Opinion on a notification for Prior Checking received from the Data Protection Officer of the Committee of the Regions regarding the "360° feedback survey for managers"

Brussels, 20 December 2011 (Case 2011-0926)

1. Proceedings

On 13 October 2011, the European Data Protection Supervisor (**EDPS**) received a notification for prior checking relating to the processing of personal data in the context of the "360° feedback survey for managers" from the Data Protection Officer (**DPO**) of the Committee of the Regions (**CoR**).

Questions were raised on 21 October 2011 to which the DPO of the CoR replied on 27 October 2011. The draft Opinion was sent to the DPO for comments on 12 December 2012. The EDPS received a reply on 16 December 2011.

2. The facts

"360° feedback survey for managers" constitutes a human resources tool aiming to help participating managers to learn about their professional and managerial skills and enhance their own personal development.

Its **purpose** is to allow managers to receive feedback from various sources concerning their strengths and weaknesses in a wide range of competency areas (task, process, quality and information management), on the basis of a survey sent and completed by themselves, as well as by a statistically representative sample of contributors (staff, peers, superiors). As a professional development tool, it is formally distinct and disconnected from the managers' appraisal procedure.

The **data subjects** concerned are, on the one hand, the "reviewees" (Heads of Unit, Directors and Deputy Directors) and, on the other hand, the "contributors": employees assigned to a reviewee's services (staff), other members of the management or other contributors external to the Directorate and/or the CoR with which the manager concerned has regular non-hierarchical contact as part of his/her duties (peers) as well as supervisor(s) of the manager concerned (superiors). According to the notification, participation in this exercise by both, reviewees and contributors, is entirely voluntary and no consequences derive from either participating or not participating.

According to the notification, the **legal basis** of the exercise will be a Policy Paper on "360 Degree Feedback" (Policy Paper) to be adopted by the Appointing Authority of the CoR.

The first step of the **procedure** is a call for expressions of interest sent to the managers of the reviewee category referred to in the call. A person specifically designated within Directorate

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A to organize the particular 360° feedback exercise, the so-called Feedback Coordinator (FC), is in charge of sending and receiving surveys via e-mail; the assessment of professional and managerial skills is based on questionnaires comprising several sections corresponding to a series of key management competencies.

- Managers participating in the exercise are contacted by the FC and are invited to complete a self-assessment survey within 10 working days.
- A statistically relevant sample of potential contributors is established among the following population: (1) all staff hierarchically dependent on the manager concerned and/or with a direct working relationship with the latter, (2) all of his/her hierarchical superiors and, for the (3) category of peers, all other managers from the same or other Directorate, as well as any additional relevant contributors external to the Directorate and/or the CoR proposed by the reviewee. The FC sends the survey to these potential contributors and invites them to complete it within 10 working days.

The data collected through the surveys are copied and stored anonymously by the FC in an Excel database, which contains no reference to the identity of the respective contributors, but only to their category (staff, peers, superiors) as well as the name of the reviewee. The database is sent to an external consultant for analysis, the preparation of the feedback report and the organization of face to face debriefing sessions with the reviewee. The feedback report is based on the results of the surveys and reflects the most significant findings, either in absolute terms (global scores) or in relative terms (comparing the scores in the different categories of contributors with one another and/or with the scores given by the manager during the self-evaluation). The feedback report also contains the arithmetic averages for each topic area and for each statement within a topic area.

The results of the 360° exercise are known only to the reviewee and to the external consultant, not to any other persons and/or services within the CoR or outside. However, the reviewee is to discuss the overall outcome of the 360 degree feedback survey with his superior and it is recommended that he/she share the main conclusions of the survey with his/her staff and/or with other stakeholders. He is further invited to contact the Vocational Training Department regarding "possible means to give adequate follow-up to the lessons drawn from the 360 degree feedback exercise".

The **primary responsible person** for the data processing within the controller (CoR) is the Head of Unit A3 of Directorate A (Administration and Finance). The CoR will outsource to a **processor**, an external consultant, the task of analysing and reporting on the raw data (all data stemming from the feedback, but without any reference to the identity of the respective contributors). Before the exercise, a confidentiality convention will be signed between controller and processor, stating that the latter will act only upon instruction of the controller and recalling his/her obligations regarding confidentiality and security of personal data.

