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EMCDDA policy for the prevention and management of conflicts of interest

Summary

The Common Approach endorsed by the European Parliament, the Council and the Commission in July 2012 (as attached to the Joint Statement on EU decentralised agencies signed by these three institutions, see annex 1) calls for the development and application in all EU decentralised agencies of a coherent policy on preventing and managing conflicts of interest concerning the members of the Management Board, whether or not they sit in a personal capacity, the members of the Scientific Committee and the agencies' Directors (see statements nr 11, 18 and 20 of the Common Approach in annex 2).

For this purpose and in line with the aforementioned Common Approach, the Commission adopted 'Guidelines on the prevention and management of conflicts of interest in EU decentralised agencies' on 10 December 2013 (see annex 3).

These Guidelines aim at supporting agencies, by providing a set of principles and tools that they should consider in order to develop their own conflict-of-interest policy, with due consideration given to the specific context in which each one of them operates, as well as their degree of exposure to the risk of conflict of interest.

In the preparation of these Guidelines, the European Commission conducted an extensive mapping exercise of existing rules and practices in all agencies, to identify the current state of play, as well as good practices. The Commission also took into account the main recommendations addressed to agencies in this area by the European Parliament (namely in the framework of the discharge process), the European Court of Auditors (in its Special Report nr. 15/2012 on 'Management of conflict of interest in EU selected agencies'), the EU Ombudsman (on the occasion of his visits to several agencies, as part of a programme launched in May 2011) and the Commission's Internal Audit Service, in its capacity as internal auditor also of the agencies.

On this basis the document below presents the EMCDDA policy for the prevention and management of conflicts of interest.

Decision

The Management Board approves the proposed policy. The Director will submit at a later stage the tools required for the implementation of this policy to the Management Board for endorsement.

EMCDDA policy for the prevention and management of conflicts of interest

1. Introduction and background

The Common Approach endorsed by the European Parliament, the Council and the Commission in July 2012 (as attached to the Joint Statement on EU decentralised agencies signed by these three institutions, which presents 66 conclusions/recommendations reflecting a common, legally non-binding approach — see annex 1) calls for the development and application in all EU decentralised agencies of a coherent policy on preventing and managing conflicts of interest concerning the members of the Management Board, whether or not they sit in a personal capacity, the members of the Scientific Committee and the agencies' Directors (see statements nr 11, 18 and 20 of the Common Approach, annex 2).

For this purpose and in line with the aforementioned Common Approach, on 10 December 2013 the Commission, as part of the implementation of the Roadmap on the follow-up to this Common Approach, adopted 'Guidelines on the prevention and management of conflicts of interest in EU decentralised agencies' (see annex 3).

These Guidelines aim at supporting agencies, by providing a set of principles and tools that they should consider in order to develop their own conflict-of-interest policy, with due consideration given to the specific context in which each one of them operates, as well as their degree of exposure to the risk of conflict of interest.

In the preparation of these Guidelines, the Commission conducted an extensive mapping exercise of existing rules and practices in all agencies, to identify the current state of play, as well as good practices. This mapping showed that all agencies have in place conflict-of-interest policies for their statutory staff, while many of them have also implemented specific rules or policies for those not bound by the Staff Regulations such as Management Board members and experts.

The Commission also took into account the main recommendations addressed to agencies in this area by the European Parliament (namely in the framework of the discharge process), the European Court of Auditors (in its Special Report nr. 15/2012 on 'Management of conflict of interest in EU selected agencies'), the EU Ombudsman (on the occasion of his visits to several agencies, as part of a programme launched in May 2011) and the Commission's Internal Audit Service, in its capacity of also internal auditor of the agencies.

The Commission worked closely with the agencies to prepare these Guidelines. In particular the network of the Heads of EU Agencies contributed to this preparation by gathering information about agencies' experiences and best practices in this field.

This document presents the EMCDDA policy for the prevention and management of conflicts of interest.

2. Objective and scope of the policy

In order to fulfil its tasks, the EMCDDA needs to have access to the highest level of expertise available in the areas of activity covered by its mandate and mission, as defined in its founding regulation.

This expertise is often extremely specialised and the possible choice of alternative expertise is not always available. It is therefore essential that the EMCDDA can still be given access to specialised experts, while being made fully aware of all interests involved and possible risks of conflict of interests (or appearance of conflict of interests), in order to act upon these risks.

