

**RECORD OF PROCESSING ACTIVITY
ACCORDING TO ARTICLE 31 REGULATION 2018/1725¹
NOTIFICATION TO THE DATA PROTECTION OFFICER**

NAME OF PROCESSING OPERATION²: Survey on violence and related human rights abuses against women fleeing the war in Ukraine

Reference number: DPR-2023-198
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Part 1 (Publicly available)

1) Controller(s)³ of data processing operation (Article 31.1(a))
<p>Controller: European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria Telephone: +43 1 580 30 – 0 Email: contact@fra.europa.eu Organisational unit responsible⁴ for the processing activity: Justice, Digital and Migration Unit Contact details: statisticssurveys@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu</p>

2) Who is actually conducting the processing? (Article 31.1(a))⁵
<p>The data is processed by the FRA itself <input checked="" type="checkbox"/></p> <p>The data is processed also by a third party: <input checked="" type="checkbox"/></p>

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

² **Personal data** is any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, a picture, professional details, etc.

Processing means any operation or set of operations which is performed on personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

³ In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

⁴ This is the unit that decides that the processing takes place and why.

⁵ Is the FRA itself conducting the processing? Or has a provider been contracted?

- Processor: Ipsos NV (contractor)
Contact (DPO): (DPO.Belgium@ipsos.com)
The processor (FRA's contractor) was selected following an EU public procurement procedure.
- Sub-processor (subcontractor) – Czechia: MindBridge Consulting
Contact (DPO): (kravka@mindbridge.cz)
- Sub-processor (subcontractor) – Germany: Ipsos Germany
Contact (DPO): (dpo.germany@ipsos.com)
- Sub-processor (subcontractor) – Poland: Ipsos Poland
Contact (DPO): (nina.gaworska@ipsos.com)
- Sub-processor: Novatel EOOD Bulgaria, which hosts the survey fieldwork tool iField

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

Why are the personal data being processed? Please provide a very concise description of what you intend to achieve with the processing operation. Specify the rationale and underlying reason for the processing and describe the individual steps used for the processing. If you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).

The survey on violence and related human rights abuses against women fleeing the war in Ukraine implements the data collection activities of the project B.3.6 'Violence and related human rights abuses against women fleeing the war in Ukraine', included in FRA's Single Programming Document 2023-2025.

The purpose of the project is to collect comparable data on women's experiences of violence and other human rights abuses in the context of an armed conflict. The survey builds upon FRA's 2012 survey on violence against women as well as OSCE's 2018 survey on the same topic (replicating the FRA survey) in eight countries and territories outside the EU. The survey also references the Violence against women survey II, which FRA is currently implementing in eight countries jointly with EIGE, and which uses the methodology developed by Eurostat to collect data on gender-based violence against women and other related forms of interpersonal violence.

The project will interview women (ages 18-74 years) who were living in Ukraine when Russia's war of aggression in Ukraine started on 24 February 2022, and who have since arrived in the EU – specifically, one of the three countries where the data collection will take place: Czechia, Germany and Poland. These countries have been selected as they are among the EU Member States hosting the largest number of people arriving from Ukraine since the start of the war. The project involves data collection in the form of a structured, quantitative survey and qualitative in-depth interviews. The survey will interview 400 women in each of the three survey countries (that is, 1,200 interviews in total) while 10 in-depth interviews will take place in each country (30 in-depth interviews in total).

Both the survey and the in-depth interviews contain questions about women's experiences in Ukraine, during their journey on the way from Ukraine to the EU, and

events that have taken place in their current country of residence (Czechia, Germany or Poland). The interviews will ask about women's experience related to the conflict such as risk to their safety as well as experiences of physical or sexual violence, psychological violence and harassment. Interviewees will also be asked to answer questions concerning their socio-demographic characteristics, to carry out a disaggregated analysis of the results.

