

# Independence Policy for ECDC Staff

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## 1. Purpose

As stated by Regulation (EC) No 851/2004 of the European parliament and of the Council of 21 April 2004 establishing a European Centre for Disease Prevention and Control<sup>1</sup> (ECDC) (hereinafter referred to as the 'Founding Regulation') in its Recital,14: "*the confidence of the Community institutions, the general public and interested parties in ECDC is essential. For this reason, it is vital to ensure its independence, high scientific quality, transparency and efficiency*". Excellence, independence and transparency are essential elements of the ECDC work.

- a. Transparency: openness and transparency in the development of experts' opinions, guidance, advice and recommendations are critical as they provide a framework in which stakeholders can have confidence in the scientific quality and integrity of work.
- b. Independence: under Article 11 of the Staff Regulations, a staff member shall carry out his duties and conduct himself<sup>2</sup> solely with the interests of the Union in mind. He shall neither seek nor take instructions from any government, authority organisation or person outside his institution.

Independence of staff members is an essential element to ensure independence from the influence of industry, other stakeholders and lobby groups, private parties with an interest (for the different areas, e.g. pharmaceuticals, food safety, etc.), and for the work perceived to be carried out foremost in the public interest. Not only actual conflict of interest but also the perception of conflict of interest is important, since it can impact upon ECDC's reputation.

- c. Excellence: all ECDC experts involved in developing opinions, guidance, advice and recommendations should be assigned to a task on the basis of proven scientific excellence and commitment.

The Independence Policy (hereinafter the "Policy") has been developed to describe how independence and transparency, both in scientific advice and the day-to-day operations of ECDC, is to be maintained.

## 2. Scope

### 2.1. *Content of this policy*

This Policy is setting out the rules and procedures for the staff members of the ECDC to comply with the obligations laid down by the Founding Regulation regarding independence and the prevention of conflict of interests.

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<sup>1</sup> OJ L 142, 30.4.2004, p.1, recital 14

<sup>2</sup> Any reference in this Policy to a person of the male sex shall be deemed also to constitute a reference to a person of the female sex, and vice versa, unless the context clearly indicates otherwise.

In particular, point 4 of this Policy establishes for the staff members identified in point 8, the obligation to declare any involvement in the interests and activities listed in point 5 of this Policy.

When complying with this obligation to declare interests and activities, the staff member is also applying Articles 11 and 11a of the Staff Regulations which set out the obligation for the candidate to inform the appointing authority of any actual or potential conflict of interest, and for the staff member to inform the appointing authority of any personal interest such as to impair his independence.

However, it is important to note that informing the appointing authority of the interests and activities listed in point 5 of this Policy does not discharge the staff member from immediately informing of any other actual or potential conflict of interests, under Articles 11 and 11a of the Staff Regulations. It does not discharge him either from the obligations set out in Article 12b and 13 of the Staff Regulations, which refer to the obligation to obtain the authorisation of the appointing authority before engaging in any outside activity and to the obligation to inform the appointing authority of the gainful employment of the spouse.

## ***2.2. To whom it applies***

This policy applies to the ECDC Director, Heads of Unit (HoU) and other ECDC staff (temporary agents, contract staff, seconded national experts –SNEs- and trainees<sup>3</sup>) participating in activities in which their evidence, expert opinion and advice may influence the scientific position of ECDC, regardless of their official job title or function, except otherwise stated.

With the exception of SNEs and trainees, this policy does not cover individuals that are not staff members falling under the Staff Regulations of Officials (“Staff Regulations”) and the Conditions of Employment of Other Servants of the European Union (“CEOS”)<sup>4</sup> such as members of the ECDC Management Board (MB) and Advisory Forum (AF) and other individuals working with ECDC, including interims, contractors and external experts.

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<sup>3</sup> For the purposes of this decision, seconded national experts and trainees are considered “staff members” except when quoting the Staff Regulations which does not apply to SNEs and trainees.

