



Nr.	Item	Explanation
<b>Preventing harassment</b>		
1.	Last update of this record	1.12.2018
2.	Reference number	036
<b>Part 1 - Article 31 Record</b>		
3.	Name and contact details of controller	Controller: European Aviation Safety Agency, Konrad-Adenauer-Ufer 3, 50668 Cologne, Germany Contact: Head of Human Resources Department; <a href="mailto:hr.info@easa.europa.eu">hr.info@easa.europa.eu</a>
4.	Name and contact details of DPO	<a href="mailto:dpo@easa.europa.eu">dpo@easa.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	Not applicable
7.	Purpose of the processing	<p>The purpose of the personal data processing is the processing of cases of alleged harassment by the HR Department and the network of confidential counsellors under the informal procedure. In accordance with the procedure in place, data are collected and processed for the following purpose:</p> <ul style="list-style-type: none"><li>- to provide support and protection to the alleged victims and direct them, if appropriate towards the relevant department;</li><li>- to ensure that cases are handled efficiently and try to solve the problem on the basis of detailed information;</li><li>- to deal with the information received in strict confidentiality so as to ensure the protection of the alleged victims;</li><li>- to attempt conciliation whenever possible;</li><li>- to put in place preventive measures;</li><li>- to monitor the policy and assess its impact and effectiveness;</li><li>- to analyse the request, monitor and prevent psycho-social risks;</li><li>- to identify persons involved in a recurrent or multiple case and to advise the Appointing Authority accordingly;</li></ul>



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		<ul style="list-style-type: none"> <li>- to forward the appropriate information to the authorised actors (AACC, Disciplinary Board, Legal Department) whenever the alleged victim wishes to start a formal procedure;</li> <li>- to answer questions from the Legal Department or the national or Community judicial authorities</li> </ul>
8.	Description of categories of persons whose data EASA processes and list of data categories	<p>EASA processes the data of the following data subjects:</p> <ul style="list-style-type: none"> <li>- Temporary agents</li> <li>- Contract agents</li> <li>- Seconded National Experts (SNEs)</li> <li>- Trainees</li> <li>- Interims</li> <li>- Categories of personal data:               <ul style="list-style-type: none"> <li>- First name, surname; personnel number; job title; administrative status, grade, function and duties; telephone number, address; assignment</li> <li>- data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct);                   <ul style="list-style-type: none"> <li>- - data concerning the data subject's career;</li> <li>- - data concerning the data subject's recruitment and contracts.</li> </ul> </li> </ul> </li> </ul> <p>With the consent of the alleged victim the confidential counsellors will take personal notes, therefore the type of data collected will be of subjective nature dependant on the case in question and the willingness of the data subject to share information. It may only be transmitted in the informal procedure to the parties involved, in the course of procedures relating to harassment and with the explicit consent of victims, except in the exceptional cases provided for by Regulation, when it is necessary to ensure the protection of the persons concerned.</p> <p>With regard to the Confidential Counsellors the personal data processed are the ones provided in the application form and motivation letter, in particular:</p> <ul style="list-style-type: none"> <li>- Personal data allowing the applicant to be identified, i.e. surname, first name, personnel number, category and grade;</li> <li>- Information provided by the applicant to allow the practical organisation of the selection, i.e. address information: street, postcode, town, country, telephone, fax, email;</li> <li>- Information provided by the applicant to verify whether he/she fulfils the eligibility and selection criteria laid down in the related Work Instruction, i.e. information about languages, education, previous work experience etc.;</li> </ul>



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		- Notes and results of the interview.
9.	Time limit for keeping the data	<p>Data collected in relation with a case is stored 5 years. Files are stored for a further 5 years when a judicial or administrative procedure requiring that this documentation to be consulted is still ongoing when the first term expires (e.g. request for compensation, action before the European Court of Justice or national judicial authorities). If the other concerned person has not been informed of the existence of an informal procedure, no data related to that person may be kept in the archives of the HR Department when the case is closed.</p> <p>With regard to the selection of Confidential Counsellors the data retention period for selected applicants is seven years, following the retention of all HR documents as laid down in PO.HR.00001-001. In the case of non-selected applicants, the data retention period is two years following the conclusion of the selection procedure.</p>
10.	Recipients of the data	<p>Data and information transmitted to the confidential counsellors and the HR Department are dealt with strict confidentiality. These data will only be transmitted to the competent actors (AACC and Legal Department) when a formal procedure is launched and with the prior consent of the person who gave them to the recipients. Transmission without prior consent can only occur in exceptional cases, i.e. when necessary to ensure the protection of the alleged victims.</p> <p>In case of the opening of a formal procedure, it might be necessary to provide information to the investigation team or expert, appointed by the AACC to pursue the complaint. In rare cases the HR Department may be required to answer any questions from national or EU judicial authorities.</p> <p>In the context of the informal procedure, the HR Department and the confidential counsellors may have to share some information with other departments/services (medical service/medical advisor). This transmission will be restricted to the information necessary for the competent entity to carry out its task.</p> <p>With regard to the selection and appointment of Confidential Counsellors: authorised members of the HR Department, the Staff Committee Representative nominated for the selection procedure, an external expert invited to support the selection procedure and the AACC.</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so,	No



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	to which ones and with which safeguards?	
12.	General description of security measures, where possible.	Files are kept in a safe in the HR Department. After a meeting with a victim the confidential counsellors shall always hand over personal notes and documents received to the HR Department, where the data is kept in a safe. The data which are sent via e-mail by the Confidential Counsellors are also stored in a dedicated outlook folder which is only accessible to authorised HR staff.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	See privacy statement