Respondents' answers to the survey will be stored and analysed anonymously. The project will process personal data for the purpose of organising the survey data collection and the in-depth interviews. The survey includes two data collection activities – the pilot and the mainstage survey – while the in-depth interviews will take place as one activity. In each data collection activity, the personal data that will be processed will include names, addresses, telephone numbers and email addresses that will be used to contact the people selected to be interviewed, schedule the interviews and, after the interviews, to administer the survey incentives (if necessary) and perform any necessary quality control checks. The pilot interviews and in-depth interviews will be voice recorded subject to respondents' consent. Ipsos NV will destroy their copy of the recordings (including consent forms, which are stored separately) when they are no longer necessary for quality assurance purposes, once Ipsos NV has met their contractual obligations. FRA will destroy its copy of the recordings (including consent forms, which are stored separately) when they are no longer necessary for quality assurance of the project's research outputs, at the latest after two years from the date of the last recording.

The personal data that is necessary to organise and carry out the interviews will be kept only as long as it is necessary to carry out the data collection and quality control activities, and they will be destroyed once Ipsos NV has met their contractual obligations. After this point only anonymised survey data will be kept, as well as anonymised descriptions of the in-depth interviews. Interview data (such as responses to the survey questions) which doesn't contain any personal details will be stored indefinitely for research purposes.

Survey respondents will be selected using location sampling. This involves interviewers approaching potential respondents in various locations, introducing the survey and determining whether the person would be eligible to take part in the interview. The interviews will be carried out either immediately or interviewers write down the persons contact details in order to be able to organise the interview at a later time. To select participants for the in-depth interviews, Ipsos NV and its subcontractors will contact selected organisations which provide services to women from Ukraine and ask them to either provide the contact details of persons who could be considered for an interview or have the organisations inform potential respondents and contact the interviewing team to agree a place and time for the interview. All interviews will take place in-person. In the survey, the interview will include interviewer-administered and self-administered sections. Self-administration involves the respondent entering their answers to a tablet or a laptop provided by the interviewer, and it provides an additional level of privacy since the interviewer will not have knowledge of respondents' answers to the self-administered questions.

In both cases (survey interviews and in-depth interviews), respondents will be provided with a description of the project as well as information about their data protection and privacy rights before the interview. Taking part in the interviews is voluntary, interviewees can decide to terminate the interview at any time, or they can decline to answer specific questions. However, in order to confirm women's eligibility to take part in the interviews, it is necessary to collect their age (or age group) and ask them to confirm that they were living in Ukraine before the start of the Russian war of aggression on 24 February 2022 (however, women can also choose to not participate at all and not to give any information). Before the beginning of the survey, respondents will be asked to confirm that they are willing to start the interview. Participants of the pilot and in-depth interviews will also be asked to sign a consent form for the audio recording of the interview. Ipsos

NV will provide FRA with a copy of the signed consent forms from in-depth interview participants, and FRA will store these securely on its premises.

After completing the interview, respondents may be offered a small incentive as a ‘thank you’ for taking the time to answer the questions. The incentive will be delivered either immediately after the interview or they will be sent to their address. Interviewees can also refuse the incentive in which case their contact information will not be needed for the purposes of delivering it.

4) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are being processed?

- FRA staff
- Non-FRA staff

Data subjects are people contacted by the contractor to participate in survey interviews and in-depth interviews – that is, women aged 18-74 years who were living in Ukraine before 24 February 2022 and who now reside in one of the survey countries (Czechia, Germany or Poland).

