



**COUNCIL OF
THE EUROPEAN UNION**

Brussels, 28 January 2013

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BUDGET 6
INST 43
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NOTE

from: General Secretariat of the Council
to: Delegations

Subject: Summary record of the meeting of the European Parliament **Committee on Budgetary Control (CONT)**, held in Brussels on 24 January 2013

The meeting was chaired by Mr THEURER (ALDE, DE).

Items 1 and 2 on the agenda

Mr THEURER (ALDE, DE) announced that a workshop on agencies would take place on 21 February 2013.

Item 3 on the agenda

2011 Discharge to Agencies

CONT/7/11595

Rapporteur: M. GERBRANDY (ALDE, NL)

- Exchange of views in the presence of the Directors of the following Agencies:
 - European Police College (CEPOL)
 - European Aviation Safety Agency (EASA)
 - European Banking Authority (EBA)
 - European Chemicals Agency (ECHA)
 - European Environment Agency (EEA)
 - European Food Safety Authority (EFSA)
 - European Medicines Agency (EMA)
 - European Railway Agency (ERA)
 - European Union Agency for Fundamental Rights (FRA)

Mr RUSSO, member of the European Court of Auditors, delivered the speech in Annex I.

Mr SPRENGER, Director of the European Centre for Disease Prevention and Control (ECDC), and coordinator of the Agencies' network, highlighted the role of the network in ensuring a high level of management and performance of the Agencies. He stated that the general concern for Agencies was that they were requested to deliver with fewer staff, while the administrative burden was increasing. He called for a simplification of the administrative rules applicable to the Agencies and welcomed the Commission Road Map published in December 2012 and, in particular, point IV, which addressed management of financial and human resources and the budgetary process. He assured the Commission of the support of the Agencies' network for the implementation of the Road Map. He noted that carryovers were the most recurring criticism addressed to Agencies and explained that these were inevitable, in particular for Agencies that did not receive a budget at the beginning of the year, and were financed through fees. Moreover, carryovers were a consequence of certain types of contract (he mentioned IT contracts) and he explained that framework contracts could not always be a solution. Reserves for staff salary adjustments also gave rise to some carryovers, and he mentioned the uncertainty regarding the date of the Court of Justice's ruling (the information that it would only be delivered in 2013 came too late to avoid a carryover).

The rapporteur underlined the key role of Agencies in performing tasks directly linked to the lives of citizens. They were now at the centre of a political debate following the adoption of a Common approach in July 2012 and of the Commission Road Map; moreover, a Special Report on conflicts of interest had been adopted by the CoA. He considered that the EP and the Council should start discussions on the future of the Agencies. He expressed the opinion that the Agencies' Network should be responsible for the coordination of all actions envisaged in the Road Map and suggested that a former executive Director be tasked to take up the lead. Concerning carryovers, he wondered whether Agencies could not apply the method applied by the Commission, which conducts a specific overview two or three times a year to prevent carryovers. As for staff rules, he expressed doubts as to whether the same rules that applied to the Commission should apply to Agencies, given their different staffing needs. He also questioned the improvements for Agencies resulting from certain actions in the Commission Road Map, and mentioned the rationalisation actions of actions 15 and 16 (sharing services and merging Agencies). More generally, he asked whether Agencies already applied the OECD rules on conflicts of interest, or which were the rules they applied.

Turning to individual Agencies, he inquired about the follow-up on conflicts of interest within EASA, EMA and EFSA , following the Recommendations of the CoA . He also asked whether MS paid their contributions to EBA regularly.

Mr SERVAMAA (EPP, FI) inquired about the administrative costs of EASA, and about the extension to family members of the declarations of interest required by the EFSA.

Ms AYALA SENDER (S&D, ES) considered that a general improvement in the management of agencies could be observed and he raised general issues such as the distribution of responsibility between the Commission and the Agencies, staff rules applicable to the Agencies, the distribution of resources amongst agencies in terms of workload, training provided to staff on the new Financial Regulation. She also raised specific issues relating to EBA, EASA, EFSA and CEPOL.

Mr FJELLNER (EPP, SE) raised a specific issue concerning the merging of CEPOL and considered that extra costs could arise. He also asked about whether EMA had any regulatory framework for the management of conflict of interests.