The **data/categories of data processed** encompass the name, first name, position (allocation to Unit/Directorate, position in structural chart, closeness of professional contacts with the reviewee) and e-mail address of the reviewee; the name, first name, position category (staff, peer and/or superior) and e-mail address of the contributors; the replies to the survey given by the reviewee (self-assessment) as well as the contributors in the form of scores attributed to different statements contained in a questionnaire and/or open comments or suggestions regarding the managerial skills of the reviewee provided via in free text fields in the questionnaire.
Where a data subject exercises the rights of access, rectification, blocking and erasure of data, the FC creates a list for personal use in which each respondent has a numerical code, which is stored in the Excel database together with the data subject's survey input. The code is produced automatically when the survey is saved in the FC's personal folder and allows the

FC to follow-up to requests for access, rectification, blocking or erasure without affecting any other data reflected in the database.

As regards the **conservation of the data**, the CoR intents to:

- retain the *electronic files containing the completed surveys* for the duration of the procedure and to destroy (erase from the database) the electronic files six months after the feedback report regarding the manager concerned has been elaborated and transmitted by the external consultant (in order to allow the external consultant to verify his analysis whenever the jobholder contests the reliability of one of the conclusions drawn in his feedback report);
- retain a *paper copy of the feedback report* in a sealed envelope kept in a folder by the FC, which contains all envelopes for that year's exercise to allow the reviewees to access their report in case of loss or damage of the original. The sealed envelope will be destroyed once the next 360° exercise regarding the same reviewee is completed. In any event, the envelope's retention period does not exceed ten years, as the contents of the folder containing the remaining envelopes will be destroyed after ten years;
- retain for "historical and statistical purposes" until the end of the reviewee's career his/her *name and the number of contributions received* within each category of contributors (staff, peers, superiors).

As noted in the Privacy Statement, the data subjects can exercise the **right of access and rectification** by sending a respective request to the FC or the Head of Unit of Unit A3.

As regards **information given to data subjects**, the CoR provides reviewees and contributors with a Privacy Statement published on the intranet site dedicated to the exercise and a reminder of its main elements is part of an introductory section attached to the questionnaire. It contains the following information:

- participation in the exercise for both the manager and the respondents is voluntary and no consequences derive from either participating or not participating;
- processing of personal data happens in compliance with Regulation (EC) 45/2001;
- The data collected are necessary and/or relevant to ensure the objectives of the procedure and will only be used for that purpose;
- confidentiality is guaranteed throughout the exercise. Only the Feedback Coordinator, who is bound by the statutory obligation of confidentiality, has access to the data;
- data subjects can exercise the rights of verification, blockage, rectification and erasure of their data anytime during the exercise.

Information sessions organized prior to the exercise also refer to the processing of personal data and will inform data subjects about the voluntary character of the participation, confidentiality and security measures taken as regards data protection.

[...]

3. Legal analysis

3.1. Prior checking

Applicability of Regulation No 45/2001 ("the Regulation"): The processing operation notified concerns the evaluation of skills and performance of CoR managers in the context of the "360° feedback survey for managers", which implies a processing of personal data ("*any information relating to an identified or identifiable natural person*") under Article 2(a) of the Regulation. The feedback report provided to the participating manager at the end of the exercise does not reveal the way in which the contributors (staff, peers, superiors) replied to the questionnaire, i.e. the reviewee can not retrace who said what. However, these data an not

be considered "anonymous" because the primary responsible person for the data processing within the CoR, the Feedback Coordinator (FC), has the possibility to link the answers with the contributors who have produced them[1].

The CoR is the data controller of this processing activity because it determines its purpose (as specified under point 2 above) and the means (the use of emails and an Excel database in the context of the procedure outlined above) in the sense of Article 2(d) of the Regulation. The external consultant is not authorised to make any further processing activity beyond what is determined by the CoR and specified in the contract, which includes a confidentiality convention stipulating inter alia that the external contractor acts only upon instruction of the controller. Insofar as the data processing is performed by the external consultant, he/she is data processor on behalf of an Institution, in this case, the CoR, in the exercise of activities which fall within the scope of EU law (Article 3(1) of the Regulation). The processing of the data is mostly done electronically (sending and receiving of surveys via e-mail, Excel database). Therefore, the Regulation (EC) No 45/2001 is applicable.