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

Please tick all that apply and give details where appropriate

(a) General personal data

Personal details - name, surname, gender, address to contact respondents for the survey, nationality

Contact details - postal address, telephone number, email address to contact interviewees for and to send the incentives after interview (if the incentive hasn't been provided immediately after the end of the interview)

Education & Training details: closed-ended survey questions on highest completed level of education

Employment details: closed-ended survey questions on employment status, occupation

Financial details

Family, lifestyle and social circumstances: closed-ended survey questions on household size and composition, and respondent's current partner and any previous partners

Goods or services provided	<input type="checkbox"/>
Other (please give details):	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • Metadata and Paradata: for the management and assessment of the data collection, the survey will collect anonymous metadata and paradata such as interview time and length. 	
(b) Special categories of personal data (Article 10)	
The personal data collected reveal:	
Racial or ethnic origin: closed-ended, voluntary survey question on self-identified ethnicity	<input checked="" type="checkbox"/>
Political opinions	<input type="checkbox"/>
Religious or philosophical beliefs: closed-ended, voluntary survey question on religion or beliefs	<input checked="" type="checkbox"/>
Trade union membership	<input type="checkbox"/>
Genetic, biometric or data concerning health: closed-ended, voluntary survey questions on overall health status, activity limitations, injuries and psychological health consequences of violent incidents, and use of health care services	<input checked="" type="checkbox"/>
Information regarding an individual's sex life or sexual orientation: closed-ended, voluntary survey questions on experiences of sexual violence; voluntary question on self-identified sexual orientation and gender identity when recruiting participants for in-depth interviews, to ensure that the experiences of women from these groups are represented, as well as voluntary questions on the impact of one's sexual orientation and gender identity to their other experiences, as asked about in the interviews	<input checked="" type="checkbox"/>
N/A	<input type="checkbox"/>
(c) Personal data relating to criminal convictions and offences (Article 11)	
Criminal record (or similar, e.g. declaration of good conduct)	<input type="checkbox"/>
N/A	<input type="checkbox"/>

6) Recipient(s) of the data (Article 31.1 (d))

*Recipients are all parties who have access to the personal data. Who will have access to the data **within** FRA? Who will have access to the data **outside** FRA? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).*

Designated **FRA** staff members

Survey data collection activities will be managed by the survey contractor, Ipsos NV. During the survey data collection process, it is not foreseen for FRA to receive personal data, and after the end of the data collection the contractor transmits to FRA the anonymous survey data.

However, as data controller, FRA may request access to the personal data processed by the contractor on its behalf. In that case, a restricted number of FRA staff will have access to the collected personal data.

Recipients **outside** FRA: Ipsos NV and its sub-processors

Therefore, the personal data that is necessary for conducting the interviews will only be accessed by a limited number of people – specifically, the interviewers and a restricted number of Ipsos NV staff and its sub-processors (acting both on behalf of FRA), who are involved in the management of the data collection activities. Respondents' personal data will be stored separately from their answers in the interview, which will be treated anonymously. The processor and the sub-processors (Ipsos' local agencies and other subcontractors of Ipsos NV) will process the personal data that is necessary to organise the interviews and – where necessary – send the survey incentives to interviewees after the interviews. This includes information such as names, addresses, telephone numbers and email addresses. Ipsos NV will also process the voice recordings and consent forms of the in-depth interview participants.

7) Transfers to third countries or international organisations (Article 31.1 (e))⁶

If the personal data are transferred outside the European Economic Area or to international organisations, this needs to be specifically mentioned, since it increases the risks of the processing operation.

Transfer outside of the EU or EEA

Yes

No

Some members of Ipsos NV staff who are involved in the management of the data collection are based in the UK and will have access to respondents' personal data in order to manage the data collection activities (survey and interviews). This processing is lawful under the EU-UK adequacy decision.

⁶ **Processor** in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult your DPO for more information on how to ensure safeguards.

Anonymous collected data will be made available for research purposes with interested researchers as indicated above, including those operating in third countries and international organisations.

If yes, specify to which country: United Kingdom.

Transfer to international organisation(s)

Yes

No

Anonymous survey data might be shared with researchers, including those working for international organisations

If yes specify to which organisation:

Legal base for the data transfer

Transfer on the basis of the [European Commission's adequacy decision](#) (Article 47)

Transfer subject to appropriate safeguards (Article 48.2 and .3), specify:

a) A legally binding and enforceable instrument between public authorities or bodies.

