

EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	Inspection of EU Delegations
2	Update of the record (last modification date)	04/01/2024
3	Register reference number	741
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	European External Action Service Rond Point Schuman 9A, 1046 Brussels, Belgium Inspection Service - SG.GOV.1 Email:sg-affgen-3-inspection@eeas.europa.eu
5	Identity and contact details of the Data Protection Officer	EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu

6 Purpose of the processing activity

Purpose(s)

Under the general purpose of assessing the performance and the functioning of EU Delegations and Offices, personal data are needed to evaluate staff members' performance vis-a-vis their job description. Personal data are also processed for the purpose of analysing the inter-personal relations affecting the work output and performance of the Delegation as well as data related to family compositions in relation to housing norms and security.

Description

The Inspection Service is established to evaluate the performance and the functioning of the Delegations of the European Union and to give guidance and support to the Delegations and HQ Services in order to contribute to the effectiveness and efficiency of the implementation of Delegations' mission and tasks.

In the course of preparing inspections, the respective inspection teams collect factual data on the Delegation, its mission as well as personal data on the Delegation staff. The latter is done by means of interviews with competent services at Headquarters, consulting personnel files at Headquarters as well as asking all members of staff in the Delegation being inspected to complete an individual information sheet. The personal data in the sheet is collected on a voluntary basis. The Privacy Statement describing how data is processed linked to the Inspection activity is communicated to staff when individual sheets are requested to be completed. Subsequent to the inspection, oral debriefings take place with the HoD, the Delegation staff as well as with the concerned EEAS Headquarters/European Commission services. If the inspection becomes aware of information which is necessary to be shared with specific recipients, this information will be distributed only to recipients on a need to know basis.

The Procedure foresees the following documents: flash report, draft report, final report, general reports containing more systemic issues and/or common problems as well as a formal account of the follow-up on the recommendations. The flash report contains the summary of preliminary findings and is addressed to the attention of the Secretary General and senior management of the EEAS concerned immediately after an inspection.

Inspections are implemented in accordance with the "Framework procedure of the Inspection" https://intranet.eeas.europa.eu/system/files/Enriched_documents/final_-_framework_inspection_procedure_-_25-06-2020_0.doc and further information with reference documents is available on the intranet: <https://intranet.eeas.europa.eu/page/eeas-work/inspection-service-internal-audit/inspection-service> .

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7	Legal basis and lawfulness	<p>Lawfulness</p> <p>:</p> <p>The processing of your personal data is necessary for the performance of a task carried out by the EEAS in the public interest, in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 1725/2018] as referred to in Recital 22 thereof. Filling in the Individual information sheet is nevertheless voluntary for all staff members.</p> <p>Legal reference :</p> <ul style="list-style-type: none"> - Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU) – OJ L 201, 3/8/2010, p. 30 , and in particular: - Art. 5.5: The operation of each Delegation shall be periodically evaluated by the Executive Secretary-General of the EEAS; evaluation shall include financial and administrative audits. - Art. 4.3(b): The central administration of the EEAS shall also include: [.....] departments for [.....], internal audit and inspections, and [.....] <p>Decision of the Secretary General of the European External Service of 25/06/2020 on the EEAS Inspection Service https://intranet.eeas.europa.eu/system/files/Enriched_documents/decision_of_the_sg_of_eeas_on_the_inspection_service_admin2020_5_final_signed.pdf including in its annex the mandate of the service</p> <p>“Framework procedure of the Inspection” https://intranet.eeas.europa.eu/system/files/Enriched_documents/final_-_framework_inspection_procedure_-_25-06-2020_0.doc</p> <p>Further reference: Code of Good Administrative Behaviour .</p>
8	Categories of individuals whose data is processed - Data subjects	<p>Data is processed from the following individuals or group of people:</p> <p>All Delegation staff, including</p> <ul style="list-style-type: none"> Officials Contract Agents Local Agents Temporary Agents Junior Professionals in Delegation Seconded National Experts <p>Staff conducting the inspection and commenting on the inspection report</p>

9 Categories of data - Data processed

I. Data provided by staff members on the individual sheets

Name

Personnel Number

Nationality

Date and place of birth

Gender

Marital Status and number of children

Contractual status and duties

Education

Employment, including career in the European Union

Linguistic and computer knowledge

Training completed

A breakdown of activities as a percentage of total working hours

Personal description of the work carried out with an indication of the proportion of time spent on these tasks

Personal conception of main challenges and how to overcome them

II. Data processed by the Inspection team

Report of the Inspection Team, including recommendations, flash reports, annexes, notes on specific issues, if relevant, among others based on the oral debriefing

Information about follow-up of recommendations

Inspectors' notes

Other documents shared by Delegation staff on a voluntary basis, such as e-mail exchanges, reports, etc.