Grounds for prior checking: According to Article 27(1) of the Regulation, "*processing operations likely to present specific risks to the rights and freedoms of data subjects by virtue of their nature, their scope or their purpose shall be subject to prior checking by the European Data Protection Supervisor*". Article 27(2) of the Regulation contains a list of processing operations that are likely to present such risks, which includes, under Article 27(2)(b) of the Regulation, "*processing operations intended to evaluate personal aspects relating to the data subject, including his ability, efficiency and conduct"*. The purpose of the notified processing operation is the evaluation of skills and performance of CoR managers as regards people management, leadership as well as other, operational management responsibilities. Therefore the use of the "360° feedback survey for managers" tool is subject to prior checking by the EDPS.

Deadline: The notification of the DPO was received on 13 October 2011. According to Article 27(4) of the Regulation, the EDPS Opinion must be delivered within a period of two months. The procedure was suspended for a total of 10 days to require additional information and to allow for comments from the data controller. Consequently, the present Opinion must be delivered no later than on 23 December 2011.

3.2. Lawfulness of the processing

Article 5 of the Regulation stipulates criteria for making processing of personal data lawful. This includes under **Article 5(a) of the Regulation** that the *"processing is necessary for performance of a task carried out in the public interest on the basis of the Treaties establishing the European Communities or other legal instruments adopted on the basis thereof or in the legitimate exercise of official authority vested in the Community institution or body"*. The processing of personal data for performance of tasks carried out in the public interest includes *"the processing necessary for the management and functioning of those institutions and bodies"* (Recital 27 of the Regulation).

According to the notification, the legal basis of the "360° feedback survey for managers" will be a Policy Paper to be adopted by the Appointing Authority of the CoR. Even if the assessment conducted in the context of the "360° feedback survey for managers" tool might be useful, it is not *necessary* for the performance of the task carried out by the CoR in the public interest. This is demonstrated by the fact that participation in this activity is voluntary.

[1] See Recital 26 of Directive 95/46/EC: *"...whereas, to determine whether a person is identifiable, account should be taken of all the means likely reasonably to be used either by the controller or by any other person to identify the said person..."*.

Therefore, in order to be considered lawful, the processing operation under examination has to be based on **Article 5(d) of the Regulation**, which allows for the processing of personal data if *"the data subject has unambiguously given his or her consent"*. The *"data subject's consent"* is defined in Article 2(h) of the Regulation as *"any freely given specific and informed indication of his or her wishes by which the data subject signifies his or her agreement to personal data relating to him or her being processed"*.

In this context, the EDPS wants to draw the attention of the CoR to the position of the Article 29 Data Protection Working Party on the matter of consent in an employment context: the value of consent of the data subject in this context must be assessed with adequate cautiousness[2]. The Article 29 Data Protection Working Party had previously taken the view[3] that "*where consent is required from a worker, and there is a real or potential relevant prejudice that arises from not consenting, the consent is not valid in terms of satisfying either Article 7 or Article 8 [of Directive 95/46/EC] as it is not freely given. If it is not possible for the worker to refuse it is not consent. Consent must at all times be freely given. Thus a worker must be able to withdraw consent without prejudice*".

In the case at hand, as noted by the Policy Paper (p.3), the reviewee as well as the contributors receive -together with the survey- a Privacy Statement, which meets the information requirements stipulated in Article 11 of the Regulation, *inter alia* by referring explicitly to the fact that "*participation in this exercise for both the manager and the respondents is voluntary and no consequences derive from either participating or not participating*".

In the light of the above, the EDPS invites the CoR to additionally ensure that data subjects are at *all* stages of the exercise (including those following the completion of the survey) aware of the voluntary nature of their participation.

3.3. Data Quality

Adequacy, relevance and proportionality: Pursuant to Article 4(1)(c) of the Regulation, personal data must be *"adequate, relevant and non excessive in relation to the purposes for which they are collected and/or further processed"*. The data processing as described in the notification *prima facie* seems to meet these requirements, as it would indeed seem necessary for the purpose of assessing the skills of the reviewee.

