

Cedefop record of processing activity

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 |
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| <i>Staff Engagement Survey</i> | | |
| 1. | Last update of this record | 20/10/2022 |
| 2. | Reference number | CDFNOT085 – Staff Engagement Survey |
| 3. | Name and contact details of controller | <p><u>Cedefop – European Centre for the Development of Vocational Training</u> Postal address: Cedefop Service Post, Europe 123, 570 01 Thessaloniki, GREECE Telephone: (+30) 2310-490111 Email: info@cedefop.europa.eu</p> <p>Responsible department or role: Head of HR, Department for Resources (DRS)</p> |
| 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) | <ul style="list-style-type: none"> The 2022 Cedefop Staff Engagement Survey is provided by PricewaterhouseCoopers EU Services EESV (“PwC”) and Intellera Consulting Srl (“Intellera”) (jointly referred to as the “Service Provider”) The surveying tool “Qualtrics”, an Application Service Provider (ASP) using a Software-as-a-Service (SaaS) platform, for creating and distributing online surveys. The privacy statement of Qualtrics can be found via this link. |

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| 7. | Purpose, legal basis and description of the processing | <p>Purpose of the processing: To collect the views of staff on a range of issues (professionalism, integrity and independence, accountability, diversity, respect, my job, working conditions, communication, cooperation etc.) and to help Cedefop find any possible current areas for improvement.</p> <p>Description of the processing:</p> <ul style="list-style-type: none"> • PWC conducted the 2019 staff engagement survey, and will conduct it again in 2022; • PWC & Intellera send an email invitation to all staff inviting them to participate. The email contains a link to the survey, which is hosted on the Qualtrics platform; • Email addresses are only used to send to staff members the emails with the link to participate in the survey; • When the completed survey is submitted, Qualtrics is configured to erase the email address; • PWC & Intellera analyse the data and feedback and send aggregated and anonymous data to Cedefop in the form of a report, excluding results that could aid the identification of individuals; • Breakdowns by personal characteristics (i.e., demographic and organisational information such as gender, job tenure, managerial level...) will be shown only when the number of respondents is higher than five; • Anonymity will be guaranteed in all outputs presenting the surveys' results: survey answers and results will be anonymous, and it will not be possible for either the Service Provider or for Cedefop to link the answers provided to the email address of each respondent; • The final report will be posted on the Intranet and shared with the Management Board. The open text comments will not be annexed to it, although some comments might be quoted in the report; • All open comments will be shared with the Management Team (i.e. Executive Director, Deputy Director, Heads of Department), upon request. |
| 8. | Description of categories of persons whose data the EDPS processes and list of data categories | <p>Data subjects: All Cedefop staff (officials, temporary agents, contract agents, SNEs)¹</p> <p>Categories of personal data processed:</p> |

¹ All Cedefop employees with at least 3 months of experience from the launch date of the survey, will be invited to take part in the survey.

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| | | <ul style="list-style-type: none"> • Work email addresses (provided to PWC & Intellera to allow them to email a link to the survey to Cedefop staff); • Other data collected for technical purposes are the survey start/end date and its duration; • When filling in the survey, staff are asked to indicate if they are in a managerial position, the Department they work in, their gender, contract type, years of service at Cedefop and if they are an expatriate or not; • Staff also have the option to complete two open text questions. |
| 9. | Time limit for keeping the data | <p>PWC & Intellera have configured the platform Qualtrics to delete the email address of staff members immediately upon submission of the survey.</p> <p>Anonymised survey microdata (i.e. minus data that could aid the identification of individuals) is retained for benchmarking and comparison purposes, as other agencies have completed the same survey.</p> <p>The survey data is kept according to the Cedefop Records Classification Plan and Retention Schedule.</p> |
| 10. | Recipients of the data | <p>In addition to the abovementioned processors (in section 6):</p> <ul style="list-style-type: none"> • Cedefop designated HR staff to receive the final report from PwC and open comments (all data will have been processed by the service provider to guarantee anonymity); • Cedefop's Management team to receive fully aggregated and anonymous data, and the comments upon request. When necessary and in order to guarantee anonymity, language checks and rewording in the comments will be carried out by the contractor. • All Cedefop staff will receive the aggregated information derived from comments (ie. most recurring key themes together with the number of related comments). |
| 11. | Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards? | <p>For all the activities carried out under the Staff Engagement Surveys' framework contract, data residence is exclusively in the EU.</p> |
| 12. | General description of security measures where possible. | <ul style="list-style-type: none"> • PWC & Intellera employ appropriate security procedures to protect the confidentiality and security of the survey responses. Access to survey responses stored in their database is restricted; • All PwC & Intellera consultants are bound to confidentiality by a clause in their contracts; |

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| | | <ul style="list-style-type: none"> • PWC & Intellera maintain an Information Security Management System (ISMS), that is certified according to ISO/IEC 27001:2005 and is aligned to the control requirements of ISO/IEC 27002:2005. In addition, PwC adheres to the Information Security Policy of the PwC global network of member firms; • Qualtrics also adheres to the principles set forth in the most important international standards, such as ISO 27002, and regularly verifies its compliance; • Qualtrics platform is compliant with GDPR; for more information please see here; • PWC has configured the platform Qualtrics to enable access only through individually distributed access links (this prevents internet search engines from indexing distributed links); • Qualtrics platform is also configured to delete the email address of staff members immediately upon submission of the survey; • All Qualtrics accounts for survey administrators are password protected, and all data is replicated in real-time; • All files in Cedefop's records bank are secured with Cedefop's ICT security measures (e.g. authentication) |
| 13. | For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement: | <p>Privacy statement available here:</p> <p>https://livelink.cedefop.europa.eu/livelink/livelink.exe?func=ll&objaction=overview&objid=29722420</p> |