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ASSISTANT SUPERVISOR

Mr Philippe RENAUDIÈRE
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European Commission
BRU BERL 08/180
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Brussels, 03 March 2010
GB/TS/kt/ D(20010)304 C 2010-0003

Dear Mr Renaudière,

Having examined your notification concerning Provision of Quality Interpretation submitted on 4th January 2010, we have come to the conclusion that this procedure is not subject to **prior checking** by the EDPS.

The notification was submitted under Article 27(2)(b) of Regulation 45/2001 which refers to processing operations intended to evaluate personal aspects relating to data subjects, such as their ability, efficiency and conduct.

The EDPS notes that the possible nature of the data processed by the specific IT tools used in SCIC to organise meetings, such as Meeting Report (Rapport de Séance) is considered to be the determining factor as to the necessity to subject this procedure to prior checking. He also takes note of the fact that some comments on the quality of interpretation collected within the Meeting Report may constitute "performance information" relating to a particular interpreter.

Nevertheless, the EDPS ascertains that the purpose of the data processing in question is the optimal management of the DG SCIC available resources (staff and accredited auxiliary conference interpreters) and not the individual evaluation of the particular interpreter. Thus, Article 27(2)(b) of Regulation 45/2001 is not applicable in the present case.

Also, the evaluation of interpreters at the Commission has already been examined by the EDPS on several occasions¹. Should any elements of "Provision of Quality Information" be

¹ cf. EDPS case 2006-001 - opinion of 21 March 2006 on SERIF (Système d'Enregistrement de Rapports sur les Interprètes Freelance, EDPS case 2006-364 - opinion of 22 December 2006 on the Management of personal data of auxiliary conference interpreters and EDPS case 2006-162 - letter of 30 November 2006 on the Management of personal data on in-house staff stored in Coraline and accessed via Signalétique

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relevant in relation to the procedures already examined by the EDPS, this should be specifically mentioned as an update to the already notified processing operations.

Please note that even though the EDPS does not find a specific risk to justify a prior checking procedure, compliance with the Regulation 45/2001 should be fully ensured within the procedure in question.

Should you have any other considerations that would necessitate reviewing of this position, please do not hesitate to contact us.

Yours sincerely,

(signed)

Giovanni BUTTARELLI