ECDC Management Board

Forty-second Meeting

Stockholm, 20-21 March 2018

Revised Independence Policy for Non-Staff

Document number: MB42/04b Rev.1	**Date: 5 March 2018**
Summary:	In July 2016, the Management Board (MB) approved a revised independence policy document which included major changes in the way conflict of interest is handled at ECDC. After guidance received from DG HR, the independence policy endorsed by the MB has been split into two separate documents, one covering non-staff, the other covering ECDC staff. Both apply the same principles as applicable to the differenct categories of person. While the policy applicable to non-staff has remained unchanged in substance, a few minor revisions of wording have been made to ensure consistency with the policy applicable to staff. The main elements of the policy are: - The document contains provisions for processing of declarations for processing Declarations of Interest of those contributing to the work of ECDC who are not staff. - The policy also provides for the delegation of its practical implementation to the ECDC Director. - The ECDC Director will implement the practical aspects of the policy via an Internal Procedure; the MB is updated on significant changes in this procedure.
Action:	Approve the draft Independence Policy for Non-Staff.

Background:	Regulation (EC) No 851/2004 establishing the European Centre for Disease Prevention and Control (ECDC), in particular, Article 19 Financial Regulation of the European Centre for Disease Prevention and Control and its implementing rules, adopted by the Management Board on 28 March 2014 ECDC Code of Good Administrative Behaviour Regulation (EC) N° 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data

Summary

1. The European Parliament, in its scrutiny of the activities of EU Agencies has insisted that they take active steps to identify and manage actual or potential conflicts of interest, and demonstrate their independence. Over the past years more attention has been devoted within DG SANTE and the sister agencies European Food Safety Authority (EFSA), European Medicines Agency (EMA) and the European Monitoring Centre for Drugs and Drug Abuse (EMCDDA) to further develop good practices to manage conflict of interests.
2. In 2012 a draft independence policy was adopted by the Management Board of ECDC (MB). That policy codified existing good practice in ECDC and upgraded it to bring it into line with the emerging consensus on best practice in ensuring transparency, independence and excellence in EU scientific agencies. In 2016 a revised Independence Policy has been endorsed by the Management Board.
3. The policy has since been split into two documents, with one document covering non-staff, including Management Board (MB) and Advisory Forum (AF), and the other covering ECDC staff, including the senior management team (SMT) and the director. Both apply the same principles as applicable to the differenct categories of persons. This document covers non-staff.
4. Of particular interest are the following points:
    - The revised policy recognises the need for transparency by clarifying which declared interests will be published.
    - The document describes the principles of ECDC's independence policy, including the review and mitigation measures for the Management Board of ECDC.
    - The policy provides explicit reference about the delegation to the ECDC Director and the practical implementation of the policy via an ECDC Internal Procedure.

    Adjustments in the procedure for experts for reviewing rapid risk assessments are introduced.

Annex: ECDC Independence Policy for Non-Staff

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1. Purpose

As stated in ECDC's Founding Regulation[1], "*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 consumers can have confidence in the scientific quality and integrity of work.

b. Independence: an essential element to ensure independence from the influence of industry, other stakeholders and lobby groups, 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 independence but also the perception of independence is important, since it can impact upon ECDC's reputation.

c. Excellence: all experts involved in developing opinions, guidance, advice and recommendations should be appointed/contracted on the basis of proven scientific excellence and commitment.

The Independence 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

This policy applies to members and alternates of the ECDC Management Board (MB) and Advisory Forum (AF), other individuals working on behalf of ECDC, including interims, as well as contractors and external experts 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. This policy does not cover ECDC staff members that are subject to the provisions of the EU Staff Regulations and Conditions of Employment of Other Servants of the European Union[2], which includes the ECDC Director and the members of the Senior Management Team (SMT). There is a separate policy and internal procedure which applies to ECDC staff members.

3. Legal basis

- Regulation (EC) No 851/2004 establishing the European Centre for Disease Prevention and Control (ECDC), in particular, Article 19.
- Financial Regulation of the European Centre for Disease Prevention and Control and its implementing rules, adopted by the MB on 28 March 2014.
- ECDC Code of Good Administrative Behaviour.

1. 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.

2 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.

- Regulation (EC) N° 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data.

4. Definitions

4.1 Conflict of Interests (CoI)

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 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/her activities for ECDC.

4.2 Declaration of Commitment (DoC)

A Declaration of Commitment constitutes a written undertaking to act in the public interst and independently of any external influence. Such delaration Declaration of Commitment shall be made annually in writing by members of the AF and the MB.

