disposal, as determined by the organisation in question in respect of sensitive documents.</p> <p>A summary referred to in the Personal Data Act (523/1999) can be printed from the ESF Person system as a report concerning an individual person. All prints from the service that contain personally identifiable recorded data are marked with classification level III.</p> <p>b) Data processed by EDP</p> <p>Through the technical user connection of the EURA 2014 system, the managing authority grants the right to store data in the ESF Person system to the implementer of an ESF project that includes measures involving the obligation to record data. For using the ESF Person system, a strong electronic identification of the user is required. The identification must take place by means of the implementer's KATSO identification.</p> <p>The data recorded in the ESF Person system is visible only to a user entitled to record data in the organisation of the project implementer, and only regarding the project in question. The data of the participants in other projects are, on account of their sensitive nature, protected from examination and visibility.</p> <p>The Finnish managing authority for the structural funds has, in respect of named persons, the right to examine all their data within the limits of the domestic acts of Parliament and decrees. The intermediate body, i.e. the authority funding the project or its auditor, has no access to the personal data file and no right to require the project implementer to disclose data at participant level. However, these actors have the right to verify the existence of the original forms containing the</p>

data or participants' refusals of answer recorded in the data file.

The auditor of the actor funding the project is entitled to request the project implementer only to show, but not to deliver, a print or a picture directly from the ESF Person system for verifying the audit trail of the participant data related to a specific measure.

The managing authority is subject to the Community legislation applicable to the period of EU structural fund programmes, and the data recorded in the ESF Person system is disposed of finally only after the programme period has expired. Common Provision Regulation 1303/2013 stipulates a comprehensive and considerably long-lasting obligation to keep the data. The managing authority is subject to Article 140 of Common Provision Regulation 1303/2013, according to which the period for keeping the data extends approximately up to the year 2034 in respect of the participant data collected for the programme period 2014–2020.