Ms BRZOBOHATA (S&D, CZ) asked about the number of experts at EBA. Ms MACOVEI (EPP, RO) posed specific questions regarding the seat of CEPOL, the declaration of interests at ECHA and EFSA, public procurement procedures at ENVI, the system of remuneration at EMA and alleged harassment cases at FRA. Ms ANDREASEN (EFD, UK) inquired about the administrative costs at EASA, the seat of CEPOL and the training courses at ENVI.

Mr BANFI, Director at CEPOL (European Police College), acknowledged a complicated situation at the beginning of his mandate but expressed general satisfaction regarding the current situation. He expressed some concern about the working conditions of staff, given that a decision on the seat of the Agency had not yet been taken. He stated that he had received a letter from the UK Home Secretary who expressed the desire that CEPOL move in March 2014, which he understood to be a termination of the Headquarters Agreement, as he wrote in his letter of reply to the Minister. He expressed some doubts about the proposal to merge the Agency with Europol, given the increasing demand for training.

Mr GOUDOU, Director at EASA (European Aviation Safety Agency), stated that the Agency had not waited for the CoA report before addressing the conflict of interests issue and recalled that a Code of conduct had been adopted in August 2011. In his view, the Code was fully in line with the requests from the CoA. Moreover, an Ethics Committee had been put in place and an appeal Committee for individual claims. He added that the Agency had not experienced conflicts of interests in the last 10 years.

Concerning administrative costs, he suggested that there was a problem defining the nature of certain types of expense, and mentioned the certification work that would be filed as an administrative cost when provided by staff.

Mr FARKAS, Director at EBA (European Banking Authority), recalled that the Agency was in a transitional period, as it was still taking over activities from its predecessor. He also considered that the general rules of the Financial Regulation were not suited to the specific way of financing the Agency (60% of the budget from MS and 40% from the EU budget), adding that they had not experienced problems with financing from MS.

Mr MAES, Director at ECHA (European Chemicals Agency), said that a number of measures had been adopted to address conflicts of interest, such as guidance, the establishment of an advisory Committee, and the update of templates. A database with declarations of interest had been set up. Disciplinary and breach of trust procedures had also been adapted.

Ms MCLADE, Director at EEA (European Environment Agency), recalled that the Agency was only funded by the EU budget. Concerning conflicts of interest, she stated that the applicable provisions were those of the Financial Regulation, even if extra checks were carried out. In particular, she mentioned a regular review of external advisers. She gave further details on past procurement procedures to Ms MACOVEI, but recalled that these were mainly covered by past discharges. She assured Ms ANDREASEN that training costs were scrutinised annually by the board.

Ms GESLAIN LANEELLE, Director at EFSA (European Food Safety Authority), recalled that a risk analysis of conflicts of interest had already been carried out back in 2007 by the Agency, and sampling had addressed both experts and staff. Declarations of interests had been required from 2007. The Recommendation from the CoA had been taken on board, and implementing rules on

conflicts of interest had been adopted in March 2012: enforcing them was the main focus of the current effort. A review of the Rules was scheduled to take place end 2013. She also announced further ongoing work with the Commission to reduce dependence on outsourcing, since external experts were nowadays working with both universities and industry. Responding to Mr FJELLNER, she gave a concrete example of assessing a conflict of interests. She told Ms MACOVEI that the election of the Chair of the management board took place at an open meeting, by secret ballot, to ensure a free vote. She added that all new panel appointments in 2012 complied with the new rules on conflicts of interest. She also stated that the same rules applied to conflicts of interest involving family members. She told Ms AYALA SENDER that EFSA was reviewing the safety of aspartame at the request of the Commission.

Mr POTT, Director at EMA (European Medicines Agency), agreed with the rapporteur that Agencies were squeezed between an increasing number of administrative rules and the request to reduce administrative costs. Taking the example of EMA, he concluded that the larger the staff of an Agency, the lower the impact of administrative costs in percentage terms. Concerning carryovers, he highlighted the difficulties encountered by Agencies earning their own money and those that received a budget at the beginning of the year. He told Ms AYALA SENDER that the Financial Regulation was intended for the organisation of expenditure and suggested that a hierarchy of principles be applied, so that the principle of an annual budget would be subordinated to the principle of sound financial management. He also provided explanations concerning the evaluation of the cost of medicines from MS. He agreed with the rapporteur that a body should assist the coordinator of the Agencies' network. Concerning conflicts of interest, he expressed the concern that competence may be lost if the right balance was not struck and considered that a risk-based approach such as the one adopted by the EMA was appropriate. EFSA was also working with DG SANCO to review the conflict of interest provisions by the end of 2013.