4.3 Declaration of Interests (DoI)

In general terms, a DoI is a formal notification of an individual's interests and is used to identify any 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:

1) Annual Declaration of Interests (ADoI)

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An ADoI is the standard format for DoIs. It allows declaration of relevant interests that may give rise to a potential 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, their direct family members. ADoIs are updated on a yearly basis. ADoIs are made in writing.

2) Specific Declaration of Interests (SDoI)

The 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 for ad hoc meetings when the time for usual collection of the ADoI is too short (e.g.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.

3) Oral Declaration of Interests (ODoI)

The ODoI may be required at the beginning of a meeting or discussion, after consideration of all agenda items or issues for discussion. In making this declaration, an individual will notify any additional interests or change in circumstances which must be recorded.

5. Which interests should be declared?

Details of any involvement in the activities listed below shall be declared in all types of DoI. These activities can be current or past (five years prior to the declaration).

Nature of the activities:

I. **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.

II. **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.

III. **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).

IV. **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.

V. **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.

VI. **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.

VII. **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.).

VIII. **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.

IX. **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 by 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.

X. **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/She 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 Declarations of Commitment (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 DoIs (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 on whether an interest may present a conflict. It shall not be involved in the review of Declarations of Interest for the MB.

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

- A Chairperson that will be:
    - for members of the AF: the Chair of the AF;
    - for Scientific Advice, Guidance and Panels: the Chief Scientist (or relevant HoU in case of network or expert meetings).
    - for other non-statutory personnel working at ECDC (e.g interims): the ECDC Director;

- 4 additional Members:
    - the Compliance Officer;
    - a member of the Legal Services Section nominated by the ECDC Director;
    - two ad hoc members nominated by the Director

7. Summary of the Procedure

The policy supports 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[3].

7.1 Collection

In accordance with the definitions set out in section 4 above, different types of Declarations of Interests (DoI) are used to 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 individuals covered by this policy 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[4] that are consistently applied. In general, if no conflict of interest is noted, participation in all activities is permitted.

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 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 their role in the activity (are they a key decision-maker or will they be influencing key decision-makers?), and at which stage in the relevant ECDC activity the individual shall input to (for example, early information gathering phase versus final decision making phase.)

[3] Note that references to appendices through the Independence Policy refer to those annexed to the relevant Internal Procedure associated with this policy. The appendices contain the templates to be used in connection with its implementation.
[4] The criteria are based on the definition of a conflict of interest and further illustrated in the risk matrixes contained this policy.

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, will 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.

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.

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

8.1 Members of the Management Board (MB) and Advisory Forum (AF)

Members and alternates of the MB and AF shall use their best efforts to refrain from involving themselves in any activity that may result in a conflict of interest and shall act independently in the public interest. Members and alternates of the MB and AF shall make an Annual Declaration of Commitment (ADoC) to act independently in the public interest. Members and alternates of the MB and AF also make an ADoI in which they declare whether or not they have any interest which might be considered to have a bearing on their independence. The members and alternates shall immediately inform the Compliance Officer and the Chair of the MB or AF respectively of any changes in their interests. Members and alternates of the MB and AF are requested to 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. Members and alternates of the MB and AF should annually submit an updated Curriculum Vitae (CV).

8.2 Interims, contractors and beneficiaries of grants

Interims, contractors and beneficiaries of grants are linked to ECDC by contract or grant agreement, which includes a standard clause regarding conflicts of interest. Submission of ADoIs may additionally be required as part of the selection criteria for the award of the contract. If the line manager or project manager respectively has reason to believe that interests falling within the ECDC remits exist, he/she shall contact the Compliance Officer for advice as soon as possible. The Compliance Officer will make the necessary enquiries advise on the appropriate action to be taken.

8.3 External Experts

In accordance with Article 19 of the ECDC Founding Regulation, experts asked to participate in activities to provide advice which may influence ECDC's scientific position shall submit an ADoI. ECDC reserves

the right to request participants to a specific activity to submit an SDoI in advance of this activity, when considered necessary due to the particular nature of the activity. Additionally and where relevant, an ODoI shall be made before the start of each meeting.

External experts are requested to submit their completed ADoI electronically in the format and using the tools provided by ECDC. The responsibility for submitting and updating the ADoI lies exclusively with the individual. The responsibility to collect and assess all AdoIs from experts participating in the activity lies with the staff member responsible for the organization of the activity in ECDC;

Accordingly, all experts asked to review a Rapid Risk Assessment (RRA) should have submitted a valid ADoI. If the selected expert has not submitted an ADoI earlier or if the period of validity of such ADoI has expired, a short version of a DoI form will be sent for submission together with the RRA the expert is asked to review. If this short version is not filled in, the expert's opinion will not be taken into account. ECDC shall ensure that the scientific advice is not limited to a single expert. The appointed response duty officer of the RRA will complete a form to document the assessment carried out and submit a copy to the Compliance Officer. The Compliance Officer will provide support and an update on these activities in the annual report to the Director.

