

DATA PROTECTION STATEMENT

TRAINING

Organisational part of the Agency entrusted with the processing of personal data

Head of RSC (information(at)osha.europa.eu)

Purpose

The learning and development of staff member is necessary for career development and professional growth

A) Course participants

- To plan and organize training activities for the whole Agency staff, as well as staff of other Institutions and Agencies.
- 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 or centres of interest.
- To create a training history log for all staff.
- To evaluate the training actions in view of quality control.
- To evaluate participants learning status in view of career steps according to staff regulations.

B) External trainers

- To collect and use your personal information to be able to improve learning and development activities.
- To process feedback collected from the participants in order to deliver better and more effective learning and development opportunities, which take due account of the participants' needs, the overall objective being to provide all staff with the knowledge and skills necessary for their job.

Legal basis

- Council Regulation (EU) 2019/126 of the European Parliament and of the Council of 16 January 2019 establishing the European Agency for Safety and Health at Work (EU-OSHA), and repealing Council Regulation (EC) No 2062/94.
- EU-OSHA Decision no. ICS/20/07 Guide and Policy on Training;
- Art. 20 1c) of the Regulation.

Type of data processed

Data subjects are all staff members (including internal trainers), external participants (staff of other institutions and agencies) as well as external trainers provided by training contractors.

A) Data processed - Staff members:

The staff data collected includes:

- Staff data: first name and surname, personnel number, grade, unit, languages and CEF levels, telephone number.
- Title of training course, training course starting date, training course ending date, training course duration, training course costs, number of hours/days recorded, individual training objectives, individual training reason/purpose, individual training evaluation forms, attendance certificates, training course presence lists, purchase orders, confirmation by training providers, registration documents/forms.
- Attendance data of participants are entered by the course manager and/or trainer, as well as scores of placement and other tests. Participants who do not have an appropriate security pass may have to enter their passport number or ID card number and nationality in order to request access to Commission premises. All other data come from CUD (database of user IDs, names and organisations used by DG DIGIT which comprises personal profiles of Commission staff and Executive Agencies) and COMREF (common reference database of the Commission for HR data) thus providing all personal profiles for the LMS.

B) Data processed - External trainers:

Data collected contains names of the trainers and the names of the contractors, the dates on which courses have been planned/delivered and by whom, and the evaluation by the participants. Regarding course evaluation, following each training course the participants are requested to evaluate the course and the trainer. The objective of this evaluation is to maintain and guarantee the quality of the training.

After finalisation of these evaluations by the participants, the external trainers can access the evaluations by the participants, without the identities of the participants submitting the evaluation being revealed to them. The trainers can send any comments to the course manager regarding the evaluation.

Additionally, the LMS systems provides the possibility for statistical reports about evaluations regarding the trainer as analytical dimension, either in view of evolution of quality of course content and trainer over a certain period of time or regarding the follow-up of the training providers in the performance of their teachers.

Course evaluations are transmitted anonymously to trainers.

Lawfulness of processing

The processing is based on Article 5.1 (a),(d) of [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection

of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (hereinafter the Regulation).

Data recipients

Access to data is provided to authorised staff according to the “need to know” principle.

- Head of Unit who approves the training application for a staff member in the respective Unit.
- Head of Administration and Human Resources Section (staff in charge of learning and development known as course managers).
- Appointing Authority (Executive Director).
- Finance Department for reimbursement of mission cost connected to an external training.
- Training provider – suppliers and contractors delivering direct service for the agency and for the management of online learning opportunities in the Learning Management System, for accounting purposes and the evaluation of the training actions and trainer for which they are responsible.
- Training provider – external: selected by the staff member concerned.
- Trainers can access details of their course, the participants in the courses they are giving and the evaluations of their courses and themselves by course participants. Course evaluations are transmitted anonymously to trainers.

The data subject's rights

Data subjects have the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or, where applicable, the right to object to processing or the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal (Articles 17, 18, 19, 20, 22, 23 and 24 of the Regulation).

Any requests to exercise one of those rights should be directed per email to the organisational part of the Agency entrusted with the processing operation as indicated in this privacy statement, including in the subject the words “data protection”.

Data subjects' rights can be restricted only in the cases foreseen in Art 25 of the Regulation.

Candidates have a right of access to their evaluation results.

Information on the conservation period of data

The Agency keeps the data of the course participants for the time necessary to fulfil the purpose of collection or further processing.

- 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.

- Certain 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 are kept in the personnel file for 10 years following the termination of employment or the last pension payment.
- Presence lists of the training actions that are completed are kept in paper version for the periods determined under the Financial Regulations as justification document for the payment of the external contractor's invoices.
- Evaluations of the training actions are kept according to the duration of the contract with the external contractors.

Security measures

Throughout this procedure only authorised people are attributed access rights and only on a "need-to-know" basis.

Any possible security measure is taken to prevent any improper use of or unauthorized access to the

electronic file. Procedure-related documents are kept in a secure environment, on an encrypted data carrier, or locked in cupboards/drawers.

Request for information

For any further information regarding the handling of their personal data, data subjects can address their request to EU-OSHA Data Protection Officer at: [dpo\(at\)osha.europa.eu](mailto:dpo(at)osha.europa.eu).

Recourse to the EDPS

Data subjects are entitled to make recourse to the European Data Protection Supervisor: <http://www.edps.europa.eu>, should they consider that the processing operations do not comply with the Regulation.

Date when processing starts

Entry of a training session into the database.

Privacy statement last updated: 5/29/2019 4:52:53 PM