

REGISTER NUMBER: 140

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 3 January 2007

Case number: 2007-003

Institution: European Central Bank

Legal basis: article 27-5 of the regulation CE 45/2001 ⁽¹⁾

⁽¹⁾ OJ L 8, 12.01.2001

INFORMATION TO BE GIVEN⁽²⁾

⁽²⁾ Please attach all necessary backup documents

1/ Name and adress of the controller

Deputy Director General Human Resources, Budget and Organisation (Berend van Baak)
European Central Bank
Postfach 16 03 19
D-60066 Frankfurt am Main - Germany

2/ Organisational parts of the institution or body entrusted with the processing of personal data

Directorate General Human Resources, Budget and Organisation (DG-H) - Recruitment and Staff Development Division

3/ Name of the processing

Recruitment Procedure

4/ Purpose or purposes of the processing

Recruitment Procedure: management of application(s) submitted in response to vacancy announcements in view of a possible pre-selection (short-listing) for interview and subsequent selection process (interviews, tests) for final recruitment.

5/ Description of the category or categories of data subjects

All registered applicants for open vacancies (non-interviewed, interviewed and selected)

6/ Description of the data or categories of data (including, if applicable, special categories of data (article 10) and/or origin of data)

a) Application:

- Basic personal data (name, address, date and place of birth, place of residence, telephone, e-mail, nationality)
- Work experience (name of employers and description of tasks and responsibilities, start and end date of employment)
- Education and training (name and type of degree/diploma/qualification, name of awarding institution and date awarded)
- Courses
- Language skills
- Computer skills
- References, memberships, stays abroad
- Answers to additional motivational questions
- answers to questions on convictions

b) Selection Process:

- Assessment of candidates against criteria outlined in the vacancy note
- Assessment of candidates' performance

7/ Information to be given to data subjects

Information is provided on the ECB Working for Europe website, see annex 1.

Rules for recruitment are defined under the Administrative circular 05/2004 Rules for Recruitment (annex 2) and are available on the ECB Working for Europe website

8/ Procedures to grant rights of data subjects (rights of access, to rectify, to block, to erase, to object)

a) Application:

See extract of annex 1 which reads:

How can you verify, modify or delete your information?

As an applicant you have the right to access and update or correct data online. Please note that for practical reasons (of a technical nature) there is no possibility to update and correct data after the deadline of the competition. You can of course update data if you decide to participate as a candidate in another competition of the ECB.

You have also the right to have recourse at any time to the European Data Protection Supervisor.

b) Selection Process:

All interviewed candidates have access - upon request - to the part of the selection proposal that refers to their individual performance at interviews and test(s). There is no right to modify.

9/ Automated / Manual processing operation

Both automated and manual processing operations are performed.

After the closing date of the campaign, the recruiting business area may print hard copies of the applications. After the short listing meeting, a memorandum is produced to (1) explain the reasons for short-listing (or not) of candidates, (2) to explain the envisaged selection process. The short-listing memorandum is signed (on hard copy / electronically) by all Selection Committee members and stored electronically in the E-recruitment tool.

After the selection meeting, a memorandum is produced to (1) explain the reasons for selection (or not) of candidate(s). Electronic copies of the individual tests are kept within the E-recruitment system under "secure notes" that only DG-H can access. The selection memorandum is signed (on hard copy / electronically) by all Selection Committee members and stored electronically in the E-recruitment tool. The original version of the selection memorandum is kept together with the documents related to the salary offer within the Compensation and Staff Relations Division within DG-H.

10/ Storage media of data

After the final closure of the campaign, applications are kept on a CD-rom for a period of 24 months in a secure room within DG-H.

All documents related to a recruitment campaign (e.g. memoranda) are kept within the E-recruitment tool and auto-archived after 24 months.

Administrative Circular 05/2004 Rules for Recruitment (see annex 2) implementing Article 20.2 of the "Rules of Procedure of the European Central Bank" (Selection, Appointment and Promotion of Staff) (see annex 3)

See extract of annex 1 which reads:

Part of the data you submit (identity, address, education and qualification awarded, work experience, spoken languages and IT skills, answers on motivational questions, etc.) will be accessed by the members of the Selection Committee established for each recruitment procedure. Information regarding gender, disabilities, declaration related to criminal records, etc. will only be viewed and processed by the Directorate Human Resources, Budget and Organisation. The data will not be communicated to third parties or recipients other than the data processor acting on behalf of the ECB in accordance with Art. 23 of Regulation (EC) No 45/2001.

Selection Committee members also have access to the short-listing memorandum, tests, selection memorandum.

After the final closure of the campaign, applications are kept on a CD-rom for a period of 24 months in a secure room within DG-H.

Hard copies of applications are not kept in DG-H.

Documents (memoranda, tests) are auto-archived in the E-recruitment tool after 24 months.

(on justified legitimate request from the data subject)

(Please, specify the time limits for every category, if applicable)

There is no special period foreseen form blocking and erasure of data.

If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification.

There are no rules or procedures in place permitting longer storage periods for historical, statistical or scientific purposes.

There are no such proposed transfers.

16/ The processing operation presents specific risk which justifies prior checking (*please describe*):

X Article 27.2.(a)

Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

A declaration with regard to the absence of any criminal records is signed and submitted to the ECB by the selected candidates only (Annexes 3 & 4)

☒ Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject,

A number of questions in the application form relate to the motivations and competencies of the candidate.

Article 27.2.(c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

☐ Article 27.2.(d)

Processing operations for the purpose of excluding individuals from a right, benefit or contract,

The purpose of the processing of data submitted by candidates is to manage application(s) in view of a possible pre-selection (short-listing) for interview and selection for open positions at the European Central Bank.

Other (general concept in Article 27.1)

17/ Comments

The AC 05/2004 is currently being revised. It is intended to keep the revised version of the AC relatively "high-level". Major changes of procedures which would have an impact of the processing operations on personal data are therefore not to be expected from that revision.

PLACE AND DATE: Frankfurt am Main, 22 December 2006

DATA PROTECTION OFFICER: Wolfgang Sommerfeld [*signed*]

INSTITUTION OR BODY: European Central Bank