Standard data protection clauses, adopted by

b) the Commission, or

c) the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .

d) Binding corporate rules, Codes of conduct , Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.

Subject to the authorisation from the European Data Protection Supervisor:

Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.

Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.

Transfer based on an international agreement (Article 49), specify:

Derogations for specific situations (Article 50.1 (a) –(g))

N /A

Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

(a) The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards

- (b) The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request
- (c) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person
- (d) The transfer is necessary for important reasons of public interest
- (e) The transfer is necessary for the establishment, exercise or defense of legal claims
- (f) The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent
- (g) The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

8) Retention time (Article 4(e))

How long will the data be retained and what is the justification for the retention period? Please indicate the starting point and differentiate between categories of persons or data where needed (e.g. in selection procedures candidates who made it onto the reserve list vs. those who didn't). Are the data limited according to the adage "as long as necessary, as short as possible"?

Personal data used to carry out the interviews (names, addresses, telephone numbers, email addresses) will be destroyed after the end of the data collection activities and quality control measures, at the latest six months after the end of FRA's contract with Ipsos NV on 16 April 2024. Anonymous interview data will be kept indefinitely for research purposes.

Should selected parts of the interview be monitored/audio recorded for quality control purposes, Ipsos NV will destroy their copy of the recordings (including consent forms, which are stored separately) when they are no longer necessary for quality assurance purposes, once Ipsos NV has met their contractual obligations. FRA will destroy its copy of the recordings (including consent forms, which are stored separately) when they are no longer necessary for quality assurance of the project's research outputs, at the latest after two years from the date of the last recording. Anonymous survey data and anonymised descriptions of the in-depth interviews and pilot interviews will be retained indefinitely for research purposes.

9) Technical and organisational security measures (Article 31.1(g))

Please specify where/how the data are stored during and after the processing; please describe the security measures taken by FRA or by the contractor

How is the data stored?

- Document Management System (DMS)
- FRA network shared drive

Personal data necessary for implementing the survey data collection (such as names, addresses, telephone numbers and email addresses) will be handled by the survey contractor and it is not foreseen that these data are transmitted to FRA, and FRA will only receive anonymous survey data. However, should it become necessary for FRA as the data controller to request the contractor (data processor) to transmit any personal data to FRA, these data would be stored on FRA's network, on shared drive Q, with access limited to only nominated FRA staff. Anonymous survey data will also be stored on the shared network drive (Q drive). Voice recordings and consent forms from the in-depth interviews will be stored in FRA's network drive, password-protected and processed by designated FRA staff members only.

- | | |
|--|-------------------------------------|
| Outlook Folder(s) | <input type="checkbox"/> |
| CRM | <input type="checkbox"/> |
| Hardcopy file | <input type="checkbox"/> |
| Cloud (FRA's cloud service provider for DMS) | <input checked="" type="checkbox"/> |
| Servers of external provider | <input checked="" type="checkbox"/> |
| Other (please specify): | |
| Data collected through Ipsos' iField platform is hosted on Novatel EOOD provided by Equinix in Bulgaria. | |

10) Exercising the rights of the data subject (Article 14 (2))

How can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? How will you react?

People exercise their rights by sending an e-mail to statisticssurveys@fra.europa.eu. See further details in the Data Protection notice. Data subjects can exercise the rights listed below up until their personal data has been destroyed. After this, only anonymous interview data remains, and it will not be possible to identify data subjects from the survey data set.

The following rights concern subjects' personal data collected and processed as a part of conducting the interviews (general personal data). After this personal data has been deleted, leaving only anonymous research data, respondents' responses can no longer be identified, meaning that it will not be possible to – for example – access or delete the personal data provided by the subject.

Data subject rights

- Right of access
- Right to rectification
- Right to erasure (right to be forgotten)

- Right to restriction of processing
- Right to data portability
- Right to object
- Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Right to have recourse
- Right to withdraw consent at any time