Privacy statement in the framework of training activities organised by the European School of Administration ("the School") and the use of the Performanse® Self-Perception Questionnaire

This statement explains how all personal data provided are dealt with in the framework of regulation (EC) N° 45/2001 of the European Parliament and of the Council of 18 December 2000. It is submitted individually to staff of the EU institutions, offices and agencies who participate in training courses organised by the School and who choose voluntarily to seek feedback on their behavioural tendencies and motivations in their working environment.

In accordance with articles 11 and 12 of this regulation, EPSO and the School provide the participants in this activity with the following information:

Controller identity¹: Mr Nicholas David BEARFIELD, Director of EPSO.

<u>Purpose(s)</u> of the <u>processing</u>: to allow participants in the School training courses to obtain feedback on their behavioural tendencies and motivations in their working environment. The data will not be used in any form of evaluation (appraisal) process of any of the persons involved.

<u>Data concerned</u>: Data concern those staff of the EU institutions, offices and agencies participating in the training courses organised by the School. Data requested from the staff participating in the training courses is collected on a purely voluntary basis.

Course participants are offered the opportunity to use a feedback tool in the form of a self-assessment. Participation in this activity by the person concerned is entirely voluntary and participants are free to choose whether or not to take part in this activity. It is a facility offered by the School to help participants learn more about themselves and enhance their own personal development in a professional context.

The respondent answers 70 pairs of "forced choice" propositions. These items are exclusively associated with the professional sphere and measure behavioural tendencies and main motivation levers. The results are then complied automatically and two feedback reports are generated (PERF ECHO© and PERF MANAGER©)

¹ By reason of the administrative attachment of the School to the EPSO, the Director of EPSO is responsible for control.

The PERF ECHO© report is composed of 3 parts:

- 1) A text describing the respondent's behavioural tendencies divided into 6 chapters
 - a. General overview
 - b. Relationship to work (activities, work paces, thought processes...)
 - c. Relationship to others (sociability)
 - d. Relationship to hierarchy
 - e. Reactions to stress
 - f. Ideal working environment
- 2) A list of supporting/warning factors which indicates the respondent's behavioural strengths and possible areas of improvement
- 3) Graphs showing the respondent's scores on 20 personality traits.

The PERF MANAGER© report shows charts giving the respondent's position, comfort and effort zones, on 12 behavioural skills divided into 4 fields:

- 1) Change Management (Managing complexity, Developing a vision, Implementing change)
- 2) Organisational Management (Determining Parameters, Implementation, Following through)
- 3) Team Management (Team deployment, Effective communication, Rewarding and disciplining)
- 4) Personal Resources (Staying Power, Tolerance, Consistency)

A description is given of each one of the skills being measured.

The individual reports are accessible by using a personal password created by each participant.

Participation is entirely optional. All data are processed solely for the benefit of, and for the purpose of providing feedback to, course participants. Data provided will be deleted within 90 days after the questionnaire completion. All data are processed by subcontractors and neither the School nor any staff within the institutions, offices or agencies of the course participants will have any access to the data contained in the feedback reports.

The processing of data is as follows.

1. The course participant is given full information about the activity and invited to choose whether or not to participate. If they so choose, they must provide details (name and electronic address) about themselves. These details are provided at present to Performanse, sub-contracted to one of the School's training providers to provide this service. Any change in or addition to the company providing this service will result in an

update of the privacy statement. This data serves purely to identify the course participant in the exercise and to allow the sub-contractor to contact them. The course participant is provided at this stage with full information about the exercise and the nature and steps of data processing.

- 2. The course participant provides input to the activity. This data takes the form of filling in an on-line questionnaire. The data collected take the form of numerical data only.
- 3. Performanse on-line system processes the data supplied by the participant. The numerical data is amalgamated into two reports, namely PERF ECHO and PERF MANAGER
- 4. This is done automatically. The reports thus generated are then available to the participants through a password that they have created themselves.
- 5. If the participant so wishes, his/her reports are communicated to a member of the School's subcontractor in order to receive oral feedback by telephone. This feedback is only available for 15 calendar days after the participant has completed the questionnaire.
- 6. On the fourth day of the training programme, which is generally scheduled three to four months after the third day, the participant should bring his/her report as time will be given that day for discussion as to how he/she can interpret their results, how they tie in with the task-team-results model he/she examined during the first three days of the course, and what priority developmental needs the participant has for the future.

Nature of the data to be processed:

- Data of a personal nature allowing the identification of the staff member concerned (name, given name, electronic address, password) and feedback reports;
- Information provided by the course participant in the following areas, showing their comfort and effort zones:
 - 1) Change Management (Managing complexity, Developing a vision, Implementing change)
 - 2) Organisational Management (Determining Parameters, Implementation, Following through)
 - 3) Team Management (Team deployment, Effective communication, Rewarding and disciplining)
 - 4) Personal Resources (Staying Power, Tolerance, Consistency)

Legal base:

- conditions of employment of servants of the European Communities, as fixed by regulation (CEE, Euratom, CECA) n° 259/68 of the Council, last modified by regulation (CE, CECA, Euratom) n° 23/2005 of the Council, and in particular articles 45b of the Staff Regulations and 7 § 2 point c) of Annex III of the Staff Regulations;

- decision n° 2002/620/CE of the European Parliament, the Council, the European Commission, the Court of Justice, the Court of Auditors, the European Economic and Social Committee, the Committee of the Regions and the European Ombudsman of 25 July 2002 culminating in the creation of the European Personal Selection Office;
- decision n° 2005/118/CE of the European Parliament, the Council, the European Commission, the Court of Justice, the Court of Auditors, the European Economic and Social Committee, the Committee of the Regions and the European Ombudsman of 26 January 2005 culminating in the creation of the European Administrative School;
- decision n° 2005/119/CE of the Secretaries General of the European Parliament, the Council, the European Commission, the Court of Justice, the Court of Auditors, the European Economic and Social Committee, the Committee of the Regions and the European Ombudsman of 26 January 2005 concerning the organisation and operation of the European Administrative School;

Recipients of the data: the sub-contractor of the School who receives and processes the data; the course participant him/herself who receives the amalgamated reports of the feedback. No data (except a presence list signed by the participants who completed the questionnaire and received the oral feedback) is received by the School or any of the EU institutions, offices or agencies.

<u>Lawfulness of processing</u>: the processing is useful in helping staff of the EU institutions, offices and agencies to fulfil their management functions carried out in the public interest on the basis of legal instruments adopted on the basis of the treaties establishing the European Communities.

<u>Date when processing starts</u>: date of receipt by the contractor of the School of the data identifying the course participant.

<u>Data retention period</u>: data concerning the identity of the course participant is kept for a period not exceeding **90 days** from the date of the questionnaire completion.

Right of access and verification: staff members concerned may send a request to indicate any changes to their personal data. In any case, and following written request with a copy of a proof of identity, they may obtain a copy of their personal data as registered by the contractor of the School. Requests can be sent to: **epso-eusa-pdp@ec.europa.eu**. The contractor has been informed of this right of access and accepted to handle requests sent by participants and or the School.

Following a written request with a copy of a proof of identity, participants may obtain a written copy of all the information which they provided in the form of feedback to allow them to check that the information they supplied was accurately recorded. The proof of identity will not be kept longer than the above-mentioned data retention period.

This entails any right of rectification under article 14 of regulation (EC) N° 45/2001 of the European Parliament and of the Council of 18 December 2000

Staff also have the right to have recourse at any time to the European Data Protection Supervisor (edps@edps.europa.eu).