In this context, the EDPS notes that according to parts 3(c) and (d) of the Policy Paper, "*when the number of contributions is manifestly insufficient to ensure statistical relevance and /or to guarantee the confidential and anonymous character of the individual contributions, the FC shall be entitled to steer the sending of reminders in such a way as to increase pertinence of the overall contributions received....*" and that "*when the number of contributions remains manifestly insufficient to ensure statistical relevance and/or to guarantee the confidential and anonymous character of the individual contributions, the 360 degree feedback shall be cancelled for the jobholder concerned*". The EDPS further notes that according to part 3(d) of the Policy Paper "*For the same reason, it is not recommended for managers in charge of units with five (5) staff members or less to apply for a 360 degree feedback exercise*".

However, the EDPS would like to highlight that the use of **free text fields** for comments by contributors could lead to the disclosure and processing of data that are excessive in relation to the data processing, such as sensitive data in the sense of Article 10 of the Regulation. The EDPS recommends that the CoR ensure that unnecessary data processing is avoided and that no sensitive data in the sense of Article 10 of the Regulation are processed. In this context, the

[2] Opinion 15/2011 of the Article 29 Data Protection Working Party on the definition of consent pp. 13+ 14, 35, see http://ec.europa.eu/justice/policies/privacy/docs/wpdocs/2011/wp187_en.pdf.

[3] Opinion 8/2001 of the Article 29 Data Protection Working Party on the processing of personal data in the employment context, p. 23, see http://ec.europa.eu/justice/policies/privacy/docs/wpdocs/2001/wp48en.pdf.

EDPS invites the CoR to reconsider the intended use of free text fields or to otherwise ensure that unnecessary data processing is avoided, e.g. by accompanying those free text fields by additional guidance as to the specific purpose of such text fields and the nature of the input expected.

Accuracy: Article 4(1)(d) of the Regulation provides that personal data must be *"accurate and, where necessary, kept up to date"* and that *"every reasonable step must be taken to ensure that data which are inaccurate or incomplete are erased or rectified"*.

An important part of the data processed is provided by the contributors, i.e. persons other than the reviewee. The EDPS notes in this context, that all data subjects can make use of their rights of access and verification to ensure that their personal data processed are accurate (see below point 3.6).

The reviewee will have access to his/her individual feedback report, which will allow him/her to understand the data processed about him/her and to verify their accuracy. It may however be difficult in such case to ensure the accuracy of feedback data provided by contributors, which are by definition of a subjective nature. Under Article 20 of the Regulation, the right of the data subject to access and rectify personal data relating to him/her may be limited in order to protect the rights and freedoms of others - the EDPS recommends in this respect that the CoR implement appropriate measures to prevent a reviewee from obtaining information revealing the identity of the contributors having commented on his/her managerial skills so that he/she cannot exercise any pressure against them, in particular vis-à-vis contributors from the (subordinated) staff category.

- The EDPS notes that, according to the Policy Paper (p. 3), "*...the identity of contributors shall be unknown to the jobholder evaluated, to the evaluator and to other contributors...*" and that "*...the contents of the contributors' individual responses shall be unknown to the jobholder evaluated and to other contributors...*".
- However, given that the FC receives the feedback from the reviewee as well as the contributors and later receives a paper copy of the feedback report in a sealed envelope, he/she is -in principle- in a position to retrace who said what. The EDPS recommends that, for every 360° feedback exercise, the CoR reminds the respective FC of his/her obligation under Article 7(3) of the Regulation to process the personal data only for the purposes for which they were transmitted to him/her and, in addition to his statutory obligation of confidentiality, requests the FC to sign a declaration confirming this (see also point 3.5).

Fairness and lawfulness: Article 4(1)(a) of the Regulation also provides that personal data must be *"processed fairly and lawfully"*. Lawfulness has already been discussed (see above point 3.2) and fairness will be dealt with in relation to information provided to data subjects (see below point 3.7)

3.4. Conservation of data/ Data retention

Under Article 4(1)(e) of the Regulation personal data must be *"kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data were collected or for which they are further processed"*.

The CoR intents to erase the electronic files containing the completed surveys six months after the feedback report regarding the manager concerned has been elaborated and transmitted by the external consultant (in order to allow the external consultant to verify his analysis whenever the jobholder contests the reliability of one of the conclusions drawn in his feedback report). In this light, the EDPS takes note of the retention period established in this regard.