<sup>4</sup> i.e. temporary staff and contract staff as defined under Articles 2 and 3a of the Conditions of Employment of Other Servants of the European Union. OJ L 56, 4.3.1968, p. 1, as last amended by Regulation (EU, Euratom) No 1023/2013 of the European Parliament and of the Council of 22 October 2013, OJ L 287, 29.10.2013, p.15.

### 3. Legal basis

- The Founding Regulation, and in particular Article 19 thereof.
- The Staff Regulations of Officials ("Staff Regulations") and the Conditions of Employment of other Servants ("CEOS") of the European Union laid down by Council Regulation (EEC, Euratom, ECSC) No 259/68<sup>5</sup>, and in particular Articles 11 and 11a<sup>6</sup> of the Staff Regulations and Articles 11 and 81 of the CEOS.
- The Financial Regulation of the European Centre for Disease Prevention and Control and its implementing rules, adopted by the Management Board on 13 August 2019.
- The ECDC Code of Good Administrative Behaviour.
- Rules applicable to National Experts on the secondment to ECDC, as adopted by Director's Decision 35/2009.

### 4. Definitions

#### 4.1. *Conflict of Interests (CoI)*

Under Article 11a of the Staff Regulations, staff members shall not, in the performance of their duties, deal with a matter in which, directly or indirectly, they may have any personal interests such as to impair their independence, and, in particular, family and financial interests.

In particular, a CoI is said to exist when a person appointed to a function/task has an actual or apparent, personal or vested interest in the outcome of decisions or actions resulting from that function/task. This includes interests which may reasonably be perceived by a third party as adversely affecting an individual's ability to act independently in his activities for ECDC.

#### 4.2. *Declaration of Commitment (DoC)*

According to Article 19(2) of the ECDC Founding Regulation, the Director of ECDC shall make a Declaration of Commitment. This constitutes a written undertaking to act in the public interest and independently of any external influence.

Such Declaration of Commitment shall be made annually (ADoC) in writing also by each HoU.

#### 4.3. *Declaration of Honour (DoH)*

A Declaration of Honour constitutes a written undertaking by an SNE to comply with the Rules applicable to National Experts on the secondment to ECDC<sup>7</sup>, and a declaration that there is no conflict of interest

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<sup>5</sup> OJ L 56, 4.3.1968, p. 1, as last amended by Regulation (EU, Euratom) No 1023/2013 of the European Parliament and of the Council of 22 October 2013, OJ L 287, 29.10.2013, p.15.

<sup>6</sup> Articles 11 to 26a of the Staff Regulations are applicable by analogy to temporary agents and contract agents, pursuant to Articles 11 and 81 of the CEOS, respectively. Any reference in this Decision to those Articles of the Staff Regulations shall be understood as applicable by analogy to temporary and contract staff by virtue of Articles 11 and 81 of the CEOS.

<sup>7</sup> As adopted by Director's Decision 35/2009.

between the functions the SNE performs for his employer or the professional activities of the SNE's close family, and the tasks he will undertake for ECDC.

#### **4.4. Declaration of Interests (DoI)**

Article 19(2) of the Founding Regulation states that the Director shall make in writing an annual declaration of interests indicating either the absence of any interests which might be considered prejudicial to his independence, or any direct or indirect interests which might be considered prejudicial to his independence.

Pursuant to Article 19 of the Founding Regulation, the Director shall declare at each meeting any interests which might be considered prejudicial to his independence in relation to the items on the agenda. In such cases the Director has to disqualify himself from relevant discussions and decisions.

ECDC extends the obligations under point 4.4 to the staff members mentioned in point 8 of this Policy, who will also have to update their DoI upon any relevant change of circumstances.

A DoI is a formal notification to the appointing authority of an individual's interests which may conflict, or may reasonably be perceived by a third party as detrimental to the interests of the European Union, thus adversely affecting an individual's ability to act independently in his/her activities for ECDC.