The need to avoid conflicts of interest should not prevent the EMCDDA from collaborating with and seeking input from high-level experts. As the persons concerned are generally experienced and may

have interests arising out of their professional background and capacity, appearance of conflict of interest, cannot always be entirely avoided. The risks of actual or perceived conflicts of interest should be identified, evaluated and managed (see below). This is particularly relevant in areas where available expertise is limited. A fair, proportionate and timely handling of each case should therefore be ensured pursuant to a policy on prevention and management of conflicts of interest which reflects the perceived exposure of the agency to the relevant risks, taking into account the tasks entrusted to it.

With regard to the above, the present policy concerns the following actors:

- The members of the EMCDDA Management Board, including members without voting rights, their substitutes and observers.
- The members of the EMCDDA Scientific Committee who are appointed in a personal capacity and shall give their opinions independently of EU Member States and EU institutions. This group includes also the members of the extended Scientific Committee, as appointed pursuant to Article 13 of the EMCDDA founding regulation.
- The Director and the staff of the EMCDDA, pursuant to the relevant provisions of the Staff Regulations and Conditions of Employment of Other Servants (CEOS), as well as in accordance with the Financial regulation applicable to the EMCDDA, including the implementing rules and procedures put in place for this purpose.
- The seconded national experts, trainees, interim staff and visiting experts at the EMCDDA.

3. Definitions

A conflict of interest generally refers to a situation where it can be reasonably considered that the impartiality and objectivity of an assessment, opinion, recommendation or decision of the agency is or might be perceived as being influenced, compromised or biased by a personal interest held or entrusted to a given individual.

Relevant personal interest may be of financial or non-financial nature and it may concern a personal or family relationship or professional affiliations (including additional employment or 'outside' appointments or former employments or appointments) and other relevant outside activities.

Not only actual independence but also perception of independence is important, since this issue can impact on the agency's reputation by raising doubts about the conclusions reached. The appearance of conflict of interest can constitute a reputational risk to the agency, even if it turns out to be unsubstantiated.

Therefore, giving due consideration to proportionality, to specific backgrounds and to all relevant facts and mitigating circumstances, a risk of perceived conflict of interest should be treated as if it were a risk of actual conflict of interest.

4. Agency's exposure to conflict of interest and risk assessment

The degree of exposure of the EMCDDA to the risk of actual or perceived conflict of interest can be considered low taking into account in particular the following factors:

- Within the remit of its mandate, mission and tasks, the EMCDDA acts as a monitoring centre which does not have regulatory or inspection powers.
- Most of the members of the EMCDDA Management Board come from and are appointed by national administrations of EU Member States or by EU institutions as their representatives.

- The value of the contracts usually concluded by the EMCDDA to enlist the support of external technical expertise/services for the execution of its tasks can be considered as quite low: actually this amount rarely exceeds EUR 30 000 per contract/year and the average value per contract/year amounts to about EUR 10 000.
- The EMCDDA, as EU decentralised agency, is bound by the rules and procedures laid down by the EU legislation for the management and functioning of the EU institutions and bodies (namely Financial regulations; Staff regulations and Conditions of employment of other EU servants; Regulation on public access to documents; Regulation on protection of individuals with regard to the processing of personal data, Regulation on investigations of the European Anti-Fraud Office). In this context the EMCDDA activities and its decision making processes are submitted to regular scrutiny by means of a considerable number of external ex ante and ex post controls, in particular by the EU Budget Authority (budget and discharge process), the European Court of Auditors (external audit), the European Commission (internal audit and agreement on financial and HR rules), the European Data Protection Supervisor, the European Anti-Fraud Office (OLAF), the European Ombudsman, the EU Civil Service Tribunal, the Court of First Instance and the Court of Justice.

5. Measures and procedures concerning the members and observers of the EMCDDA Management Board

Bearing in mind the legal rights of individuals in relation to personal data protection, in particular Regulation (EC) No 45/200, the names and the Curriculum Vitae, or a summary of the professional experience, of the members of the EMCDDA Management Board, their substitutes and the observers who regularly attend the meetings of the Management Board (hereinafter referred to as the observers) will be published on the EMCDDA website, together with the name of their employer(s) or any organisation which pays them ⁽¹⁾.

The final agendas and the final minutes of the meetings of the Management Board shall be published on the EMCDDA website, with the exception of the minutes of restricted sessions, pursuant to the relevant rules of procedure of the Management Board.