The paper copy of the feedback report held by the Feedback Coordinator in a sealed envelope destroyed only once the next 360° exercise regarding the same reviewee is completed, but in any event, the period of retention of this sealed envelope cannot exceed ten years. This is supposed to allow the jobholder to access the report in case of loss or damage of the original. The EDPS invites the CoR to reconsider this maximum retention period, as over the course of several years, the conclusiveness of a feedback report on the potential to develop certain management skills would seem to diminish significantly - just as the added value of being able retrieve such a report in case of loss or damage.

Regarding the retention of the reviewee's name and the number of contributions received within each category of contributors (staff, peers, superiors) for "historical and statistical purposes" until the end of the reviewee's career, it should be noted that under Article 4(1)(e) of the Regulation, "*...personal data which are to be stored for longer periods for historical, statistical or scientific use should be kept either in anonymous form only or, if that is not possible, only with the identity of the data subjects encrypted. In any event, the data shall not be used for any purpose other than for historical, statistical or scientific purposes*". The EDPS would consequently invite the CoR to specify the "historical and statistical purposes" pursued by retaining the reviewee's name and the number of contributions received until the end of the reviewee's career and, based on this exercise, to determine whether such data can be stored without reference to the reviewee's name. At any rate, the EDPS recommends encrypting the reviewee's name.

3.5. Transfer of data

According to **Article 7 of the Regulation**, personal data shall only be transferred within Community institutions or bodies if the data are necessary for the legitimate performance of the tasks covered by the competence of the recipient. The individual feedback report will be accessible only to the reviewee. There is no reason to believe that any internal transfer goes beyond what is necessary for the legitimate performance of the tasks covered by the given recipients.

In line with Article 7(3) of the Regulation, the recipients of the data should be reminded that they can only process the data for the purposes for which they were transmitted (the development of the reviewee's professional and managerial skills and the enhancement of their own personal development) and not for any other purposes (such as the annual appraisal of the reviewee's performance at work).

As already noted in point 3.3, the EDPS additionally recommends that, for every 360° feedback exercise, the respective FC is invited to sign a declaration that he/she has been reminded of his/her obligation under Article 7(3) of the Regulation.

Moreover, in line with **Article 8 of the Regulation**, personal data shall be transferred to recipients subject to the national law adopted for the implementation of Directive 95/46/EC "*...(b) if the recipient establishes the necessity of having the data transferred and if there is no reason to assume that the data subject's legitimate interests might be prejudiced*".

In the case at hand, the necessity of the data transfer to the external consultant is obvious from the fact that if the personal data is not communicated, he/she is not able to perform his/her tasks as requested by the controller (analysis of the survey results, preparation of the feedback report and organization of face to face debriefing sessions with the reviewee).

As to the legitimate interests of the data subjects, compliance with the data quality principle, as well as with the obligations of the controller and the rights of the data subjects, provided the recommendations as described in the present Opinion are implemented, there is no reason to assume, in principle, that these might be prejudiced. Furthermore, data subjects have given their consent to the processing (see point 3.1). As a consequence, there is no reason to believe that the transfer to the external consultant would affect the data subjects' legitimate interests.

3.6. Right of access and rectification

Article 13 of the Regulation grants the data subject the right of access to personal data being processed and Article 14 of the Regulation provides a right to rectification without delay of inaccurate or incomplete data.

- The EDPS recommends that the CoR establish a procedure for dealing with requests by data subjects for access and/or rectification once the respective data have been transferred to the external consultant, regulating in particular that the external consultant has to inform the CoR of such requests and, as the case might be, whether access has been provided and whether and which data have been rectified.
- As explained above (point 3.3 on accuracy), the reviewee has access to his/her feedback report which may be limited in order to protect the rights and freedoms of others - as outlined in point 3.3 above, in this case it is crucial that appropriate measures are implemented to prevent a reviewee from obtaining information revealing the identity of the contributors.
- Furthermore, as regards the right of rectification, the EDPS points out that given the subjectivity involved in the feedback reports and their intended purpose, the room for rectification is relatively limited. For example, the person concerned providing feedback may later realize that he or she made a factual mistake in the feedback provided. Therefore, a case-by-case analysis is recommended should there be a request for rectification.
- As regards the paper copy of the feedback report held by the FC in a sealed envelope to allow the jobholder to access the report in case of loss or damage of the original, the EDPS invites the CoR to establish the right for the reviewee to verify that the envelope remains sealed and to inform the reviewee accordingly.