There are three types of DoI:

##### **a. Annual Declaration of Interests (ADoI)**

An ADoI is the standard format for DoIs. It allows declaration of relevant interests that may give rise to a conflict of interests in the context of a ECDC's field of activity. ADoIs include details of current activities and those completed in the last five years by the individual and, where relevant, by their household members as defined in point 5, IX of this Policy. ADoIs are updated on a yearly basis and upon any relevant change of circumstances. ADoIs are made in writing.

##### **b. Specific Declaration of Interests (SDoI)**

An SDoI is linked to a specific subject matter or item of a meeting/activity and it allows ECDC to review and assess whether a conflict of interests exists in the context of the specific meeting/activity. SDoI's will be requested by ECDC from its staff where time for collection or update of the ADoI is too short (e.g. in case of rapid risk assessments) or where the absence of an interest will need to be expressly documented (e.g. involvement in procurement procedures). SDoIs are made in writing.

##### **c. Oral Declaration of Interests (ODoI)**

An ODoI may be required at the beginning of a meeting or discussion, after consideration of all agenda items (including "any other business" points added) or issues for discussion. In making this declaration, an individual shall notify any additional interests or change in circumstances declared in the ADoI which must be recorded. ODoIs are made orally and recorded in the minutes.

## **5. Which interests should be declared?**

In application of the provisions mentioned in point 4.4, staff members of the ECDC shall declare the details of any involvement in the interests and activities listed below in all types of DoI. These activities

can be current or past (five years prior to the declaration). It is important to note that declaration of an activity in a DoI form does not exempt a staff member from the obligation to obtain prior permission from the appointing authority before engaging in an outside activity according to Article 12b of the Staff Regulations. In case an activity has already been authorised under Article 12b of the Staff Regulations, the Staff Member shall indicate so in the DoI.

Nature of the activities to be declared:

**Ownership or other investments, including shares** is to be interpreted as meaning any financial interests in a company/entity operating in the health sector, including holding of stocks and shares, equity, bonds, partnership interests in the capital of a company, one of its subsidiaries or a company in which it has a holding. The holding of financial interests connected with a pension scheme or an equivalent financial instrument would not be considered a financial interest, provided that the individual has no influence on its financial management.

**Member of a Managing Body or equivalent structure** is to be interpreted as meaning any participation in the internal decision-making (e.g. board membership, directorship) of a company, trade association or equivalent entity operating in a domain falling within ECDC's remit.

**Membership of a Scientific Advisory Body** is to be interpreted as meaning that the person concerned is participating or has participated in the works of a Scientific Advisory Body operating in a domain falling within ECDC's remit, with a right to vote on the outputs of that entity (e.g. voting on scientific output adopted by that entity.)

**Employment** is to be interpreted as covering all forms of employment, part-time and full-time, either paid or unpaid, in any organisation whose activities fall within ECDC's remit.

**Consultancy/Advice** is to be interpreted as an activity in which the concerned person charges or does not charge a fee for providing advice or services in a particular field falling within ECDC's remit.

**Research funding** is to be interpreted as meaning any funding for research in relation to a matter or work financed by a private or public entity, including grants, rents, sponsorships and fellowships and received in a personal capacity or received by the person's institute to which they are associated, and falling within ECDC's remit. Research projects may be grouped together without stating the title of each project, provided that a relationship between them exists.

**Intellectual property rights** are to be interpreted as meaning rights granted to creators and owners of works that are the result of human intellectual creativity and that pertain to a domain falling within ECDC's remit. These can be publications or can be in the industrial, scientific, technological and/or artistic domain. They can be in the form of an invention, a manuscript, a suite of software, or a business name (e.g. copyrights, patents, trademarks, etc.).

**Other membership or affiliation** is to be interpreted as any membership or affiliation other than the above that can be perceived as an interest in the field of activity of the ECDC.