Notes taken by the Inspection team during their inspection mission are kept by the Inspection team for the purposes of preparing their report and are destroyed once the final report has been issued. Individual sheets filled in by the Delegation staff ahead of the inspection mission are destroyed once the final report has been transmitted.

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10	Recipients of data – Access to data	<p>Access to the individual information sheets completed by the EU Delegation staff members on a voluntary basis is granted only to the members of the Inspection Division.</p> <p>Following the end of each inspection visit, a flash report are shared with the senior management, draft reports setting out findings and recommendations is circulated to the Heads of Delegations and to the relevant EEAS and COM services for their comments. The final report, approved by the EEAS Secretary General, and with the received comments to the draft report attached as an Annex, is circulated to the Heads of Delegations and all relevant EEAS and Commission Services.</p> <p>The inspection report, which provides an overall and specific assessment on performance of the EU Delegation and the formal account of the follow-up of recommendations are transmitted to the Head of Delegation and to Headquarters Services (EEAS and Commission) concerned on a need to know basis, including the EEAS Directorate for Budget and Administration (DG BA). A copy of the report is also provided to the EEAS Mediation Service. In the event of suspicion of fraud and conduct which could lead to disciplinary action, the information may be communicated to OLAF and IDOC respectively. Along with OLAF and IDOC, the Court of Auditors, the EEAS internal audit and ex-post control divisions may also be granted access to the reports.</p> <p>Upon request, future Heads of Delegation may consult the latest inspection report of the Delegation they are joining. In exceptional cases, the report or part of the report may be disclosed to a Member State representative if a Head of Delegation appointed from a Member State is concerned. Personal data is not intended to be transferred to a Third Country or an International Organisation.</p> <p>The given information will not be communicated to third parties, except where necessary for the purposes outlined above.</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	N/A
12	Time limit for keeping the data - Retention period	<p>Data contained in the individual information sheets will be retained for the period of preparation, inspection mission and establishing the inspection report, after which they are destroyed (usually within 12 months). Observations of Inspectors in personal notes are not retained. The Inspection files will be sorted and kept in the Inspection archives for 7 years. Specific notes may be destroyed after the retention period of 7 years. After sorting, all other working documents are destroyed.</p> <p>The Inspection files are kept under lock and key in the archives of the Inspection Division.</p> <p>The core content of a file may contain the following:</p> <ul style="list-style-type: none"> Documents establishing the dates for the inspection A list of preparatory meetings carried out at Headquarters A programme for the Inspection visit, including names of staff interviewed and external entities consulted, e.g. Member State Ambassadors, representatives of international organisations A draft and final Inspection Report (including an Annex with Recommendations) Documents related to the follow-up concerning the implementation of the Recommendations <p>At the end of the retention period of 7 years, the sorted files will be sent to the historical archives of the EEAS for permanent conservation.</p>

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13	Data Storage	<p>The unclassified electronic data is stored in EEAS computer system on the Division's y-drive while the classified (EU-R/R-UE) electronic data is stored in RUE.</p> <p>Paper copies are stored in a locked archive under the supervision of the Head of Division, or locked in cupboards of the responsible staff member.</p> <p>Paper copies or USBs used by the Inspection Service teams during their missions and when not in use kept under lock and key by the officials responsible for the Inspection.</p>
14	General description of security measures	<p>Appropriate organisational and technical security measures will be ensured according to the data protection legislation applicable to EU institutions and bodies. The collected personal data are stored on servers that abide by the pertinent security rules. Personal data will be processed by assigned staff members. Files are only accessible to authorised staff members. Measures are provided to prevent non-responsible entities from accessing data. General access to all collected personal data and all related information is only possible to recipients with a User ID/Password. When not in use, physical copies of the collected personal data is stored in a properly secured way.</p> <p>Specific security measures:</p> <p>The unclassified electronic data is stored in EEAS computer system on the Division's secured common drive while the classified (EU-R/R-UE) electronic data is stored in RUE.</p> <p>Paper copies are stored in a locked archive under the supervision of the Head of Division, or locked in cupboards of the responsible staff member.</p> <p>Paper copies or USBs used by the Inspection Service teams during their missions and when not in use kept under lock and key by the officials responsible for the Inspection</p>
15	Rights of individuals	<p>Data subjects have the right of access to their personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, data subjects have the right to ask the deletion of their personal data or restrict their use as well as to object at any time to the processing of their personal data on grounds relating to their particular situation.</p> <p>The EEAS will consider the request, take a decision and communicate it to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. Data subjects are informed in the Privacy Statement that they can find more information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725.</p> <p>In specific cases, restrictions under Article 25 of the Regulation may apply. If data subjects have questions concerning the processing of their personal data, they may address them to the Data Controller via the functional mailbox:</p>
16	Information to data subjects	<p>A specific Privacy Statement is available for data subjects on the intranet/internet.</p> <p>The Privacy Statement is also attached to related communication.</p>