The list of participants to the meetings of the Management Board, any declaration of interests made by anyone of the attendees and the consequent possible decision to abstain or step down or to exclude some of the attendees from the discussion and/or decision on some items of the agenda, will also be published on the EMCDDA website.

5.1. Declaration of interest

Upon nomination, the members, their substitutes and the observers of the EMCDDA Management Board shall fill in a written declaration of interest covering both current and past interests or, if requested, their absence. Upon the introduction of this policy, existing members of the EMCDDA Management Board shall also fill in such a declaration. The reference period for past interests should cover the five years preceding the date of the declaration.

The declarations of interest should at least include the following information on all interests that are, or could be perceived as, related to the domain of activity of the EMCDDA:

- Posts currently held, i.e. at the date of the declaration, and post(s) held over the last five years in foundations or similar bodies, educational institutions, companies or other organisations (the nature of the post and the name of those bodies should also be indicated); other membership/affiliation or professional activities held over the aforementioned period, including services, liberal professions, consulting activities.
- Direct financial interests (managerial stakes in companies, including ownerships of patents or any other relevant intellectual property rights), or assets (shares and/or securities held in companies) or grants or other funding which might create a conflict of interests in the

⁽¹⁾ For stakeholders representatives, listing the organisation represented would suffice.

performance of duties, with an indication of their number and value, as well as the name of the company/provider of the grant/funding.

- Spouse's/partner's/dependent family members' current activity and financial interests that might entail a risk of conflict of interest.
- Any other relevant interests.

The persons concerned will be responsible for their own declarations and will bear an individual responsibility for disclosing their interests. They will be directly responsible for updating the declarations of interest whenever their situation changes in respect of the interests declared. They will have the primary responsibility for spontaneously declaring any conflicts of interest at all times, with special attention to any interests which might be considered prejudicial to their independence in relation to the items on the agenda of a meeting that they have to attend.

The declarations of interest will be made available for public scrutiny on the EMCDDA website, with due respect to EU rules on protection of personal data.

Without prejudice to the abovementioned individual responsibility and depending on the development of the exposure of the EMCDDA to the risk of conflicts of interest, the EMCDDA Management Board, may, if deemed necessary:

- Request that its members, including their substitutes and observers submit an updated declaration of interest.
- Request that its members, including their substitutes, and observers make an oral or written statement with regard to the agenda, or specific items of the latter, ahead of or during each (or a given) meeting of the Management Board and of the Executive and Budget Committees of the latter, in order to avoid the risk of a biased deliberation or decision or the appearance of conflict of interests. If interests are declared ahead of or during a meeting, the identified situation should be stated in that meeting's minutes along with the appropriate follow-up.

Upon proposal by the EMCDDA Director, the EMCDDA Management Board will approve the tools to be used for the aforementioned declarations of interest.

5.2. Identification of conflict of interest and preventive action

The declaration of interest of each member, its substitute and observer of the Management Board shall not imply by itself the existence of any conflict of interest. Declaring an interest shall not necessarily mean having an actual or potential conflict of interest, nor shall it automatically disqualify a person from participating in the activities of the EMCDDA.

The EMCDDA Director shall check the completeness of the information provided in each declaration of interest and screen its content in order to promptly refer to the Management Board about the possible existence or risk of actual or perceived conflict of interest, so that the latter can take the necessary action.

In case of conflict of interest, or in case a risk of actual or perceived conflict of interest is identified, the Management Board shall take the decisions and actions required to ensure that the person concerned:

- either gives up the conflicting personal interest
- or pulls out from decisions and, if appropriate, preparatory works for which such a conflict may arise
- or is excluded, totally or partially, from participating in the decision-making processes and activities likely to be affected by the identified situation of conflict of interest.

In particular, and depending on the level of exposure to the risk of conflict of interest, the Management Board may decide that the person concerned: may not be part of the Management

Board and/or of the Executive and Budget Committees of the latter; may not be appointed as or play the role of chairperson, vice-chairperson or rapporteur; may not participate in some decision or vote and, if appropriate, in the discussion and deliberations leading to that decision or vote. These restrictions should be made publicly available.

5.3. Breach of trust and remedial action

The Management Board shall take appropriate decision and action in case of breach of trust, i.e. failure of one of its members, substitutes or observers to declare an actual or potential conflict of interest or to comply with the EMCDDA policy on conflict of interest. In particular this may include the following remedial actions:

- a letter of reprimand
- the duty to resign or the request for resignation
- the request for revocation of the nomination by the responsible authority.

