

**Record of processing activity  
Part 1**

Name of the data  
processing:

Informal procedure for preventing harassment at work

Created on

02/07/2019

Last update

Reference number

052

Year

2019

1. Controller:

European Economic and Social Committee

2.a) Service responsible

Confidential counsellor

2b) contact details

The person responsible for the processing of personal data is the confidential counsellor contacted

The coordinator of the panel of confidential counsellors is Jane Hughes

[Jane.hughes@eesc.europa.eu](mailto:Jane.hughes@eesc.europa.eu)

3. Joint controller

Not applicable

4. DPO: contact details

[data.protection@eesc.europa.eu](mailto:data.protection@eesc.europa.eu)

5. Processor(s) (where  
applicable)

Not applicable

6. Purpose(s) of the data  
processing

The personal data is collected and processed only for the following purposes:

- to provide support in the event that you feel you have been experiencing workplace conflict/possible harassment or any other inappropriate behaviour and to direct you, where necessary, to the appropriate services;
- for statistical reasons (anonymised data), in order to monitor the effectiveness of the EESC's anti-harassment policy.

7. Description of the categories of persons whose data are processed

Any member of the staff that come to see the confidential counsellors

8. Description of data categories processed

Only the information provided by the person who comes to see the confidential counsellor will be processed. The name will only be recorded with the agreement of the person.

The confidential counsellor is allowed to take notes during a consultation (for example, allegations, statements, information on the case) and to receive documents that the person would like to submit (for example, messages, emails or any other document) only where the person considers this necessary and with their written consent.

9. Time limit for retaining the data

During the informal procedure, the confidential counsellor in charge of the file is responsible for storing the case file in a safe place (locked). Once a case is considered to be closed, or at the latest three months later, the confidential counsellor sends the anonymised case file (retaining only your gender and unit (or directorate where there is a risk that you could be identified)) to the coordinator of the panel of confidential counsellors, who stores the case file for a maximum of five years.

This period of five years is considered necessary for the panel of confidential counsellors to carry out its mandate, particularly as regards the monitoring and evaluation of the policy and the identification of any recurring cases for the purposes of prevention.

10. Recipients of the data

Personal data provided may only be forwarded to the person's line manager(s) if this is deemed necessary in the event of workplace conflict/possible harassment and only with their consent.

In the event of an administrative inquiry or disciplinary proceedings, any personal data collected during the informal procedure may be sent to the competent bodies only with the person's consent.

Data may be transferred without the person's consent only in the event of a judicial procedure. The confidential counsellor will inform the person concerned of this in advance.

11. Transfers of personal data to a third country or an international organisation	No data will be transferred to a third country or international organisation
12. General description of security measures, where possible	Electronic documents sent to the confidential counsellor are kept in a secure environment (protected by a password) or a disk which is not accessible to third parties. Any files containing paper documents are kept by the confidential counsellor under lock and key.
13. Privacy statement	<a href="#">Confidential counsellors</a>
<b>Part 2 Compliance check and risk screening</b>	
1.a) Legal basis and reason for processing	<p style="text-align: center;">necessary for the performance of a task carried out in the public interest</p> <p><input type="checkbox"/> (a) or in the exercise of official authority vested in the Union institution or body</p> <p><input type="checkbox"/> (b) necessary for compliance with a legal obligation to which the controller is subject (see point 1b) below)</p> <p><input type="checkbox"/> (c) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p><input checked="" type="checkbox"/> (d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p> <p><input type="checkbox"/> (e) necessary in order to protect the vital interests of the data subject or of another natural person</p> <p>[Tick (at least) one of the boxes]</p>
1b) Legal basis	The provisions of <a href="#">Decision No 200/14 A concerning the procedures for preventing and dealing with psychological and sexual harassment at work within the Secretariat of the European Economic and Social Committee</a> are applicable.
2. Are the purposes specified, explicit and legitimate?	Yes
3. Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)?	The data will not be processed for any other purpose.
4. Do you really need all the data items you plan to collect?	Only the data the person provides will be processed.
5. How do you ensure that the information you process is accurate?	The data is provided directly by the person concerned

6. How do you rectify inaccurate information?	
7. Are they limited according to the maxim "as long as necessary, as short as possible"?	Yes
8. If you need to store certain information for longer, can you split the storage periods?	Yes, the storage period for the statistical data (anonymised) is longer (5 years)
9 How do you inform data subjects?	Through the privacy statement
10. Access and other rights of persons whose data are processed	Queries can be direct to the confidential counsellor contacted. The query will be dealt with within one month.
11. Does this process involve any of the following?	<input type="checkbox"/> (a) data relating to health, (suspected) criminal offences or other special categories of personal data <input type="checkbox"/> (b) evaluation, automated decision-making or profiling <input type="checkbox"/> (c) monitoring data subjects <input type="checkbox"/> (d) new technologies that may be considered intrusive
<b>Part 3</b>	
<b>Linked documentation</b>	
1. Links to threshold assessment and DPIA (where applicable)	 No hyperlink inserted
2. Where are your information security measures documented?	 No hyperlink inserted
3. Links to other documentation	 No hyperlink inserted
4. Other relevant documents	