



European Committee
of the Regions

Record of processing activity – Working document

EU Learn

PART 1 - Record

1. General Information

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| Reference number | RE3-10 |
| Last update | 05/10/2023 |
| Controller | European Committee of the Regions |
| Directorate | Directorate E |
| Unit | E.3 Working conditions and talent management |
| Contact details | CORTrainingOffice@cor.europa.eu |
| Joint controller | N/A. |
| Joint controllership arrangement | N/A |
| DPO contact details | data.protection@cor.europa.eu |
| Processor(s) | The European Commission (HR.C.4) processes the personal data of the CoR staff, on behalf of the CoR in order to comply with the services agreed in the Service Level Agreement (SLA) between the institutions. |
| Data processing agreement | N/A |

2. Purpose and description of the personal data processing

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| Purpose(s) of the personal data processing | <p>This system is used to plan, organise, manage and evaluate training actions and learning opportunities for CoR staff. The data controller collects and uses the information for the following purposes:</p> <ul style="list-style-type: none">• to plan and organize training activities for CoR staff,• to manage all the procedures of training actions (create and publish courses, create training applications, validate training requests, register and enrol, follow-up of participation and evaluation)• to facilitate internal communication towards different target groups according to their functions /interest• to create a training history log for staff• to evaluate the training actions in view of quality control and to evaluate participants learning status in view of career steps according to staff regulations |
| Categories of persons whose personal data are processed | <ul style="list-style-type: none">- All staff members (including internal trainers),- External participants (staff of other institutions, bodies and agencies);- External trainers provided by training contractors. |

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| <p>Categories of personal data processed</p> | <p>a) Regarding staff members:</p> <ul style="list-style-type: none"> - Attendance data of participants of classroom courses and - Scores of placement and other tests, entered by the trainer or course manager <p>b) Regarding external trainers:</p> <ul style="list-style-type: none"> - names of the trainers and the names of the contractors, - the dates on which courses have been planned/delivered and by whom, - the evaluation by the participants of the course and the trainer. <p>The objective of this evaluation is to maintain and guarantee the quality of the training.</p> |
| <p>Recipients of the personal data</p> | <p>Access to data is provided to authorised staff according to the “need to know” principle.</p> <ul style="list-style-type: none"> • Participants (i.e. staff of the CoR) can access details of their own learning history, current and planned learning activities, as well as the data held in their personal profile. Participants can see the first name and last name of other participants who are enrolled in the same course or community or practice as they are. • Course managers in CoR Training Service (ie, staff responsible for planning and administering courses) for the planning, organisation, management and evaluation of courses and learning opportunities Course managers have access to most personal data of the participants, including enrolment in past, current and future learning opportunities, attendance data and test results. • Trainers have access to attendance data and test results of participants who are enrolled in courses they're teaching. Trainers have access to the aggregated and anonymised evaluations pertaining to the courses their employer is contracted to deliver through a generic contractor access. They also have access to the ratings of the course and the trainer by the participants through the catalogue of EU Learn. The contractors that employ and deliver the trainers have access to the evaluation data of the courses they have been contracted to deliver, to allow them to monitor the quality of the services. • Training validator (ie, the person who the participants have identified as the person that needs to approve their request for enrolment in a learning activity, usually the line manager) for the validation of the learning requests. Training validators have access to the course attendance data and test results of those participants for whom they have approved the enrolment. • System administrator can access all data and activities in the system. |
| <p>Transfers of personal data to a third country or an international organization</p> | <p>No</p> |
| <p>Retention period of the personal data</p> | <p>All training records are kept for the duration of the staff member’s career and for ten years after that staff member leaves the</p> |

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| | <p>employment.</p> <p>Certain data need to be conserved for a longer period if they are related to ongoing rights and obligations, i.e. certification of participation in a training. This is particularly important for training activities that have an impact on the career path of the staff member, i.e. for language training connected to Article 45(2) (proficiency in a third language before promotion) and for training of a compulsory or pre-requisite nature.</p> <p>Presence lists of the training actions that are completed are kept in paper version (and scanned in ABAC) as justification document for the payment and audit of the external contractor's invoices.</p> <p>Evaluations of the training actions in paper format are kept according to the duration of the contract with the external contractors (maximum 5 years). Personal data of external trainers are stored until the end of the trainer's activity in the Commission. The retention period for the evaluation of training actions is in general limited to the duration of the contracts with the external providers.</p> |
| <p>General description of security measures, where possible</p> | <p>Regarding paper files Presence lists of the training actions that are completed are kept in paper version (and scanned in ABAC) as justification document for the payment of the external contractor's invoices.</p> <p>Regarding electronic files All training records are kept for the duration of the staff member's career and for ten years after that staff member leaves the employment. Certain data need to be conserved for a longer period if they are related to ongoing rights and obligations, i.e. certification of participation in a training course. This is particularly important for training activities that have an impact on the career path of the staff member, i.e. for language training connected to Article 45(2) (proficiency in a third language before promotion) and for training of a compulsory or pre-requisite nature. Evaluations of the training actions in paper format are kept according to the duration of the contract with the external contractors (maximum 5 years). Personal data of external trainers are stored until the end of the trainer's activity in the Commission. The retention period for the evaluation of training actions is in general limited to the duration of the contracts with the external providers.</p> |
| <p>Data protection notice</p> | <p>Published internally</p> |