We've compiled this guide to help you understand how best to collect, access, process and protect the data in your BELBIN Online Account.

Please note: this document is for information and advice only and does not constitute a legally-binding contract. Please click the following links to view our <u>privacy policy</u> and <u>purchasing terms and conditions</u>.

At BELBIN, we make every effort to ensure that your data is held and processed securely, but we also depend on you to play your part and ensure that everyone who completes a BELBIN inventory under your account has a positive experience.

It's up to you to ensure that the data under your BELBIN Online Account is held and used in accordance with data protection laws in your country. Since our servers are held in the UK, the data is also subject to the laws of the EEA (European Economic Area).

**GDPR**, or the General Data Protection Regulation, will be in force from May 2018. Pursuant to the 1998 Data Protection Act, this regulation places a greater responsibility on organisations to communicate with data subjects concerning: why data is being collected and held; what kind of data is held, and the rights the individual may exercise with regards to their own data.

For the most part, BELBIN acts as the **data processor**, collecting and processing data on behalf of our customers, the **data controller**. Each individual whose data is collected is known as a **data subject**. In some cases (such as when we run training courses and workshops), BELBIN also acts as the **data controller**, since we access the data and control how it will be used. Each of these parties has rights and obligations within GDPR. Since the data controller will often purchase access to a BELBIN questionnaire and report on behalf of a data subject, but the data subject also has rights over the data, we need to balance these responsibilities and obligations carefully.

### **BELBIN** definitions

Account Administrator – the person (or people) within your organisation who have access to the BELBIN Online Account's 'Administrator area' (this page is shown immediately after login). Account Administrators are able to set up Working Accounts, compile and view reports, and edit account and individual details.

Working Account Holder – the person (or people) to whom the account administrator has supplied access for the administration/management/viewing of a particular Working Account (or subgroup of responses). The Working Account holder has access to the 'Check Progress' page for a given Working Account, but not to the remainder of the BELBIN Online Account.



Let's look at how to promote best practices for data protection at various stages of the BELBIN process.

#### **Setting up a BELBIN Working Account**

As Account Administrator, you should set up a Working Account for each group that completes a BELBIN assessment. You should use an appropriate Working Account password for each group, so that data can be easily located.

You should not use the same Working Account for all your data, since it makes it more difficult to find and manage data when needed. Each Working Account is limited to 100 Self-Perception Inventory responses, so if you do not create separate Working Accounts as you go, you may find that you hit this upper limit at an inopportune time.

If you are an Account Administrator, you can produce Team Reports for individuals across different Working Account passwords, so there is no restriction in this regard.

### Specifying who has access to data

When individuals log in to complete their BELBIN questionnaire, they will be notified on-screen as to who will have access to their data. This is usually limited to the Account Administrator and Working Account Holder, although an additional third party may also be specified. It is important that this information is accurate and up-to-date, so that individuals know who will be able to view their data. If there are any changes to this information, it is your responsibility to notify individuals under a given Working Account *prior* to changes being made, so that they may elect to remove their data if they wish.

### **Setting up a BELBIN Working Account**

The Account Administrator should create a Working Account for each group that completes a BELBIN assessment. You should use an appropriate Working Account password for each group, so that data can be easily located.

#### Completing a questionnaire

Upon login, individuals will view a privacy notice which details BELBIN's legal basis for collecting the data, and links to our longer privacy policy. Since the collection of data is in fulfilment of a contract (your purchase of BELBIN reports), we do not need to collect consent before someone completes a BELBIN questionnaire.



#### **Issuing reminders**

The BELBIN system offers the functionality to issue reminders, but please be sparing when doing so, so as not to cause annoyance. It can be difficult to encourage individuals to respond, but in our experience, people are most likely to do so when those responsible for the account:

- 1. Let participants know why they are completing the questionnaire (e.g. for a particular course or exercise);
- 2. Offer reassurances as to the nature of the BELBIN process (for example, stating that there are no right or wrong answers);
- 3. Help individuals to understand the benefits to their own working life (for example, that BELBIN celebrates individual difference and helps people to work better together);
- 4. Set a deadline (preferably not too far in the future).

This information can be added when issuing an invitation, whether via the BELBIN system or via your own email package.

### **Handling Observer Assessments**

Once an individual has completed a Self-Perception Inventory (SPI), BELBIN recommends that they collect up to 6 Observer Assessments (feedback from others they work with). This information is combined with the Self-Perception data to produce a report showing how others experience and interpret the individual's behaviour. In order to give an individual ownership and control of their final report, we recommend that the individual is allowed to select and invite their own Observers. However, you may wish to provide guidance as to the work context from which these observers are selected.