The appropriate remedial action should take duly into account the possible reasons for the failure to declare (e.g.: intentional omission, negligence, justified lack of knowledge, for example due to confidentiality connected to the profession of the household member involved) and should allow for the protection of the right of defence of the person concerned. The latter will have the possibility to ask for a review of the remedial measure, by providing the necessary supporting information and documents. The Management Board shall decide on this request.

If the person concerned was involved in a decision-making process of the EMCDDA Management Board, or of the Executive and Budget Committees of the latter, without having declared a conflicting interest, the Management Board may decide to review or cancel the decision adopted as a result of this process, in case it considers that this decision has been seriously affected by the identified conflict of interest.

6. Measures and procedures concerning the members and observers of the EMCDDA Scientific Committee and of the extended Scientific Committee

Pursuant to the relevant provisions of the EMCDDA founding regulation, the actors at stake:

- shall be appointed in view of their scientific excellence and their independence by the Management Board
- shall be appointed in a personal capacity and shall give their opinions completely independently of the EU Member State and EU institutions.

In this context the members of the EMCDDA Scientific Committee, including the additional members of the extended Scientific Committee and the observers who regularly attend the meetings of these bodies (hereinafter referred to as the observers), shall act in the best possible interests of the EMCDDA and its mission, independently from any academic, institutional, industrial, political or other specific interests they might have.

The EMCDDA recognises that the expertise of the aforementioned actors is crucial for the fulfilment of its tasks and that the quality of such expertise is inherently based upon prior and current academic and professional experience. These actors should therefore be able in principle to combine their participation in the activities of the EMCDDA Scientific Committee with other positions or activities, public or private, unless it can be reasonably considered that the impartiality and objectivity of their assessments, opinions, recommendations or decisions is or might be perceived as being influenced, compromised or biased by a personal interest linked to these positions/activities.

In line with the legislative provisions concerning the protection of personal data, in particular Regulation (EC) No 45/2000, the name and the Curriculum Vitae of the members of the EMCDDA Scientific Committee, including the additional members of the extended Scientific Committee and the observers, will be published on the EMCDDA website, together with the name of their employer(s) or

any organisation which pays them ⁽²⁾.

The final agendas and the final minutes of the meetings of the EMCDDA Scientific Committee and of the extended Scientific Committee shall be published on the EMCDDA website, as well as the list of participants to these meetings, any declaration of interests made by anyone of the attendees and the consequent possible decision to abstain or step down or to exclude some of the attendees from the discussion and/or decision on some items of the agenda.

6.1. Declaration of independence

Upon appointment, each member of the EMCDDA Scientific Committee, including each additional member of the extended Scientific Committee and each observer, shall sign a declaration of independence in relation to the performance of his/her duties in and for these bodies.

Upon proposal by the EMCDDA Director, the EMCDDA Scientific Committee will approve the tools to be used for the aforementioned declaration.

6.2. Declaration of interest

Upon appointment, each member of the EMCDDA Scientific Committee, including each additional member of the extended Scientific Committee and each observer, shall fill in a written declaration of interest covering both current and past interests or, if requested, their absence. Upon the introduction of this policy, existing members of the EMCDDA Scientific Committee shall also fill in such a declaration. The reference period for past interests should cover the five years preceding the date of the declaration.

Declarations of interest should at least include the following information on all interests that are, or could be perceived as, related to the domain of activity of the EMCDDA:

- Posts currently held, i.e. at the date of the declaration, and post(s) held over the last five years in foundations or similar bodies, educational institutions, companies or other organisations (the nature of the post and the name of those bodies should also be indicated); other membership/affiliation or professional activities held over the aforementioned period, including services, liberal professions, consulting activities, membership of governing or scientific advisory bodies, membership of editorial boards.
- Direct financial interests (managerial stakes in companies, including ownerships of patents or any other relevant intellectual property rights), or assets (shares and/or securities held in companies) or grants or other funding which might create a conflict of interests in the performance of the duties, with an indication of their number and value, as well as the name of the company/provider of the grant/funding.
- Spouse's/partner's/dependent family members' current activity and financial interests that might entail a risk of conflict of interest.
- Any other relevant interests.