**Interests of household members** are to be interpreted as meaning that they include known interests (e.g. ownership of shares or other investments, employment, research funding, etc.) of household members in a domain falling within ECDC's remit. Household members are understood as family members and relatives belonging to the same household or under the care of the members of the household. In order to maintain privacy, their names do not need to be declared. The relationship (e.g. wife) should not be specified.<sup>8</sup>

**Other** is to be interpreted as meaning any activities or interests other than the above that could be perceived as an interest in an activity falling within ECDC's remit and/or which could be perceived as compromising the ability of the individual to act in an independent manner in the public interest. Such interests can include, for example, participation in activities supported by grants or contracts concluded in the framework of the EU Public Health Programme, if not declared elsewhere.

## **6. Roles assisting in the implementation of the Policy**

### ***6.1. Compliance Officer***

The Compliance Officer is the main function responsible for ensuring the correct implementation of the policies and procedures on declarations of interests in ECDC and is directly reporting to the ECDC Director. He provides advice to all staff in the Centre on the implementation of this policy and on the assessment of potential conflicts of interests.

The Compliance Officer is also responsible for ensuring that ADoIs, CVs and DoCs (if applicable) are published, on the ECDC website, where required. The Compliance Officer shall prepare an annual report on the implementation of the Independence Policy. This report shall summarise the work over the past 12 months and shall include, as a minimum, the total number of processed DoI's (including those with "no potential conflict"), the number and type of mitigation measures and any recommendations issued by the Declarations of Interests Review Committee.

### ***6.2. Declarations of Interest Review Committee***

The Declarations of Interests Review Committee is responsible for assessing and issuing a recommendation to the ECDC Director in cases where it is unclear whether or not a conflict of interest is present or in case of disagreement with a staff member on whether an interest may present a conflict.

The Declarations of Interests Review Committee is not responsible for a potential conflict of interest of the ECDC Director, which are handled by the ECDC MB according to the procedure set out in this Policy.

The composition of the Declarations of Interests Review Committee is as follows:

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<sup>8</sup> In addition to point IX, pursuant to Article 13 of the Staff Regulations, staff members have the obligation to inform the Appointing Authority if their spouse/partner is in gainful employment. In this respect, legally recognised partners are regarded in the same way as spouses pursuant to Article 1(2) c) of Annex VII to Staff Regulations. In case, the gainful employment of an spouse has already been declared, it will be indicated so in the DoI.



- The ECDC Director as Chairperson
- 4 Members:
  - the Compliance Officer;
  - a member of the Legal Services Section nominated by the ECDC Director;
  - another ad hoc member nominated by the ECDC Director;
  - a member nominated by the ECDC Staff Committee;

## 7. Summary of the Procedure

This policy sets out a three-stage procedure to assess the presence of potential conflicts: collect DoIs, review DoIs and assess any identified conflicts, and decide upon appropriate action to ensure the independence of ECDC both in the advice it provides and its day-to-day operations.

### 7.1. Collection

In accordance with the definitions set out in section 4 above, different types of DoI are used to identify and check potential conflict of interests. A first step in the process of checking for conflicts of interest is the collection of such DoIs.

It should be borne in mind that the DoIs represents a 'snap shot' of interests at a set moment in time. As a result, all staff members, including the director and the HoU, and SNEs are obliged to update their DoI without delay following any relevant change of circumstances.

### 7.2. Review and assessment

Declared interests do not automatically imply a conflict of interests. In order to determine whether an interest constitutes a conflict, a review and assessment is done using uniform criteria<sup>9</sup> that are consistently applied. In general, if no conflict of interest is noted, the appointing authority will take no measures and in case of an outside activity falling under the scope of Article 12b of the Staff Regulations, it will be permitted, provided that the conditions laid down by implementing rules on outside activities are met.

