

360° FEEDBACK EXERCISE

Key information

Controller

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Process owner

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Data protection officer

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Purpose of the processing

The purpose of the processing is to provide feedback to all managers and team leaders on their managerial performance and behaviour.

Feedback are given by their manager, their peers and the colleagues reporting directly to them. Heads of Department, who have Heads of Unit / Team leaders under their responsibility, will also receive feedback from a sample of the staff members reporting to the latter.

Feedback are provided via an on-line questionnaire managed by the contractor. All but two questions are rating scale replies. The final two questions are open.

The on-line tool uses an anonymity mechanism – which means that the feedback and replies given cannot be linked to the name of the respondent.

The contractor can only know whether the respondent is the manager of the manager/team leader, a peer, or a colleague reporting (directly / indirectly) to the manager/team leader.

The outcomes are presented in an individual report, in which the individual feedbacks are automatically aggregated, and complemented by the anonymous replies to the two open questions.

Where necessary, the contractor may edit the replies to the open questions to cancel any name or identifier which might appear, to make them anonymous.

The outcomes reported in the individual report are debriefed individually with the consultant.

The individual report (paper copy) is given to the manager / team leader, his / her manager and the Director. No other paper / electronic copy is given to the ETF or any of its staff members.

The outcomes of the exercise will be considered in the current yearly performance management exercise.

In addition to the individual reports, the contractor will prepare:

- a report for the attention of the Director, giving the overall picture of managers and team leaders.
- a report for the attention of the Head of Department to whom more than one Head of Unit / team leader report to, giving the overall picture of for those.

A paper copy of those reports is provided to the HR Unit.

The **Director** will also receive feedback. They will be given by the managers reporting directly and indirectly to him and by the staff working under his management.

The Director will receive a paper copy of his own individual report.

Legal basis

- ETF Governing Board Decision ref. GB/18/DEC/014 – implementing rules on middle management staff
- ETF Governing Board Decision ref. GB/15/DEC/008 - Implementing articles 43 and 44 of the SR for temporary staff
- Minutes of the Management Team meeting of 28 January 2019 adopting the follow up to the staff engagement survey, presented to all staff on 1 February 2019

Personal data

Personal data concerned are:

- For the managers / team leaders who receive feedback:
Name, e-mail and the feedback they receive on their performance and behaviour

- For the staff members giving feedback:

Name, email and feedback given

Recipients of the personal data

For the purpose detailed above, access to personal data is provided to the following processing entities:

- Internal recipients:
 - Managers / team leaders receiving feedback -> individual reports
 - Their manager -> individual reports of the managers / team leaders under their responsibility and, if applicable, overall report for their department
 - The Director -> individual reports of all managers / team leaders and overall report for all managers / team leaders
 - The HR Unit -> both types of overall reports
- External recipients:
 - The contractor entrusted with the organisation and performance of the exercise

Transfer to third countries/international organisations

Not applicable

Further information

Data retention

The individual feedbacks are destroyed by the contractor once the reports are produced. The reports are destroyed by the contractor once they are given to the relevant managers / HR Unit at the ETF.

The individual reports are retained for a period of two calendar years following the year in which they are distributed to the respective manager and Director after which they are destroyed by them.

The overall reports are retained for a period of four calendar years following the year in which they are distributed, for comparison purposes in case the exercise is repeated.

Right of access, rectification or erasure, restriction, objection

Any request to access, rectify or erase personal data, or to restrict or object to the processing of personal data shall be addressed in writing to the Head of Human Resources Unit, npe@etf.europa.eu.

Right to withdraw consent

Not applicable

Right to lodge complaint

Data subjects can at any time lodge a complaint on the processing of their personal data to the ETF Data Protection Officer ([DataProtectionOfficer@etf.europa.eu](mailto>DataProtectionOfficer@etf.europa.eu)) or to the European Data Protection Supervisor (<http://www.edps.europa.eu>).

Necessity of provision of data

The provision of personal data of managers / team leaders who receive feedback is necessary in view of identifying them in the exercise. .

Giving feedback is done on a voluntary basis.

The provision of personal data of the persons giving feedback is necessary for the sending of the invitation to reply to the questionnaire (name and email), and for the matching with the manager / team leader.

Further processing

The outcomes reported in the individual report will be considered in the current performance management report.