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Subject: Prior check Opinion on selection and administrative management of Blue Book Trainees in EEAS Headquarters and EU Delegations (case 2016-0771)

On 1 September 2016, the European Data Protection Supervisor (EDPS) received a notification for prior checking under Article 27.2 of Regulation (EC) No 45/2001 (the Regulation) relating to selection and administrative management of Blue Book Trainees in the European External Action Service (EEAS) and EU Delegations (Delegations).

As this is an ex-post prior check, the two-month deadline within which the EDPS must deliver his opinion does not apply. This case has been dealt with on a best effort basis.

Since the EDPS has already issued Guidelines on staff selection and recruitment¹, the assessment of the processing activity has focused on those aspects where the processing operations diverge from the Guidelines or otherwise need improvement.

Facts

For the selection, recruitment and management of blue book trainees, EEAS cooperates with the DG EAC of the European Commission's Traineeship Office. This cooperation is formalised in a service level agreement. The administrative management of selection of blue book trainees at EEAS is divided into two steps, (I) the pre-selection of candidatures into the Blue book database and (II) the selection of trainees from the Blue book database.

¹ Guidelines concerning the processing operations in the field of staff recruitment, available on the EDPS website under Supervision, Thematic Guidelines.

For the initial step, DG EAC Traineeship Office provides anonymous files of candidatures on an on-line platform, where the files are password protected. Selected EEAS staff has temporary access to the files during the pre-selection phase. After the pre-selection, access is withdrawn and no paper copies are kept.

For the second step, DG EAC Traineeship Office provides access to all EEAS staff to the virtual Blue book. The files do not contain contact details of the trainee candidates. The Office of the Managing Directors at EEAS communicates their proposals to the Trainee coordinator of the EEAS, who books the selected candidates in the Blue Book database and forwards the list of selected candidates by Ares to DG EAC Traineeship Office Unit. The rest of the recruitment process is managed by the Traineeship Office.

At the end of the traineeship, an evaluation report is prepared by the EEAS and shared between EEAS and DG EAC. EEAS will destroy all personal data maximum two years after the end of the traineeship.

Information to data subjects

The EDPS notes that all information required under Articles 11 and 12 of the Regulation is provided in the privacy statement. Point 7 of the notification mentions that a privacy statement it is available on the intranet (EEAS zone). The EEAS has also explained that the privacy statement is available on the EEAS website. However, since this information could be overlooked, the EDPS **recommends** that the EEAS provide the data subjects with the privacy statement before the selection procedure begins. A good practice is to include a link to the privacy statement in the actual vacancies.

In light of the accountability principle, the EDPS expects the EEAS to implement the above recommendation accordingly and has therefore decided to **close the case**.

Yours sincerely,

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Cc.: [...], DPO EEAS