



European Committee
of the Regions

Record of processing activity – Working document

Dignity at work, Conflict Management, Combatting harassment

PART 1 - Record

1. General Information

Reference number	RE3-8
Last update	25/09/2024
Controller	European Committee of the Regions
Directorate	Directorate E
Unit	E.3 Working conditions and talent management
Contact details	<p>workingconditionscor@cor.europa.eu</p> <ul style="list-style-type: none">- contact persons: line managers, confidential counsellors, Social Worker, Doctor and nurses of CoR, HR Legal advisor, Head of Unit of the Unit Working Conditions- coordinator of contact persons- mediator: confidential counsellors, Social Worker, Head of Unit of the Unit Working Conditions- conciliator: Director and Deputy director of Directorate Human Resources and Finance, Head of Unit of the Unit Working Conditions- Legal service of the CoR
Joint controller	N/A
Joint controllership arrangement	N/A
DPO contact details	data.protection@cor.europa.eu
Processor(s)	N/A
Data processing agreement	N/A

2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	<p>The personal data may be collected and processed in the framework of informal or formal mechanisms to prevent and help resolving interpersonal conflicts, as well as preventing and combatting psychological and sexual harassment at the work place of the CoR. Personal data may be collected and provided at different stages of the informal or formal procedures:</p> <ul style="list-style-type: none">- when a contact person assists or advises the person seeking to resolve the conflict- when the conflicting persons request a mediation or conciliation procedure- when the administration envisages adopting precautionary measures- when the administration replies to a request for assistance on basis
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	<p>of article 24 SR or request/complaint based on art. 90 SR - when the administration envisages opening an investigation and establishes a preliminary assessment</p>
<p>Categories of persons whose personal data are processed</p>	<p>All staff members, officials, temporary and contractual agents, END, trainees and persons employed under private law contracts at the CoR can make use of the informal and formal conflict resolution mechanism as person seeking the resolution of the conflict, as witness or person to be heard.</p>
<p>Categories of personal data processed</p>	<p>Only data that is appropriate and necessary with regard to the subject matter and the proper conduct of a procedure related to resolving an interpersonal conflict, preventing or investigating on an alleged wrongdoing affecting the dignity at work, being an alleged harassment or discrimination, are likely to be processed under this procedure. These data are processed within the strict framework of the described procedures taking into account its particularly sensitive nature.</p> <p>As an indication but not exhaustive, the following personal data may be processed as part of an informal or formal procedure aiming to prevent or resolve a conflict at work:</p> <ul style="list-style-type: none"> ☐ identifying data (name, date of birth, address, telephone etc.); ☐ administrative data (grade, department (s) of assignment, functions and responsibilities, etc.); ☐ data relating to the state of health of the persons concerned; ☐ allegations, statements, information concerning the conflict at hand from victims, accused persons, witnesses or persons intervening in other capacities; ☐ the dates of consultations with a contact person, the stages of a possible mediation or conciliation procedure; ☐ with the written consent of the person who consulted the contact person, the latter is authorized to take personal notes during a consultation as well as to receive documents that his interlocutor would like to submit to him, provided that he considers it necessary for the accomplishment of its mission. <p>The processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as the processing of data relating to health or sexual life is prohibited unless this may be justified by a circumstance set out in Article 10 (2) or (4) of Regulation (EU) 2018/1725. The processing of data relating to offenses, criminal convictions or security measures may only be carried out if this proves necessary and subject to specific and appropriate guarantees.</p>
<p>Recipients of the personal data</p>	<p>Concerning the informal procedure: Personal data may be transmitted to contact persons, coordinator of the contact persons, mediator or conciliator or other persons involved in the conflict resolution with consent of the data subject.</p> <p>Concerning the formal procedure: In case of an Art. 24 SR request for assistance procedure, Art. 90 SR procedure or an administrative enquiry and disciplinary procedure, personal data processed by the administration in accordance with the procedure and may involve: Unit EI-HR legal sector, Head of Unit E3, director (and/or deputy</p>

	director) of the Directorate for Human Resources and Finance, secretary-general (Appointing Authority) and members of his cabinet, Legal service, respective persons of the EESC if the conflict involves staff members of both institutions, Court of Justice.
Transfers of personal data to a third country or an international organization	No, your personal data will not be transferred to a third country or international organisation.
Retention period of the personal data	<p>Concerning the informal procedure:</p> <ul style="list-style-type: none"> - the personal data provided to contact persons are only kept for the duration of the consultation process, without conservation of personal data by the contact person once this process has been terminated. - the personal data provided to the mediator or conciliator are only kept for the duration of the mediation and conciliation process, including the period of agreed follow-up by the mediator and conciliator. <p>Concerning the formal procedures:</p> <ul style="list-style-type: none"> - the personal data are treated pursuant to the specific ROPA and Privacy statement concerning notably the Art. 24 SR request for assistance procedure, Art. 90 SR procedure and administrative enquiry and disciplinary procedure.
General description of security measures, where possible	<p>Regarding paper files</p> <p>Concerning the informal procedure: no data are kept, except working documents that have to be kept confidential in a locked place, transmitted in a confidential way (by hand or double closed envelope) and be destroyed by the contact persons, mediator, conciliator, once the consultation has been terminated.</p> <p>Concerning the formal procedure: see the respective ROPA concerning the specific formal procedures.</p> <p>Regarding electronic files</p> <p>Concerning the informal procedure: no data are kept, except working documents that have to be kept confidential and transmitted in a confidential way (password protected, on an individual folder or on a shared folder with reduced access to the only persons involved) and be destroyed by the contact persons, mediator, conciliator, once the consultation has been terminated.</p> <p>Concerning the formal procedure: see the respective ROPA concerning the specific formal procedures.</p>
Data protection notice	Published internally