



RECORD NO: 56

360 ASSESSMENT EXERCISE FOR MANAGERS AND NON-MANAGERS

Record 56 of processing operation “360 assessment exercise for managers and non-managers”

Date of last update	8/7/24
Name and contact details of controller	ENISA, Corporate Support Services, Human Resources (HR), HR-general [at] enisa.europa.eu.
Name and contact details of DPO	Dataprotection [at] enisa.europa.eu
Name and contact details of Joint Controller	N/A
Name and contact details of processor	<p>External contractor PerformanSe, only for the specific 360 degrees assessment exercise and only for the participants officially invited to take part in the exercise (reviewees and reviewers). This service has been contracted by ENISA via a contract framework order form, subject to ENISA's general terms and conditions, and is a repetitive exercise, in line with ENISA's EDD No.11/2024 on the Strategic Workforce Planning of the Agency .</p> <p>The 360 assessment is conducted with the use of the data processor's application, which is stored in GlobalSP data centre (sub-processor), under specific contract with the data processor and hosted within EU.</p>
Purpose of the processing	<p>The purpose of the processing operation is to facilitate the organisation of the 360 degrees assessment exercise:</p> <ul style="list-style-type: none">- for managers (Executive Director, Heads of Units, Team Leaders, Heads of Sectors). The aim of the assessment exercise is to elevate reviewees awareness of how their management and leadership style is perceived by their reviewers. By comparing their self-assessment with the feedback from their reviewers, those undertaking the 360-feedback exercise can identify their strengths and areas that they may need to improve. The debriefing session allows reviewees to reflect on these development areas, providing valuable insights for crafting a comprehensive professional development plan.<p>There are 4 categories of staff members (reviewers) who are invited to contribute to the 360-assessment exercise for managers (reviewees):</p><ul style="list-style-type: none">o Manager: this category includes the direct hierarchical supervisor of the reviewee (1 person)o Peers: this category includes colleagues with whom the reviewee works directly and who report to the same direct hierarchical supervisor, as well as colleagues who work at the same level as the reviewee and may report to a different supervisor. A minimum of 3 responses are needed. There is no upper limit to the number of people in this category.o Team members: this category includes staff members who report to the reviewee. A minimum of 3 responses are needed. There is no upper limit to the number of people in this category.o Third parties: this category includes anyone with whom the reviewee works with on a regular basis, but who do not belong to any of the above categories. These may be internal or



external "customers" or other staff members, outside the reviewee's Unit or a stakeholder with whom the reviewee has regular interactions . A minimum of 3 responses are needed. There is no upper limit to the number of people in this category.

- **for non-managers (staff members - TAs or CAs, except for the Executive Director, Heads of Units, Team Leaders, Heads of Sectors).** The aim of the assessment exercise is to elevate reviewees awareness of how their performance is perceived by their reviewers. By comparing their self-assessment with the feedback from their reviewers, those undertaking the 360-feedback exercise can identify their strengths and areas that they may need to improve. The debriefing session allows reviewees to reflect on these development areas, providing valuable insights for crafting a comprehensive professional development plan.

There are 4 categories of staff members (reviewers) who are invited to contribute to the 360-assessment exercise for non-managers (reviewees):

- o Focus: the respondent
- o Manager: this category includes the direct hierarchical supervisor (including Heads of Units, Heads of Sectors, Team Leaders, Heads of committees/task forces etc.)
- o Colleagues: same level or same supervisor. A minimum of 3 responses are needed. There is no upper limit to the number of people in this category.
- o Third parties: this category includes anyone with whom the reviewee works with on a regular basis, but who do not belong to any of the above categories. These may be internal or external "customers" or other staff members, outside the reviewee's Unit or a stakeholder with whom the reviewee has regular interactions . A minimum of 3 responses are needed. There is no upper limit to the number of people in this category.