The persons concerned will be responsible for their own declarations and will bear an individual responsibility for disclosing their interests. They will be directly responsible for updating the declarations of interest whenever their situation changes in respect of the interests declared. They will have the primary responsibility for spontaneously declaring any conflicts of interest at all times, with special attention to any interests which might be considered prejudicial to their independence in relation to the items on the agenda of a meeting that they have to attend.

The written declarations of interest will be made available for public scrutiny on the EMCDDA website, with due respect to EU rules on protection of personal data.

Without prejudice to the abovementioned individual responsibility and depending on the development of the exposure of the EMCDDA to the risk of conflicts of interest, the EMCDDA Scientific Committee may request, if deemed necessary, that its members, including the additional members of the

⁽²⁾ For stakeholders representatives, listing the organisation represented would suffice.

extended Scientific Committee and the observers:

- submit an updated declaration of interest.
- make an oral or written statement with regard to the agenda, or specific items of the latter, ahead of or during each (or a given) meeting of the Scientific Committee or of the extended Scientific Committee, in order to avoid the risk of a biased deliberation or decision or the appearance of conflict of interests. If interests are declared ahead of or during a meeting, the identified situation should be stated in that meeting's minutes along with the appropriate follow-up.

Upon proposal by the EMCDDA Director, the EMCDDA Scientific Committee will approve the tools to be used for the aforementioned declarations of interest.

6.3. Identification of conflict of interest and preventive action

The declaration of interest of each member of the EMCDDA Scientific Committee, including each additional member of the extended Scientific Committee and each observer, shall not imply in itself the existence of any conflict of interest. Declaring an interest shall not necessarily mean having an actual or potential conflict of interest, nor shall it automatically disqualify a person from participating in the activities of the EMCDDA.

The EMCDDA Director shall check the completeness of the information provided in each declaration of interest and screen its content in order to promptly refer to the EMCDDA Scientific Committee about the possible existence or risk of actual or perceived conflict of interest, so that the latter can take the necessary action.

In case of conflict of interest, or in case a risk of actual or perceived conflict of interest is identified, the EMCDDA Scientific Committee shall take the decisions and actions required to ensure that the person concerned:

- either gives up the conflicting personal interest
- or pulls out from decisions and, if appropriate, preparatory works for which such a conflict may arise
- or is excluded, totally or partially, from participating in the decision-making processes and activities likely to be affected by the identified situation of conflict of interest.

In particular and depending on the level of exposure to the risk of conflict of interest, the EMCDDA Scientific Committee may conclude that the person concerned: may not be part of the Scientific Committee; may not be appointed as or play the role of chairperson, vice-chairperson or rapporteur; may not participate in some decision/vote and, if appropriate, in the discussion and deliberations leading to that decision/vote. These restrictions should be made publicly available.

6.4. Breach of trust and remedial action

The Scientific Committee shall take appropriate decision and action in case of breach of trust, i.e. failure of one of its members, including the additional members of the extended Scientific Committee and the observers, to declare an actual or potential conflict of interest or to comply with the EMCDDA policy on conflict of interest. In particular this may include the following remedial actions:

- a letter of reprimand
- the duty to resign or the request for resignation
- the request for revocation of the nomination by the responsible authority.

The appropriate remedial action should take duly into account the possible reasons for the failure to declare (e.g.: intentional omission, negligence, justified lack of knowledge, for example due to confidentiality connected to the profession of the household member involved) and should allow for the protection of the right of defence of the person concerned. The latter will have the possibility to

ask for a review of the remedial measure, by providing the necessary supporting information and documents. The Scientific Committee shall decide on this request.

If the person concerned was involved in a decision-making process of the EMCDDA Scientific Committee, or of the extended Scientific Committee, without having declared a conflicting interest, the Scientific Committee may decide to review or cancel the decision adopted as a result of this process, should it consider that this decision has been seriously affected by the identified conflict of interest.

