

REGISTER NUMBER: 122
NOTIFICATION FOR PRIOR CHECKING
<p>Date of submission: 14 September 2006</p> <p>Case number: 2006-437</p> <p>Institution: ETF</p> <p>Legal basis: article 27-5 of the regulation CE 45/2001⁽¹⁾</p> <p style="text-align: right;"><i>(1) OJ L 8, 12.01.2001</i></p>

INFORMATION TO BE GIVEN⁽²⁾
<i>(2) Please attach all necessary backup documents</i>
<p>1/ Name and address of the Controller Mr OLIVIER RAMSAYER - Head of Administration and Central Services - ETF European Training Foundation, Turin, Italy</p>
<p>2/ Organisational parts of the institution or body entrusted with the processing of personal data Administration and Central Services - Personnel Unit</p>
<p>3/ Name of the processing ETF Competence Inventory</p>
<p>4/ Purpose or purposes of the processing Establishment of a complete map of professional competences available at the ETF, through the "Competence Inventory" exercise</p>
<p>5/ Description of the category or categories of data subjects All staff and Detached National Experts (DNE) working at the ETF</p>
<p>6/ Description of the data or categories of data (<i>including, if applicable, special categories of data (article 10) and/or origin of data</i>) The data are collected and grouped under the following categories: Evidences (detailed textual examples of professional past experiences, elaborated in cooperation with the Sparring Partner), Grades (self-declared on a scale from 1 to 4 and moderated for consistency throughout the agency), self-declared Expertise Fields and Language Skills, comments of the Sparring Partner, comments of the Moderation Panel. In detail: Evidences are a self-declared demonstration of a relevant experience, leading to the assignment of a Grade (from 1 to 4) for a set of relevant professional and behavioural competences. The Expertise Fields indicate specific fields of professional experience, not necessarily supported by evidences. Language Skills are assessed against the European common reference levels. The comments of both the sparring partner and the panel constitute a record of the quality enhancement loop, built-in the Competence Inventory system.</p>
<p>7/ Information to be given to data subjects The competence profile resulting from the self-assessment (Grade) and the moderation of the panel is fed back to the Self-assessor and stored with the Personnel Unit.</p>

<p>8/ Procedures to grant rights of data subjects (<i>rights of access, to rectify, to block, to erase, to object</i>)</p> <p>The data recorded into the ad hoc IT system (CAF database) are accessible by the Personnel Unit and by the person in charge of the technical deployment of the system, delegated by the Head of Administration (Controller). The access to the database is direct and exclusive (each self-assessor has access to his/her own data only, from his/her computer; the access is controlled by a personalised password). The data can be modified at any time before finalisation (moderation). The updating of the data stored is performed normally every two years, following a reduced procedure; therefore each staff member has the right to update his/her own competence profile every two years. Once the data are recorded and stored, they cannot be further modified (until the next update).</p>
<p>9/ Automated / Manual processing operation</p> <p>The cycle of data and data improvement between the Self-assessor, the Sparring Partner and the Moderation Panel is entirely supported and automatised using the "CAF database" (see attached Handbook). The content input, from the self-assessor him/herself, is recorded directly into the CAF database and only the owner and his/her Sparring Partner have access to the document. From a technical side, assistance to the whole procedure is ensured by the delegated Controller (see above); this includes preparation of documents for Self-assessors and Moderation Panel and production of feedback reports. The whole procedure is automatised through a flow of data managed by the CAF database, with restricted access. The final set of data is resulting into individual reports to be fed back to the Self-assessors and a set of indexes allowing the analysis of the Competence Inventory.</p>
<p>10/ Storage media of data</p> <p>All data are stored in a protected area of the ETF servers (CAF database). Access to the database is granted only to Personnel Unit, Head of Administration and his delegate for this exercise, and the Management Team. Access is also granted to each staff member, to his/her own competence profile. Printed indexes are produced upon request, for Management Team and Personnel Unit only.</p>
<p>11/ Legal basis and lawfulness of the processing operation</p> <p>The Competence Inventory exercise falls within the requirements outlined by the Internal Control Standards 3 and 12, and is intended to support future HR strategies. In particular, to support the development of an integrated human resources management strategy to be applied to processes such as staff development and training, recruitment and career management; to enable all staff to identify areas for development through training and/or experiential learning opportunities and to promote a culture within the ETF that encourages trust, commitment, accountability and responsibility at all levels.</p>
<p>12/ The recipients or categories of recipient to whom the data might be disclosed</p> <p>Heads of Units and Heads of Departments</p>
<p>13/ retention policy of (categories of) personal data</p> <p>The data will be stored into the CAF database throughout the whole professional relationship between the ETF and the jobholder. The data will be erased in case the jobholder is no longer employed at the ETF.</p>
<p>13 a/ time limits for blocking and erasure of the different categories of data (on justified legitimate request from the data subject) (Please, specify the time limits for every category, if applicable)</p>
<p>14/ Historical, statistical or scientific purposes</p> <p><i>If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification,</i></p>
<p>15/ Proposed transfers of data to third countries or international organisations</p> <p>No transfer of data is foreseen to third parties. The content of the Competence Inventory is strictly confidential and for internal use only.</p>

16/ The processing operation presents specific risk which justifies prior checking (*please describe*):
The processing procedure of the data must ensure that the information stored are used solely for the purposes of the Competence Inventory and not distributed outside the group as described above.

AS FORESEEN IN:

Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject,

The nature of the data collected does indeed refer to the jobholder's past professional career. The evidences in support of the self-assessed grade for each given competence are not subject to any type of verification; the whole process is based on trust.

17/ Comments

PLACE AND DATE: Torino, 14 September 2006

DATA CONTROLLER: Olivier Ramsayer

INSTITUTION OR BODY: ETF - European Training Foundation