9. Processing of the DoIs, Declaration of Commitment and CV of the Management Board

9.1 Collection

The Compliance Officer is responsible for requesting the ADoI, the Annual Declaration of Commitment (ADoC) and a CV from the members and alternates of the Management Board. A reminder is included in the email requesting submission of the declarations, that, additionally, ODoIs are to be collected at the beginning of the meeting.

The ADoI, ADoC and CV are submitted by the individual to ECDC a minimum of two weeks prior to the beginning of each calendar year. Newly appointed members/alternates shall submit their ADoI, ADoC and CV immediately upon their appointment and at least 15 working days before the meeting. Corporate Governance section sends reminders to individuals who have failed to submit within the deadline at least three times via email, prior to the meeting. Members and alternates that fail to submit an ADoI and ADoC cannot participate in the meetings and therefore neither vote by proxy. They will also not be able to receive or access any documents submitted to the MB. The appointing authority will be informed on the missing declarations by the Chair of the MB.

After an ADoI, ADoC and/or CV has been received, the Compliance Officer authorises the publishing of the submitted documents on the ECDC website in accordance with the applicable Data Protection Regulations (Regulation (EC) No 45/2001). Corporate Governance Section arranges for the documents to be published.

9.2 Review and assessment

Following checks for completeness, the Compliance Officer is responsible for a preliminary screening of the ADoI of the members and alternates of the MB before transmitting a copy and a the outcome of a preliminary screening to the Chair of the MB. In case a (potential) conflict of interest is noticed, the Compliance Officer shall also provide an assessment of potential risks. On the basis of the preliminary screening, the Chair of the MB shall review the ADoI and decide on the need for further enquiries

and/or discuss with any members or alternates for whom he/she considers a conflict of interests may exist. The Chair will review the declarations based on the risk matrix below.

With regards to the Chair of the MB, his/her ADoI shall also be submitted to the Compliance Officer and shared with all members of the MB for review. They shall indicate whether or not they have identified any potential conflicts of interest to the Deputy Chair as well as to the Compliance Officer. If for the Chair of the MB a potential conflict of interest has been identified by the MB, further action may be taken by the MB with support of the Compliance Officer and/or legal advisor with a view to ensuring that the obligation on members of the MB to act in the public interest is met.

Complementary to the review of the ADoI's described in the preceding two paragraphs, the Compliance Offcer will check any declared interests in the ADoI against the draft Agenda prior to each MB meeting and inform the Chair of the MB of the outcome of this check. If the results of the review reveal a conflict of interest requiring mitigation measures, the Compliance Officer will adviser the Chair and the Chair will make a recommendation for the approval of the MB. Any measures will then be communicated by the Chair in an email to the members and alternates involved, prior to the meeting. At the opening of each meeting and after adoption of the agenda, a *tour de table* is conducted by the Chair of the MB in which each member is asked to confirm that, based upon the agenda, they have nothing to add or amend to the ADoI submitted. The ODoIs made at each meeting are recorded in the Minutes of the meeting. If a member makes an ODoI not identified in the earlier Declarations of Interest, this should be considered by the Chair of the meeting, following consultation with the Compliance Officer as necessary, and noted in the Minutes together with any mitigation measures imposed by the MB, following a recommendation from the Chair.

The risk evaluation matrices used for Management Board members and alternates are given below.

Engagement with ECDC: MB members and alternates
Risk analysis matrix

Activities that may occur regularly for the involvement in MB meetings and subcommittees	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.

9.3 Further action: mitigation measures

The mitigation measures to be taken shall depend on the assessment of the degree of exposure ECDC is subject to, as a result of the (potential) conflict of interest. Mitigation measures may vary from being present during the meeting without further participation or voting right, to exclusion from the meeting for the topic where a conflict of interest was noted.

The Chair of the MB shall forward his/her findings and recommendation first to all Board members for comments and subsequently to the Compliance Officer. Based upon this assessment further action may be taken by the MB with the support of the Compliance Officer and/or legal advisor with a view to ensuring that the obligation on members of the MB to act in the public interest is met[5]. The Chair of the MB will inform the member or alternate involved on the decision of the mitigation measures decided by the MB, as well as to the appointing authority of the Member State. Appeal of the decision can be made based on article 28 of the ECDC Founding Regulation. The mitigation measure will be noted in the minutes of the Management Board meeting.

