

Cedefop record of processing activity

Career development review

Record of Cedefop activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No. 45/2001 and Decision 1247/2002/EC.

Nr.	Item	Description
Career development review		
1.	Last update of this record	05/04/2024
2.	Reference number	Case no 2010-0620
3.	Name and contact details of controller	Cedefop – European Centre for the Development of Vocational Training Postal address: Cedefop Service Post, Europe 123, 570 01 Thessaloniki, GREECE Telephone: (+30) 2310-490111 Email: info@cedefop.europa.eu Responsible department or role: DRS / Human Resources Functional email address for enquiries on processing of personal data: hr_data_protection@cedefop.europa.eu
4.	Name and contact details of DPO	data-protection-officer@cedefop.europa.eu
5.	Name and contact details of joint controller (where applicable)	n/a

6.	Name and contact details of processor (where applicable)	• Reporting officers (Heads of Department, Deputy Director and Executive Director) and reporting officers by delegation (the jobholder's hierarchical superior) if applicable; • Countersigning officers in case of unsatisfactory performance only (reporting officer's hierarchical superior); • The appeals assessor (the direct superior of the reporting officer); • The Executive Director, Deputy Director and Heads of Department when examining the comparative merits of the staff eligible for promotion/reclassification; • Members of the Joint Promotion and Reclassification Committee in case a staff member complains against non-promotion; • Members of Cedefop's Appeals Committee • HR staff • ICT administrators when needed to intervene for technical support
7.	Very short description and purpose of the processing	The purpose of the annual appraisal is to assess individual performance in the course of a given reporting period. The appraisal system comprises two parts: (1) setting individual objectives for the year aligned with the Agency's priorities and work plans, as well as the professional development aspirations of the staff member; (2) assessing the staff member's performance and in particular the efficiency, ability and conduct in the course of the previous year.
	Description of categories of persons whose data Cedefop processes and list of data categories	Data subjects: The data subjects are officials, temporary agents except the Executive Director (art 1 (1) DGE) and contract agents of Cedefop who have been in active employment for a continuous period of at least one month (art. 2 DGE) in the appraised year.

		For staff who fall into one of the four categories below, a report is drawn up only if the jobholder submits an express request to that effect to their reporting office. The categories concern officials, temporary staff or contract staff who: • are to be retired automatically under Article 52 of the Staff Regulations in the year following the reporting period; • are the subject of a Cedefop decision leading to termination of their service, within the meaning of Article 47 of the Staff Regulations, in the year following the reporting period; • have been granted an invalidity pension by Cedefop under Article 78 of the Staff Regulations which takes effect in the course of the reporting period or the year following the reporting period; • have either left the service of Cedefop permanently during the reporting period or will do so in the year following the reporting period Categories of personal data processed: The data required for the career development report are: (1) Report details - staff number - reporting officer by delegation: surname, first name, staff number, function - reporting officer: surname, first name, staff number, function (2) Personal details of the jobholder - surname, first name - personal number - type of contract, category and grade - location (i.e. dept/service) - period of appraisal (from... to...) (3) Job description (4) Initial dialogue (planning of objectives for the period) - objectives in relation to the dept/service work programme (agreed objectives, assessment criteria) - objectives in relation to learning and development
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		(5) Self-assessment (achievement of objectives) (6) Assessment of the reporting period by reporting officer (by delegation) and signature The assessment covers efficiency, abilities and conduct (7) Final approval - Signature of person under assessment (8) Appeal - Dialogue between jobholder and appeal assessor - Any supporting documents provided by the jobholder and/or the appeal assessor - Appeal assessor's decision and signature
9.	Time limit for keeping the data	Career development reviews are stored in FlowForma (Sharepoint) and Livelihood for 10 years in line with Cedefop's retention schedule. Once finalised, the CDR report is filed in the jobholder's personal file. As the CDR report is part of the personal file, the conservation period is the same as for the personal file, i.e. 8 years after the extinction of all rights of the person concerned and of any dependents, but at least 120 years after the date of birth of the official concerned. Storage of anonymised CDR-related data for historical, statistical or scientific purposes is envisaged.
10.	Recipients of the data	Categories of recipients The staff appraisal module is used by: - jobholders (officials, temporary and contract staff at Cedefop); - reporting officers (the jobholder's hierarchical superior); - reporting officers by delegation - countersigning officers (reporting officer's hierarchical superior); - the appeals assessor (the Deputy Director or Executive Director of Cedefop or where the Executive Director acts as reporting officer, the

		Commission representative on the Management Board who is the most senior in the highest grade); - staff members in the Human Resources service dealing with the appraisal and/or promotion/reclassification processes. The following may be provided with a copy of the CDR report: - members of the Appeals Committee - members of the Joint Promotion and Reclassification Committee - persons responsible for examining appeals pursuant to Article 90 and cases brought before the court; - staff members in charge of inquiries and disciplinary proceedings; - auditing/supervisory bodies (IAS, Court of Auditors, OLAF, EDPS) - external contractors of Cedefop if and when needed to perform the duties they were hired for (e.g. an external lawyer) In case of staff members moving to another Community institution the Career development reviews are transferred there as an integral part of the transfer of the personal file.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No
12.	General description of security measures where possible.	Both technical and administrative security measures are taken to guarantee secure processing. Access to personal data is protected by the fact that the right to access data stored in FlowForma, Livelink and Sharepoint is granted on a "need to know" basis depending on the duties of the people allowed access. In FlowForma a specific HR-CDR role exists, in which a limited number of HR staff are included. Access to the CDR module in FlowForma is managed by permissions which are set according to specific roles in the CDR workflow, i.e. jobholder, reporting officer, reporting officer by delegation, countersigning officer, appeal assessor, HR.

		The CDR module in FlowForma guarantees data integrity since validated data cannot be changed subsequently, even by the data subject, once they have been electronically signed by the author (for exceptions, see points 1-2 under the section 'locking and deleting of data').
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<i>Privacy Statement available on intranet</i>