The process is as follows:

- o The reviewee proposes a list of reviewers to ENISA's HR (based on the aforementioned categories).
- o The proposed reviewers are invited to complete an assessment of the reviewee, as part of his/her 360-assessment exercise (participation for reviewers is voluntary).

The conduction of the 360-assessment exercises (for managers and non-managers) takes place in the dedicated platform provided by the data processor. The questionnaire includes both multiple choice questions (56 statements for managers and 33 for non-managers) and open-ended questions (2 open questions for managers and 2 for non-managers). At the end of the assessment period, the processor will produce aggregated assessment reports (without including individual assessments) for each of the reviewees.

The individual assessments (conducted by reviewers) are kept by the processor and will be deleted as soon as possible, after having provided the aggregated reports to the ENISA's HR. Each reviewee receives a copy of his/her individual report (no individual responses provided). The aggregated and individual reports of all managers shall also be shared with the ENISA's Executive Director and for non-managers will be shared with the line manager.

<p>Description of data subjects</p>	<ul style="list-style-type: none"> - Managers (Executive Director, Heads of Units, Team Leaders, Heads of Sectors) who are undertaking the 360 evaluation (reviewees). - Staff members who are undertaking the 360 evaluation (reviewees). - Staff members (reviewers) who are invited to contribute to the 360-assessment exercise for managers (reviewees).
<p>Description of data categories</p>	<p>The following personal data are being processed:</p> <p>For the reviewees:</p>

	<ul style="list-style-type: none"> ○ General identification information: Name; title, email address, age, nationality, language, evaluation history, educational background, position, role, sector, level of managerial responsibility. ○ Individual assessments related to each reviewee provided by reviewers (processed only by the data processor). ○ Aggregated report from the 360-assessment exercise for each reviewee (processed by the data processor and ENISA's HR). <p>For the reviewers:</p> <ul style="list-style-type: none"> ○ Name; email address – as provided in proposed lists by reviewees (processed by ENISA's HR and data processor). ○ Individual assessments provided by the reviewers for the reviewees, in which personal opinions of the reviewers are expressed (processed only by the data processor). <p>The final feedback received from the exercise (aggregated report) will be per reviewer category, not on the level of the individual reviewer. Hence, a minimum of 3 responses must be reached per category.</p> <p>Nevertheless, it should be mentioned that it cannot be entirely excluded that the aggregated reports could potentially contain identifiable information related to the reviewers, depending on the feedback provided in the open questions. In addition, the category 'manager' consists of only one person and thus confidentiality cannot be guaranteed for this category.</p>
Time limits (for the erasure of data)	<p>The individual assessments will be deleted by the data processor as soon as possible after the aggregated reports are sent to the ENISA's HR.</p> <p>The aggregated reports will be deleted by ENISA's HR as soon as possible, upon completion of the overall exercise.</p>
Data recipients	<p>The recipients of the data will be as follows:</p> <p>For the reviewees:</p> <ul style="list-style-type: none"> ○ Designated ENISA's HR staff members that are responsible for managing the exercise – only for the general identification information and for the filing of the individual reports. ○ Designated staff from PerformanSe (data processor) – access to all types of data (general identification, individual assessments, aggregated reports). ○ The Executive Director of ENISA – only for the general identification information, the individual assessments and the aggregated reports. <p>For the reviewers:</p> <ul style="list-style-type: none"> ○ - Designated ENISA's HR staff members that are responsible for managing the exercise – only access to the proposed list of reviewers per reviewee. ○ - Designated staff from PerformanSe (data processor) – access to identification data and individual reports provided by each reviewer.
Transfers to third countries	<p>No transfers of personal data outside the EU/EEA are taking place. The data processor has committed, under the contract with ENISA, to put in place all necessary safeguards foreseen under Chapter V GRPR if any future transfers take place.</p>
Security measures - General description	<p>Security policy of ENISA's internal systems; security measures of the data processor (and sub-processor) as mandated under specific contract with ENISA.</p>
Privacy statement	<p>Available to the users of the platform</p>