



RECORD
of processing activity according to Article 31 Regulation 2018/1725¹

NAME of data processing:

Direct Payment Scheme ('Schooling'): Payment of School Fees and School Transport Costs

Last update: June 2020

1) Controller(s) of data processing operation (Article 31.1(a))

- Controller: Organisational entity of Fusion for Energy (F4E)
 - Unit / Department responsible for the processing activity: Human Resources Unit
 - Contact: HR-DataProtection@f4e.europa.eu
- Data Protection Officer (DPO): DataProtectionOfficer@f4e.europa.eu

2) Who is actually conducting the processing? (Article 31.1(a))

The data is processed by F4E (responsible unit) itself

The data is processed by a third party (e.g. contractor) (Art. 29 – Processor) :

Contact point at external third party (e.g. Privacy/Data Protection Officer): The list of the schools, which have signed an agreement with F4E and their related contact points can be found at [F4E_IDM_2H7RN9](#) with restricted access to HR, Finance and IAC

3) Purpose and Description of the processing (Article 31.1(b))

Why is the personal data being processed? Specify the underlying reason for the processing and what you intend to achieve. Describe, summarise the substance of the processing.

When you (later on) intend to further process the data for another purpose, please inform the Data Subject in advance.

Data is processed to provide eligible F4E staff members and Seconded National Experts (SNEs) with the possibility to register their children to the Direct Payment of School Fees scheme (“Schooling”). Staff members/SNEs whose children are enrolled in one of the schools F4E has signed an agreement with, shall introduce, on a yearly basis, a request for the direct payment of school fees by F4E through e-HR data management tool. They need to introduce the name of the child, the name of the school, the scholar grade each child attends and what kind of school transport they use. The data is processed to check and validate the invoices sent by each school and to pay school transportation costs or reimburse the staff. In this context, F4E just confirms the list of children enrolled which is sent by the schools by email. Only when the list of names differ from the ones declared by the staff, F4E sends an email with the names of the children to the schools either to ratify their continuity in the school or to endorse F4E’s coverage. F4E is not involved in the enrolment of the staff members’ children to schools; it is the staff member who contacts the school and provides on a voluntary basis their personal data for enrolment purposes.

Staff members who directly paid the transport costs shall introduce a request for reimbursement of school transport costs, with proof of the expenditure (invoices or public transportation tickets) as well as proof of payment. The data is also processed to inform Payment Master Office (PMO) on a yearly basis of the list of parents and children benefiting from this scheme in order to avoid PMO paying the school allowance provided for in the Staff Regulations (SR). Finally, statistics may also be issued (with anonymised data) for follow-up purposes.

4) Lawfulness of the processing (Article 5(a)–(d)):

Mention the legal bases which justifies the processing

Processing necessary for:

- (a) performance of tasks in the public interest attributed by EU legislation (including management and functioning of F4E)
- Council Decision of 27 March 2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it” - 2007/198/Euratom, as last amended by Council Decision of 22 February 2021 (2021/281 Euratom), O.J. L 62, 23.02.2021, p.8, in particular Article 6 thereof;
 - Statutes annexed to the Council Decision (Euratom) No 198/2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it”, as last amended on 22 February 2021, in particular Article 10 thereof;
 - [Staff Regulations of Officials \(SR\) and the Conditions of Employment of Other Servants of](#)

[the European Communities \(CEOS\), in particular Art 3 of the annex VII of the SR.](#)

- [Governing Board decision of 17 June 2016 concerning measures to support access to schooling for the children of Fusion for Energy staff.](#)
- [Decision of the Director of Fusion for Energy of 30 September 2009 concerning the signature of administrative agreement between F4E and international schools of Barcelona](#)
- [SLAs signed with the different schools signatories of the agreements](#)

(b) compliance with a *specific* legal obligation for F4E to process personal data

(c) necessary for the performance of a contract with the data subject or to prepare such a contract

(d) Data subject has given consent (ex ante, freely given, specific, informed and unambiguous consent)

5) Description of the data subjects (Article 31.1(c))

Whose personal data is being processed?

- 1) Staff members (officials, temporary agents and contract agents) or
- 2) Seconded National Experts of Fusion for Energy and their children eligible to Fusion for Energy Schooling scheme.