The following three risk categories are applied:

**Level A:** Involvement in all activities is in general permitted and no mitigation measures required. Having been employed by a public health institute or a similar, non-commercial organisation is not normally considered to be a conflict of interest. Having been employed by an academic institute or hospital is in general also not considered to be pose a conflict. However, previous involvement in the pharmaceutical industry, research grants and consultancy should be carefully examined to determine

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<sup>9</sup> The criteria are based on the definition of a conflict of interest in section 4.2 of this policy and further illustrated in the risk matrixes contained in section 9.2 of this policy (for the ECDC Director) and the Internal Procedure on Prevention of Conflicts of Interest for ECDC Staff.

the role of the staff member, the activities involved, whether remuneration was received, and any other relevant factors.

**Level B:** The level of involvement permitted for the individual will depend on:

1. Which ECDC activities are involved: general advice such as providing input into guidelines or presentations, versus involvement in specific matters, such as advice relating to diagnostic and/or pharmaceutical industries; specific risk assessments, etc; and
2. the nature of the input required, for example, input involving specific scientific expertise or strategy management are to be considered higher risk than for example, administrative or planning assistance; and
3. the role of the individual or the phase during which the person's involvement is required. This is to be interpreted as meaning what impact the individual can have as a result of his role in the activity (is he a key decision-maker or will he be influencing key decision-makers?), and at which stage in the relevant ECDC activity the individual shall provide input (for example, early information gathering phase versus final decision making phase.)

Mitigation measures may be taken for level B, depending on an analysis of each of the factors listed above. Such measures, if deemed to be required, could provide for partial restrictions, but not complete exclusion.

**Level C:** Exclusion of the concerned person from certain or all ECDC activities. This means that there can be no involvement whatsoever in the relevant activities identified, or in any ECDC activities at all. Commercial interests in the field of pharmaceutical and diagnostic tests are considered to be most high risk in terms of posing a conflict for ECDC and thus would most likely result in the person's exclusion, depending on the particular circumstances of the case<sup>10</sup>.

The above risk categories are applied in the review and assessment of an actual or potential conflict of interest on recruitment or during the service.

### ***7.3. Further action: mitigation measures***

Once the interests have been reviewed and assessed, a decision will be made on participation in ECDC activities and any mitigating measures to be taken, if required. The presence of a conflict of interests shall always lead to mitigation measures in the light of the risk level.

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<sup>10</sup> For the candidate, the exclusion from all ECDC activities means not being recruited. The staff member to whom the Staff Regulations apply should not keep or acquire any interest of such a kind or magnitude as to impair his/her independence in the performance of his/her duties (Article 11a, paragraph 3 of the Staff Regulations). Therefore, the staff member cannot keep or acquire any interest susceptible of being classified as level C and that would entail his/her exclusion from all ECDC activities, in which case disciplinary measures (including removal from the post) may be taken.

## **8. Who shall declare and what declarations and other documents need to be submitted?**

### ***8.1. Director and Heads of Unit (HoU) of ECDC***

Pursuant to Article 19(1) of the Founding Regulation, the Director shall undertake to act in the public interest. This obligation is applicable also to the HoU.

Pursuant to Article 11a of the Staff Regulations, the Director and the HoU are requested not to involve themselves in any activity that may result in a conflict of interest.

Therefore, in addition to the DoI completed upon their recruitment, the Director and the HoU shall annually submit an ADoI and make an ADoC to act independently in the public interest. The ADoI shall be updated upon any relevant change of circumstances.

The Director and the HoU shall submit their completed ADoI and ADoC electronically in the format and using the tools provided by ECDC. The responsibility for updating the ADoI lies exclusively with the individual.

The Director and the HoU shall also make SDoI and ODoI as described point 4.4 b) and c) of this Policy.

The Director and the HoU must also annually submit an updated Curriculum Vitae (CV)<sup>11</sup>.

### ***8.2. Other ECDC staff members, SNEs and trainees***

When a recruitment procedure is carried out, the successful candidate will be required to complete a DoI. Such DoIs shall be filled in and submitted to ECDC before appointment.

ECDC staff members, when appointed, are also informed of the need to follow the ECDC Code of Good Administrative Behaviour and any obligations that are imposed on them by the Staff Regulations (see Articles 11 to 26) and their implementing rules.