10. Delegation to the ECDC Director

As the legal representative of the Centre and responsible for the day-to-day management of the Centre, the Director shall be entitled to adopt implementing rules to this policy. Such implementing rules shall take the format of a Director's decision on an internal ECDC procedure and other instruments (e.g. formats, IT tools) as appropriate. A draft of the internal ECDC procedure will be shared with the Management Board for information and the Management Board shall be informed when significant procedural changes are made. Moreover, the Director shall inform the Management Board 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.

The collection, review, assessment and mitigation measures relating to DoIs of actors covered by this policy **other** than members/alternates of the ECDC Management Board, is the responsibility of the Director of ECDC, with the support of the Compliance Officer and other responsible staff members. In case mitigation measures are taken for an AF member, the appointing authority of the Member State shall be informed.

11. Process regarding omissions and Breach of Trust procedure

Should it become apparent that information which should have been disclosed, has not been, then the individual shall be notified by the Compliance Officer of the opening of a Breach of Trust procedure. The Compliance Officer shall seek additional background information with regard to the information that was not declared, inviting an explanation for the non-disclosure and asking the individual to update the declaration. Upon request, the individual shall have access to all documents related to the procedure and shall be allowed to present written observations within seven calendar days.

Upon completion of an updated declaration, the relevant DoI shall be processed and screened in accordance with the standard procedure by the Compliance Officer. His/her findings will be referred to

[5] ECDC Founding Regulation 851/2004 Art.19 (1).

the Chair of the Management Board for members/alternates of the Management Board and the Director, and to the Management Board for the Chair of the Management Board; all other cases are referred to the Director and the Declarations of Interests Review Committee with any written observations from the individual.

In respect to members/alternates of the Management Board and the Director, the Chair of the Management Board, and in all other cases, the Director together with the Declarations of Interest Review Committee, shall determine a) if the information missing from the relevant DoI is a declarable interest according to ECDC's guidance; and/or b) there is evidence to suggest that the individual did not declare the missing information intentionally or through gross negligence. For members/alternates of the Management Board and the Director, the Chair will subsequently suggest appropriate measures to be taken to the Management Board Members and inform the appointing authorities. In all other cases, the Director will do so.

12. Publication

Taking into account the need of transparency as well as the importance of ensuring public trust, ADoI's, ADoCs and CVs of Members of ECDC's Management Board, and the Advisory Forum, will be published on the ECDC website, in accordance with Regulation (EC) No 45/2001 (the Data Protection Regulation)

With regards to external experts, in view of the direct impact that their work has on ECDC's scientific outputs and taking into account the need to ensure the independence of ECDC's scientific advice vis-à-vis the public, their ADoI's will be published, in accordance with the Data Protection Regulation, in order to allow for additional monitoring of their independence by the public and by their peers.

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 shall be published as received by ECDC, following their review. 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.

Non-staff completing an ADoI shall be informed of this publication via a Data Protection Notice provided at the time of completion of the ADoI. They have the right to object to the web publication of their personal data contained in the declaration, at any time, on compelling legitimate grounds relating to their particular situation. The Data Protection Notice outlines all their rights in terms of data protection law.

All DoI may need to be subject to disclosure upon request in accordance with Regulation (EC) No 1049/2001. Such requests will be handled according to ECDC's rules on access to documents (Decision MB 1/17).

13. Personal Data Protection provisions

DoIs shall be processed pursuant to Regulation (EC) N° 45/2001. All data subjects receive a Data Protection Notice, explaining the data processing operation undertaken and their associated rights. A copy of this notice is annexed to the internal procedure.

14. Entry into force

The policy set out in this document replaces the policy defined in MB26/11 Rev.1. The policy shall be reviewed within 24 months of its adoption. It shall enter into force the day after its adoption by the Management Board.

15. Abbreviations

EU – European Union

ECDC – European Centre for Disease Prevention and Control

MB – Management Board

AF – Advisory Forum

SMT – Senior Management Board

SNE – Seconded National Expert

CoI – Conflict of Interest

DoI – Declaration of Interest

DoC – Declaration of Commitment

ADoI – Annual Declaration of Interest

SDoI – Specific Declaration of Interest

ODoI – Oral Declaration of Interest

ADoC – Annual Declaration of Commitment

CV – Curriculum Vitae

RRA – Rapid Risk Assessment

Stockholm, 21 March 2018
On behalf of the Management Board

Daniel Reynders
Chair of the ECDC Management Board