In order to ensure a positive experience for all concerned, Observers:

- 1. Should be encouraged to respond openly and honestly;
- 2. Should be given to understand how their responses will be used (this is explored in the introduction to the assessment);
- 3. Should be assured that their individual responses will not be disclosed to the individual concerned.

Although the facility is available to Account Administrators within the Online Account, we do not recommend anonymising Observer names, since this impairs interpretation of, and learning from, the reports.



To protect Observers' confidentiality, the BELBIN Online Account does not produce Individual Reports containing Observer information when fewer than 4 Observer Assessments have been completed.

When producing reports, you should avoid disclosing reports to an individual each time an Observer Assessment has been completed (for example, sending after 4, 5, and 6 Observer Assessments have been completed), since this compromises the confidentiality of individual responses.

#### **Troubleshooting emailing issues**

Emails from the BELBIN Online Account are sent automatically, so they can end up in junk mail or spam. You may wish to advise your participants to allow or 'whitelist' emails from <a href="mailto:Admin@belbin.com">Admin@belbin.com</a> prior to issuing invitations from the system.

If an invitation has not been received, please advise participants to check junk mail before issuing a reminder or contacting BELBIN.

### 'Check Progress' page

Your 'Check Progress' page allows the Account Administrator and/or Working Account Holder to check the progress of Self-Perception Inventories and Observer Assessments (if applicable) at a glance. This page is password-protected and is intended for use by Account Administrators or the relevant Working Account Holder(s) only.

When your account is set up, a link to the 'Check Progress' page is supplied, and a password will be sent to you separately.

### Please do not share the link to your 'Check Progress' page with the participants listed on it.

The 'Check Progress' page is not intended to be accessed by those completing their inventories, since it lists information for everyone under a particular Working Account. If you want to issue or re-issue an individual invitation, please navigate to the 'Check Progress' page, enter your password and issue an individual invitation or reminder as required.

It is your responsibility to ensure that you keep your password safe and do not share it with anyone who should not have access to the data held within.



#### Data transfer

From time to time, we receive requests to transfer BELBIN data from one account to another. If this request is made by an Account Administrator or Working Account Holder, we require permission from each individual whose Self-Perception data is to be transferred, before performing the action. If the request is from the data subject (the individual in question), we will take reasonable steps to notify the Account Administrator (and/or Working Account Holder where applicable) that the request is to be actioned.

Transferring data remains entirely at BELBIN's discretion. We will do our utmost to assist customers in deriving most use from their purchase of BELBIN reports, whilst ensuring that we act within data protection laws.

### Data storage and deletion

In accordance with GDPR, you, as data controller, have an obligation to ensure that data is kept up-to-date and is kept no longer than required. We know that BELBIN reports can be used in myriad ways and that customers sometimes refer back to reports to analyse how an individual's Team Role contributions change over time. As such, we do not routinely delete data from the Online Account.

However, we do advise customers to:

- a) Perform a regular audit of data held under their account;
- b) Delete data from their systems when no longer required;
- c) Provide data subjects with copies of their reports before deletion, for their personal benefit and information.

Should a data subject wish for their data to be deleted, the Account Administrator has permissions to perform these actions within the Online Account. Individuals may be deleted via the Housekeeping menu, whilst entire Working Accounts (including the data contained within) may be deleted by selecting a Working Account for editing and clicking the 'Delete' button. You will be asked to confirm your choice, since this action is irreversible. Please note that there is also an option to archive a Working Account. This does *not* delete data outright, it merely removes the data from view.

When data is deleted from your Online Account, it will also be eradicated from our server backups within 30 days. If you are unsure as to whether data has been deleted correctly, or require a data destruction note, please contact BELBIN.



Please see our data deletion policy for more information on deleting data.

Please note that, in addition to the data held on our servers, PDF copies of reports are also produced when someone completes a questionnaire, or when a report request is submitted from within the Online Account. PDF reports are held on our servers for a period of 90 days, during which time they may be transmitted to you, as account holder, via email and/or downloaded from within the Online Account.

It is your responsibility to ensure that PDF documents downloaded from the BELBIN Online Account are saved and stored securely, and deleted when no longer required, in accordance with data protection law and your organisation's regulations, if applicable. BELBIN cannot be responsible for the safeguarding of documents containing personal data which are downloaded from the Online Account.

#### Logging out

Please log out promptly when you have finished using your Online Account or 'Check Progress' page, especially when using a computer to which others have access. If you leave your session logged in, it is possible for others to access the data contained within the account.

For more information on privacy and data protection, please see our <u>privacy policy</u>. If you have any further questions, please don't hesitate to get in touch.