The Director shall make an annual decision with regards to which categories of staff (including SNEs and trainees) will have to submit an ADoI. Criteria to define such categories are the following:

- staff responsible for scientific outputs, such as ECDC Expert Opinions, (Rapid) Risk Assessments, Systematic Reviews, and Public Health Guidance documents.
- staff holding positions influencing the strategic choices of ECDC.

The respective ECDC staff, SNEs and trainees shall submit their completed ADoI electronically in the format and using the tools provided by ECDC. The responsibility for updating the ADoI lies exclusively with the individual.

The respective ECDC staff, SNEs and trainees shall also make SDoI and ODoI as described point 4.4 b) and c) of this Policy.

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<sup>11</sup> The CV should not contain unnecessary personal details, but would need to cover the professional career at least for the last 10 years. The Europass CV format is a good guideline regarding the contents to be covered.

The obligation to submit a DoI upon taking up their duties with ECDC applies also to SNEs and trainees. SNEs are additionally required to make a Declaration of Honour and are obliged to inform the relevant line manager of any change in circumstances related to a potential conflict of interest and update their DoI accordingly.

## **9. Processing of the DoIs, Annual Declaration of Commitment and CV of the ECDC Director**

### ***9.1. 9.1 Collection***

The Compliance Officer is responsible for requesting the Annual Declaration of Interest (ADoI), the Annual Declaration of Commitment (ADoC) and the CV from the ECDC Director.

### ***9.2. Review, assessment and mitigation measures***

The Compliance Officer is responsible for a preliminary review of the ADoI of the ECDC Director before transmitting a copy and a summary to the Chair of the MB. The Chair of the MB in consultation with the Compliance Officer if required, must review and assess the ADoI of the Director for potential conflicts of interest following submission and may recommend mitigation measures to the MB, if appropriate<sup>12</sup>. The MB reviews the recommendation of the Chair of the MB concerning any potential conflict of interest of the Director and decides on the need for mitigation measures. In addition, the Compliance Officer must check any declared interests in the ADoI against the draft Agenda prior to each board meeting and inform the Chair of the MB of the outcome of this check.

The MB decides on the necessary mitigation measures, if appropriate.

Complementary to the review of the ADoI's referred to in the preceding paragraph, at the opening of each MB meeting and after adoption of the agenda, a tour de table is conducted by the Chair of the MB in which the ECDC Director is asked to confirm that, based upon the agenda, he has nothing to add to the ADoI submitted. If the ECDC Director makes an ODoI not identified in the earlier DoI, this should be reviewed and assessed by the Chair of the MB, following consultation with the Compliance Officer as necessary, and recorded in the minutes together with any mitigation measures imposed by the MB.

The table below incorporates the risk analysis matrix to be applied when reviewing and assessing the interests declared by the ECDC Director, in order to determine whether any mitigation measures are required to be taken.<sup>13</sup>

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<sup>12</sup> If the results of the review reveal a conflict of interest requiring mitigation measures, these measures will be communicated by the chair in an email to the members and alternates involved, prior to the meeting.

<sup>13</sup> Note this is merely an indicative table. It is intended merely as a tool to assist in the review of interests in order to decide whether further action is necessary.

Engagement with ECDC: ECDC Director Risk analysis matrix										
Activities that may occur regularly	Commercial Interests	Managing Body	Scientific Advisory Body	Employment	Consultancy / Advice	Research Funding	Intellectual Property	Memberships / Affiliations	Other	Close family interests
Supply / verify data	C	A	A	A	B	A	A	A	B	A
Opinions / advice (more informal)	B	A	A	A	B	A	A	A	B	A
Review (official document)	B/C	B	B	A	B	B	B	A	B	B
Produce a document for decision	C	B	B	A	B	B	B	B	B	B
Decision taking	C	B	B	A	B	B	B	B	B	B

The letters A, B and C refer to the different risk categories.

