Ms Eilis Fallon
Committee Secretariat
Committee of Public Accounts
Leinster House
Dublin 2

Ref: PAC32-I-1700

Dear Ms Fallon,

I refer to your letter of 21st November in relation to a perceived discrepancy between oral information provided at the committee’s hearing on 7th November and a Parliamentary Question answered on 12th November. I am happy to confirm that there is no discrepancy between the information provided at hearing and that provided in response to the Parliamentary Question.

At the hearing in response to a question from Deputy Murphy I undertook to examine a matter relating to the usage of a CV builder software package by one of the JobPath providers. On the day of the hearing this Department also received a related Parliamentary Question from Deputy Murphy referred to above.

The response to the Parliamentary Question addressed the issue raised by Deputy Murphy at the hearing of 7th November. The Department’s contracts with the JobPath providers are in compliance with all relevant legislation and any information shared is contractually-based and necessary to provide an employment service. All contracts in place are governed by and construed in accordance with the laws of Ireland.
I can assure the Deputy and the committee that the JobPath providers are contractually required to register with the Office of the Data Protection Commissioner as data processors and are legally bound to observe and adhere to data protection requirements.

Both contractors have undertaken regular independent audits of their data processes and procedures as part of these contractual obligations. In addition, the Office of the Data Protection Commissioner has conducted audits of each JobPath contractor. Employees of both contractors, and their subcontractors, are subject to the same data protection laws as Departmental staff.

In relation to a CV builder, Abintegro is a software package that is a job-seeking aid which has various tools and features, including a library of video tutorials, a CV builder, a cover letter building tool and advice on completing job applications. It is used by a wide range of universities, media broadcasters and companies (including several based in Ireland) and has been made available by Seetec to jobseekers, who are engaged with the JobPath service as a support for them in obtaining employment. I wish to underline that Abintegro is a popular software tool used by a range of providers in the career development and recruitment space.

When a jobseeker registers with Seetec they are given access to a pre-populated Abintegro account. It is then up to the individual jobseeker to activate this account and once activated they will receive access to the range of services including a job alert system. The jobseekers use of the service is at their discretion and they can opt out of using this service at any time.

If a client chooses to create a CV this is then saved to their own personal email address and not on the Abintegro platform. Only the following data which is encrypted, is stored on the Abintegro platform, the client's name, email address, client ID number and separately the encrypted password. There is no unencrypted data stored outside of Ireland.

I am advised that in late 2017 an issue was raised concerning specifically the CV Builder element of the Abintegro software package and where relevant CV data was stored. Seetec were requested to remove the capacity to store CVs on the Abintegro platform and this functionality was replaced with CVs being stored on the jobseeker's personal email. Therefore, there was no impediment for Seetec in continuing to offer this tool to jobseekers on an optional basis.
I am happy to confirm to the committee, and again to the Deputy, that the Department has not received any notification that the Data Protection Commissioner is conducting an investigation into any of the issues raised in regard to the use of Abintegro by contracted JobPath providers to the Department.

I trust that the above clarifies the matter.

Yours sincerely,

[Signature]
John McKeon
Secretary General

[Date]
November 2019