7. Measures and procedures concerning the EMCDDA Director and staff

The EMCDDA Director and staff members are subject to the EU Staff Regulations (SR) and to the Conditions of Employment of Other Servants of the EU (CEOS), as well as to the rules adopted by the EMCDDA to implement these regulations. Pursuant to these regulations and rules they are obliged to carry out their duties independently, objectively, impartially and in keeping with their duty of loyalty to the EU and the EMCDDA. In particular:

- a staff member shall carry out his/her duties and conduct him/herself solely with the interest of the agency in mind (cf. Art. 11 SR);
- a staff member shall neither seek nor take instructions from any government, authority, organisation or person outside his/her agency (cf. Art. 11 SR);
- a staff member shall not without the permission of the agency accept any honour, decoration, favour, gift or payment (cf. Art. 11 SR);
- a staff member shall inform the agency of any potential conflict of interests due to any personal interest before his/her recruitment or at the end of the unpaid leave period (cf. Art. 11 SR);
- a staff member shall not deal with a matter in which, directly or indirectly, he/she has any personal interest such as to impair his/her independence (cf. Art. 11a SR);
- a staff member shall refrain from any action or behaviour which might reflect adversely upon his position (cf. Art. 12 SR);
- a staff member shall inform his/her agency if his/her spouse is in gainful employment (cf. Art. 13 SR);
- a staff member shall notify his/her agency if he/she intends to stand for public office (cf. Art. 15 SR);
- a staff member shall refrain from any unauthorised disclosure of information received in the line of duty including after leaving the service (cf. Art. 17 and 19 SR);
- a staff member shall inform his/her agency of his/her intention to engage in an outside activity (cf. Art. 16 and 40 SR). In this case three situations are possible:
 - When a staff member is on active employment, if he/she wishes to engage in an outside activity, whether paid or unpaid, or to carry out any assignment outside the agency, he/she shall first obtain the permission of the EMCDDA Appointing Authority (Director). Permission shall be refused if the activity or assignment in question is such as to interfere with the performance of the official's duties or is incompatible with the interests of the agency.
 - When a staff member wishes to engage in an outside activity during his/her unpaid leave, the same conditions apply. In addition and more strictly, the permission shall not be granted to a staff member for the purpose of his/her engaging in an occupational activity, whether gainful or not, which involves lobbying or advocacy vis-à-vis his/her agency and which could lead to the existence or possibility of a conflict with the legitimate interests of the agency.
 - A staff member shall, after leaving the service, continue to be bound by the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits. Staff members intending to engage in an occupational activity, whether gainful or not, within two years of leaving the service shall inform the agency thereof using a specific form. If that activity is related to the work carried out by the staff member during the last three years of service and could lead to a conflict with the legitimate interests of the agency, the EMCDDA Appointing Authority (Director) may, having regard to the interests of the service, either forbid him/her from undertaking it or give approval subject

to any conditions it thinks fit.

In the case of former agencies' Directors, the Management Board shall, in principle, prohibit them, during the 12 months after leaving service, from engaging in lobbying or advocacy vis-à-vis staff of their former agency for their business, clients or employers on matters for which they were responsible during their last three years of service.

Furthermore the Financial regulation applicable to the EMCDDA prohibits staff members from taking any measures of budget implementation which may bring their own interests into conflict with those of the EMCDDA and of the European Union. In this context any staff member who is involved in the management of EMCDDA procurement processes (namely evaluation of tenders) is required to complete and sign a declaration of absence of conflict of interest and shall resign from the assigned tasks should such a conflict exist.

In parallel, each contract concluded by the EMCDDA provides for clauses that ensure that the contractor shall take all necessary measures to prevent any situation that could compromise the impartial and objective performance of the Contract.

Pursuant to the relevant provisions of its founding regulation and in line with the relevant Staff and Financial regulations applicable to the EMCDDA, the latter adopts and puts in place the rules and procedures required for the implementation of the aforementioned provisions (or adjusts, as required, the ones already adopted/in place). This includes actions to raise awareness and ensure appropriate communication with the concerned actors.

Within the limits set by the legislative provisions concerning the protection of personal data, in particular Regulation (EC) No 45/200, the Curriculum Vitae of the EMCDDA Director will be published on the EMCDDA website.

8. Measures and procedures concerning seconded national experts, trainees, interim staff and visiting experts at the EMCDDA

The aforementioned measures and procedures concerning the EMCDDA Director and staff shall apply by analogy to the seconded national experts, trainees, interim staff and visiting experts at the EMCDDA.

9. Transparency, implementation, communication and review of the policy

The present policy, as adopted by the EMCDDA Management Board will be published on the EMCDDA websites in a clear and easily identifiable manner.

The EMCDDA Director shall ensure the implementation of the policy.

Adequate actions for communication, awareness-raising and training will be organised, as required, to ensure effective understanding and implementation of this policy.

The EMCDDA annual General report of activities will refer to the implementation of the policy.

The effectiveness of the adopted policy should be regularly assessed, in order to adjust it as required.