3.7. Information to the data subject

Pursuant to Articles 11 and 12 of the Regulation, those who collect personal data are required to inform individuals that their data are being collected and processed unless the data subject already has this information. Individuals are further entitled to be informed of, inter alia, the purposes of the processing, the recipients of the data and their specific rights as data subjects. All data subjects (i.e. reviewees and contributors) are provided with a Privacy Statement containing most pieces of information as required in Articles 11 and 12 of the Regulation. The EDPS recommends that the CoR additionally include the following to ensure that the information is adequate and compliant with the requirements of the Regulation:

- information that participation by data subjects is at *all* stages of the exercise (including those following the completion of the survey) voluntary and regarding the possibility to refuse and/or withdraw their consent without having to fear any negative consequences;
- information on the right of the reviewee to verify that the sealed envelope containing a paper copy of the feedback report, which is held by the FC to allow the jobholder to access the report in case of loss or damage of the original remains sealed.

3.8. Processing data on behalf of controllers

In the present case, the processing activity is partly conducted by a processor, an external contractor, on behalf of the CoR. Article 23 of the Regulation stipulates for such situations inter alia that "*...the controller shall choose a processor providing sufficient guarantees in respect of the technical and organisational security measures required by Article 22 and ensure compliance with those measures*" and that this "*...shall be governed by a contract or*

legal act binding the processor to the controller" stipulating in particular that *"...the processor shall act only on instructions from the controller*".

The EDPS notes that, according to the notification, a confidentiality convention will be signed between the controller and the processor before the exercise, stating that the latter will act only upon instruction of the controller and recalling his/her obligations regarding confidentiality and security of personal data in line with the requirements stipulated in Article 23 of the Regulation.

Whilst the EDPS considers this measure is suitable to ensure that the data are handled by the subcontractor in a satisfactory way, he stresses that, although parts of the processing (the task of analysing and reporting on the raw data) are outsourced to a processor, it is the controller who is responsible for ensuring that the obligations provided for in the Regulation are met (on information to be given to the data subject, ensuring the rights of the person concerned, the choice of processor, security and confidentiality of data, etc.).

[...]

Conclusion:

There is no reason to believe that there is a breach of the provisions of Regulation (EC) N° 45/2001 providing the following considerations are fully taken into account. The CoR must:

- ensure that all data subjects are at *all* stages of the exercise (including those following the completion of the survey) aware of the voluntary nature of their participation;
- ensure that unnecessary data processing is avoided, in particular by reconsidering the use of free text fields, and ensure that no sensitive data in the sense of Article 10 of the Regulation are processed;
- implement appropriate measures to prevent a reviewee from obtaining information revealing the identity of the contributors so that he/she cannot exercise any pressure against them, in particular vis-à-vis contributors from the (subordinated) staff category;
- remind the respective FC for every 360° feedback exercise of his/her obligation under Article 7(3) of the Regulation to process the personal data only for the purposes for which they were transmitted to him/her and request the FC to sign a declaration confirming this;
- reconsider the maximum retention ten years period applicable to the paper copy of the feedback report held by the Feedback Coordinator in a sealed envelope and establish the right for the reviewee to verify that the envelope remains sealed and to inform the reviewee accordingly;
- specify the "historical and statistical purposes" pursued by retaining the reviewee's name and the number of contributions received until the end of the reviewee's career and, based on this exercise, to determine whether such data can be stored without reference to the reviewee's name. At any rate, the EDPS recommends encrypting the reviewee's name;
- establish a procedure for dealing with requests by data subjects for access and/or rectification once the respective data have been transferred to the external consultant;
- perform a case-by-case analysis for requests for rectification in the light of the subjectivity involved in the feedback reports as well as their intended purpose, considering that the room for rectification thus relatively limited;

- examine the possibility of encryption for sending the surveys from the reviewee/contributors to the FC and for the correspondence between the FC and the external contractor and between the external contractor and the reviewee.

Done at Brussels, 20 December 2011

(**signed**)

Giovanni BUTTARELLI
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