

REGISTER NUMBER: 494

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 30/03/2009

Case number: 2009-220

Institution: ECB

Legal basis: article 27-5 of the regulation CE 45/2001⁽¹⁾

(1) OJ L 8, 12.01.2001

INFORMATION TO BE GIVEN⁽²⁾

(2) Please attach all necessary backup documents

1/ Name and address of the controller
Manfred Koch (Head of Division)
Kaiserstr. 29
60311 Frankfurt
Germany

2/ Organisational parts of the institution or body entrusted with the processing of personal data
DG HR, Budget & Organisation
Division HR Policies and Staff Relations

3/ Name of the processing
Evaluation of in-house training courses that are delivered by external consultants
Evaluation of external training activities attended by ECB staff members at an external institution

4/ Purpose or purposes of the processing
Data relate to the request for feedback from training participants on the relevance and quality of the training they attended. Such training measures can be one-off seminars (1 or 2 days), courses which take place for a period of several weeks/months (typically language training) and courses organised outside the ECB premises (external courses). The data include an assessment of the person providing the training. The purpose is to ensure good and constant quality management as well as control the content of training delivered to ECB staff members.

5/ Description of the category or categories of data subjects
ECB staff, ESCB/IO staff, secondees and interns as training participants
ECB/ESCB staff, consultants, third persons providing the training

6/ Description of the data or categories of data(*including, if applicable, special categories of data (article 10) and/or origin of data*)

Name, contact details and reasons for participation of participants, name of trainer.

Samples of the training evaluation forms are attached. As regards the evaluation of the trainers, participants are requested to provide feedback as to whether the trainer was knowledgeable on the subject, was motivating and provided insight, enabled appropriate level of individual participation in the class and kept participants engaged and held their interest. Other questions relate to whether the course material is helpful, the pace of the course was appropriate and the class exercises were effective. All evaluation forms provide some open space for comments what participants found most useful, what recommendations for improvements they have and whether the course should continue. Participants can also make suggestions which other training courses should be offered.

In the past, the evaluation forms for in-house training courses were given to the trainer by DG-H prior to the start of the training. These were distributed by the trainer at the end and completed by the participants. The forms were posted in a collecting box or received via internal mail and processed by the training administrator current process is described in section "Automated / manual processing operation".)

The trainers are made aware orally and in written format that their performance and the delivery of the seminar contents will be evaluated and that they will be provided with the aggregated and anonymous data on a regular basis. A trainer's brochure is distributed where all relevant issues related to the training delivery are mentioned including the evaluation forms. Participants are informed as well that the information they provide will be forwarded to the trainer on an anonymous basis for data protection purposes.

The evaluation form for external courses was available on the intranet site that was accessible to all participants. The form was completed, sent to the manager for information and his/her signature and to DG-H for the P-file.

7/ Information to be given to data subjects

Persons delivering in-house training are provided with aggregated feedback on the training measure twice a year on an anonymous basis. Upon request, participants' feedback can be provided after each training course.

8/ Procedures to grant rights of data subjects(*rights of access, to rectify, to block, to erase, to object*)

No specific procedure applies. As regards feedback to trainers see above. Participants would be granted access to their evaluation form upon request (this case has never happened).

9/ Automated / Manual processing operation

Evaluation forms were collected on the basis of hard-copy documents. Since September 2008 feedback is only provided via the ECB's Enterprise Resource Management system (ISIS). With the introduction of the Learning Solution Module of SAP, all evaluation forms have been made available on-line and in the training activities of the participants. Participants complete the form on-line and feedback can be seen only by the responsible training administrator. Aggregated feedback reports are available and can be sent to the trainer.

10/ Storage media of data

See section 9.

11/ Legal basis and lawfulness of the processing operation

The trainers' brochure that is provided to all trainers that contains information on feedback and evaluation forms apart from other organisational information (attached). Article 11.6 of the ESCB Statute.

<p>12/ The recipients or categories of recipient to whom the data might be disclosed Training team of DG-H, DG-H management, trainers (external and internal).</p>
<p>13/ retention policy of (categories of) personal data Evaluation forms are kept in accordance with the Retention Policy of the ECB. For such kind of documents, the policy foresees a retention period of five years.</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) for blocking: no time limit apply; for erasing: no time limit applies</p>
<p>14/ Historical, statistical or scientific purposes <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> not applicable</p>
<p>15/ Proposed transfers of data to third countries or international organisations not applicable</p>
<p>16/ The processing operation presents specific risk which justifies prior checking (<i>please describe</i>):</p> <p>AS FORESEEN IN:</p> <p><input type="checkbox"/> Article 27.2.(a) Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,</p> <p>X Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject,</p> <p>It is this category that applies due to the evaluation character of the training forms.</p> <p><input type="checkbox"/> Article 27.2.(c) Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,</p> <p><input type="checkbox"/> Article 27.2.(d) Processing operations for the purpose of excluding individuals from a right, benefit or contract,</p> <p><input type="checkbox"/> Other (general concept in Article 27.1)</p>
<p>17/ Comments</p>
<p>PLACE AND DATE: Frankfurt am main, 30 March 2009</p> <p>DATA PROTECTION OFFICER: Martni Benisch</p> <p>INSTITUTION OR BODY: European Central Bank (ECB)</p>