

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	1/10/25
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	PerformanSe, under a Framework contract, to which ENISA is also a party. 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
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"> <li>- <b>for managers (Executive Director, Senior Management, Heads of Units, Team Leaders, Heads of Sectors).</b> 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 5 categories of staff members who are invited to contribute to the 360-assessment exercise for managers (reviewees):</p> <ul style="list-style-type: none"> <li>o <u>Focus</u>: the respondent</li> <li>o <u>Manager</u>: this category includes the direct hierarchical supervisor of the reviewee (1 person);</li> <li>o <u>Peers</u>: 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.</li> <li>o <u>Team Members</u>: 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.</li> <li>o <u>Third Parties</u>: 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.</li> </ul> </li> </ul>



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, Senior Managers, 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 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 (Peers): 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:

1. The reviewee proposes a list of reviewers to ENISA's HR (based on the aforementioned categories). 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).
2. 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 (51 statements for managers and 33 statements 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 individual reports for each of the reviewees, and the coach. If a minimum of 3 answers are not reached per each category, then the answers would be excluded so that reviewers cannot be identified.
3. The individual assessments (conducted by reviewers) are processed and kept by the processor and will be deleted as soon as possible, after having provided:
  - i. The individual reports to each reviewee;
  - ii. The Agency aggregated report that will be send to the Executive Director and HR;
  - iii. The final coaching session.
4. Each reviewee is assigned to a coach from PerformanSe who also receives the individual report of the reviewee. The reviewee has then regular interactions with his/her coach on the findings of the assessment and how to advance his/her management and leadership style and skills.

Description of data subjects

- Managers (Executive Director, Senior Management, Heads of Units, Team Leaders, Heads of Sectors) who are undertaking the 360 evaluation (reviewees or reviewers).
- Staff members who are undertaking the 360 evaluation (reviewees or reviewers).
- Staff members or invited third parties (reviewers) who are invited to contribute to the 360-assessment exercise.

<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"> <li>• General identification information: Name; title, email address; position (only for the Executive Director, Senior Management, Heads of Unit, Team Leaders and Heads of Sector). This data is collected through a form developed by the data processor. The data are processed by ENISA's HR and the data processor.</li> <li>• Individual assessments related to each reviewee provided by reviewers (processed only by the data processor).</li> <li>• A report from the 360-assessment exercise for each reviewee (processed by the data processor and ENISA's HR)</li> <li>• Any personal information shared and exchanged with their coaches on their personal performance and notes taken during coaching sessions.</li> </ul> <p>For the reviewers:</p> <ul style="list-style-type: none"> <li>• Name; email address – as provided in proposed lists by reviewees (processed by ENISA's HR and data processor).</li> <li>• Individual assessments provided by the reviewers for the reviewees, in which personal opinions of the reviewers are expressed (processed only by the data processor).</li> </ul> <p>The final feedback received from the exercise for managers (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 reports could potentially contain identifiable information related to the reviewers, depending on the feedback provided in the open questions. In addition, for the managerial and non-managerial 360 exercise, the category 'manager' can consist of only one person and thus confidentiality cannot be guaranteed for this category.</p>
<p>Time limits (for the erasure of data)</p>	<p>The individual assessments will be deleted by the data processor as soon as possible after the individual reports and the aggregated reports are deleted after 1 month from the last coaching session. The aggregated reports are sent to the ENISA's HR and the reviewees. The aggregated reports are also stored by ENISA's HR to the personal file of each reviewee. At the end of the coaching sessions, coaches shall delete their notes and if requested by the reviewee transfer a copy to the reviewee.</p>
<p>Data recipients</p>	<p>For the reviewees:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Designated staff from PerformanSe (data processor) – access to all types of data (general identification, individual assessments, aggregated reports).</li> <li>• Designated staff from PerformanSe (data processor) acting as coaches – access to the aggregated report of the manager they will coach after the end of the 360 ° assessment exercise input collection.</li> <li>• The Executive Director of ENISA – only for the general identification information and aggregated reports.</li> <li>• The reviewees receive their own report and pursuant to EDD 11/2024 they will have to share their report with their Reporting Officer and HR. HR will file the 360 reports in the personal file.</li> </ul> <p>For the reviewers:</p> <ul style="list-style-type: none"> <li>• Designated ENISA's HR staff members that are responsible for managing the exercise – only access to the proposed list of reviewers per reviewee.</li> <li>• Designated staff from PerformanSe (data processor) – access to identification data and individual reports provided by each reviewer.</li> </ul> <p>Based upon the collection of data of the individual report, an organisation wide aggregated report will be provided to the Executive Director.</p>



	The data may upon request also be made available to EU bodies charged with monitoring or inspection tasks in application of EU law (e. g. internal audits, European Court of Auditors- ECA, European Anti-fraud Office – OLAF and IDOC - investigating cases of harassment).
Transfers to third countries	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.
Security measures - General description	Security policy of ENISA's internal systems; security measures of the data processor (and sub-processor) as mandated under specific contract with ENISA.
Privacy statement	Available to the users (reviewees and reviewers) of the platform