6) Categories of personal data processed (Article 31.1(c))

Please give details in relation to (a) and (b). In case data categories differ between different categories of data subjects, please explain as well.

(a) **General personal data:**

- Staff Member: name, surname, personnel number, contract type, place of employment, e-mail, number of children.
- Children for whom the staff member requests the direct payment of school fees: name, surname, birthdate, school, school grade and type of school transport used.
- School invoices sent to F4E: include the name and surname of the children, the cycle of education and grade of their academic year, their use (or not) of the school bus and the name of the school they are enrolled in.
- Reimbursement requests for school transportation costs include (apart from the data already

mentioned): the invoice of the bus company or the public transport tickets, the staff's proof of payment, such as a bank statement (including the bank details, such as account number, bank's name and office's address) or any other piece of evidence of the expense.

(b) Sensitive personal data (Article 10)

Not applicable

7) Recipient(s) of the data (Article 31.1 (d))- Who has access to the personal data?

Recipients are all people to whom the personal data is disclosed ("need to know principle"). Not necessary to mention entities that may have access in the course of a particular investigation (e.g. OLAF, Court, EDPS).

The following recipients have access to the personal data processed:

- Process owner: Head of Human Resources Unit
- Dedicated staff of the Human Resources Unit dealing with the schooling requests
- Head of Administration Department
- F4E Director
- Another person internally may be consulted if deemed necessary by the Appointing Authority for a specified case
- ICT Officer if necessary for technical support
- IDM Manager, if necessary for support
- Dedicated PMO staff

Also, only if appropriate and necessary for monitoring or inspection tasks, access may be given to: e.g. DPO and Anti-Fraud & Ethics Officer, Head or responsible officer of LSU, IAC, IDOC.

8) Transfers to third countries or International Organizations (Article 31.1 (e))

If the personal data is transferred outside the EU, this needs to be specifically mentioned, since it increases the risks of the processing operation (Article 47 ff.).

Data is transferred to third countries or International Organizations recipients:

Yes.....

No

If yes, specify to which country/IO:

If yes, specify under which safeguards and add reference :

- Adequacy Decision (from the Commission)
- Memorandum of Understanding between public authorities/bodies
- Standard Data Protection Clauses (from the EDPS/Commission).....
- Binding Corporate Rules
- Others, e.g. contractual/agreements (subject to authorisation by the EDPS).....

Reference: Not applicable

9) Technical and organisational security measures (Articles 31.1(g) and 33)

Please specify where the data is stored (paperwise and/or electronically) during and after the processing. Specify how it is protected ensuring “confidentiality, integrity and availability”. State in particular the “level of security ensured, appropriate to the risk”.

- Security measures are implemented to ensure integrity, confidentiality and availability of information. The default provisions include backups, centralized logging, software updates and continuous vulnerability assessment and follow-up. Specific provisions resulting from the characteristics of the information system may lead into the implementation of encryption, two factor authentication among others found relevant following a risk analysis.

10) Retention time (Article 4(e))

How long is it necessary to retain the data and what is the justification for this retention period? If appropriate, differentiate between the categories of personal data. If the retention period is unknown, please indicate the criteria for determining it.

- Personal Data related to the children enrolled in the schooling scheme as well as the staff member to whom they relate to, shall be retained for seven years from the end of the school year to which the documents relate to, in accordance with the retention period established for administrative contract management files in the F4E Specific Retention List (IDM ref: F4E_D_24BUD4).
- Personal Data related to the administrative payments, such as invoices and reimbursements (administrative expenditure) shall be retained seven years after the end of the discharge of the financial year to which they are linked, as established in the dedicated contract management record (F4E_D_2GBTAX).
- Fusion for Energy may continue to store Personal Data for a longer period, as may be necessary for internal auditing and for the establishment, exercise or defense of legal claims until such claims are finally resolved

11) Information/Transparency (Article 14-15)

Information shall be given in a concise, transparent and easily accessible form, using clear and plain language.

A Specific Privacy Notice on Direct Payment Scheme ('Schooling'): Payment of School Fees and School Transport Costs has been established (F4E_D_2MLCJ3) and published on the F4ENet in the respective HR section and in the [Data Protection Register](#), providing the information required under Articles 15 and 16 of the 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2001/EC.*

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