- Level "A" should normally be considered as concluding there is no risk of conflict;
- Level "B" should be considered as concluding that a conflict is possible,
- Level "C" should normally be considered as concluding that there is a conflict.

## 10. Processing of the DoIs of staff other than the ECDC Director

### 10.1. Collection

The Human Resources Section is responsible for collecting and storing the DoIs upon recruitment of new staff according to Article 11(3) of the Staff Regulations, in addition to collecting and storing the DoH of SNEs.

The Compliance Officer is responsible for collecting ADoI, where these are required, and for forwarding them to the ECDC Director or relevant line manager (if review is delegated) for a first review.

In relation to the additional documentation to be collected from each HoU, namely their CV and DoC, the Corporate Governance section is responsible for their collection and processing.

### 10.2. Review, assessment and mitigation measures

The ECDC Director reviews the ADoIs of the HoU, taking into account the specific tasks that will be assigned to them. The ECDC Director or a delegated line manager reviews the ADoIs of other staff members, taking into account the specific tasks that will be assigned to the ECDC staff member.

Should the ECDC Director or the line manager suspect a potential conflict of interest, or is notified of one by the individual, he contacts the Compliance Officer to discuss the declared interests and the

(potential) conflict of interests with a view to identifying appropriate mitigation measures. Should there be any unclarity about the presence of a conflict of interest or the appropriate mitigation measures to take, the Declarations of Interest Review Committee may be convened to advise on the matter.

An indicative table of risk analysis matrix to be applied when reviewing the interests declared by staff members other than the ECDC Director in order to determine whether any mitigation measures require to be taken may be defined in an internal policy.

## **11. Implementation of this Policy - Internal Procedure**

The practical aspects of implementation of this Policy, including the templates for each type of DoI are set out in an internal ECDC procedure. A draft of the internal ECDC procedure will be shared with the MB for information and the MB shall be informed when significant changes are made to the internal procedure.

Moreover, the ECDC Director shall inform the MB at every MB meeting about the status of the implementation of this policy and once a year the result summarised shall be presented to the MB in the format of an annual report by the Compliance Officer.

## **12. Publication**

Taking into account the need for transparency as well as the importance of ensuring public trust, ADoI's, DoC and the CVs of the Director and HoU will be published on the ECDC website.

With regards to other ECDC staff members, only ADoI's of those staff members who are required to make an ADoI according to point 8.2, third paragraph, of this Policy and whose name appears on ECDC's website (e.g. Head of Disease Programmes, staff listed on the public organigram) will be published.

All the publications will respect the legislation in force and in particular the legislation on personal data protection.

The Compliance Officer shall be responsible for timely review and publication of the above declarations and CVs on the ECDC website once they are received. ADoI's may be published as received by ECDC. If during a subsequent review of the ADoI, the accurateness and/or completeness of the declaration is challenged, the published ADoI shall be replaced with an updated ADoI once this has been received by ECDC.

## **13. Application**

The Policy set out in this document replaces the policy defined in MB26/11 Rev.1.

It shall apply as from the day following that of its adoption.

## 14. Abbreviations

EU - European Union

ECDC - European Centre for Disease Prevention and Control

MB - Management Board

AF - Advisory Forum

HoU - Head of Unit

SNE - Seconded National Expert

CoI - Conflict of Interest

DoI - Declaration of Interest

DoC - Declaration of Commitment

DoH – Declaration of Honour

ADoI - Annual Declaration of Interest

SDoI - Specific Declaration of Interest

ODoI - Oral Declaration of Interest

ADoC - Annual Declaration of Commitment

CV - Curriculum Vitae

Signed:

In Stockholm, on 20 December 2019

On behalf of the Management Board

A handwritten signature in blue ink, appearing to read 'Anni Virolainen-Julkunen', with a long horizontal flourish extending to the right.

Anni Virolainen-Julkunen

Chair of the ECDC Management Board