Mr VERSLYPE, Director at ERA (European Railway Agency), highlighted the transitional system that was being applied by the Agency, which was awaiting the adoption of a new Regulation. He supported the rapporteur and considered that the budgetary and administrative provisions for Agencies should be in line with their size and resources.

Mr KJAERUM, Director at FRA (European Union Agency for Fundamental Rights), told Ms MACOVEI that a well-being survey of staff was conducted regularly and recalled that all the proceedings for harassment had been closed with no further action. As for whistleblowers, he stated

that a consultation had been launched, following a discussion within the board to step up the system. In the meantime, the Commission guidelines of 9 December 2012 would continue to apply.

The Commission representative told Ms AYALA SENDER that action 86 of the Road Map provided for a more rigorous differentiation between the responsibilities of the Commission and those of the agencies in discharge decisions and resolutions.

He also referred to an alert and monitoring system that the Commission could trigger. Concerning the alert mechanism, he assured CONT that it would be used carefully by the Commission. He also mentioned discussions within the Commission to propose an economy of scale approach for Agencies. As for the seat of CEPOL, he stated that the Commissioner in charge was aware of the problem. Finally, he recalled that rule 110 of the Staff Regulations allows for exceptions.

In his concluding remarks, Mr SPRENGER stressed the role of the network of EU Agencies, while his assistant described the way in which the network was organised and mentioned six sub-networks. A seventh network for scientific advice would be soon established. The Head of Agencies had already mandated several of the sub-nets to implement the Road Map.

Item 4 on the agenda

Special Report No 15/2012 (2011 discharge) - Management of conflict of interest in selected EU Agencies

CONT/7/11193

Rapporteur: Ms AYALA SENDER (S&D, ES)

- Presentation of the Special Report

Mr LUDBORZS, Member of the European Court of Auditors, delivered only part of the speech in Annex II because of time constraints. The complete speech was distributed to CONT Members.

The rapporteur considered that a suitable set of rules had been prepared for the Agencies which would enhance their independence and their mission.

Ms MACOVEI underlined the importance of addressing conflicts of interest, given the blurred borders between public and private interests. She considered that the issue should be extended to all the EU institutions and bodies. She looked forward to a follow-up report from the CoA and asked the Director of the EASA about the implementation of the Agency's Code of conduct. Ms HERCZOG (S&D, HU) inquired about the scope of application of a future set of common rules

concerning conflicts of interest. Mr GOUDOU, Director at EASA, recalled that the Code of conduct adopted by the Agency reflected all the requirements set out by the CoA. He assured CONT that new declarations of interest were collected pursuant to the Code and that all the declarations had been scrutinised. He added that the decision-making procedure of the Agency required a collegial approach, so that no individual was in a position to take a decision on behalf of the Agency, which in his view represented a guarantee against any conflicts of interest. The Director of EFSA gave further detailed figures on the implementation of the Agency's Code of conduct. Mr POTT, Director at EMA, recalled that no EU framework provisions existed on conflicts of interest and that a new policy and procedures in this field had been drawn up since the October 2011 hearing.

The Commission representative pointed out that the Commission Road Map of December 2012, following the Common Approach endorsed by the European Parliament, the Council and the Commission in July 2012, identified conflicts of interest as one of the five priority actions. The action should include the following steps: screen the existing rules on conflict of interest, draft guidelines, discuss them with the Agencies by the end of 2013, give CONT feedback on the discussions. He considered the option of full transparency to be the best way forward and proposed the publication of the declarations of interest.

Mr LUDBORZS told Ms MACOVEI that due consideration would be given to the guidelines to be developed, given their importance within the Road Map. Answering Ms HERCZOG, he gave his personal view that any regulatory framework dedicated to management of conflict of interest situations should apply to all agencies, although specific issues could be addressed by individual Agencies in the light of the specific nature of the relevant situations.

Ms AYALA SENDER noted that a workshop was scheduled at CONT on 21 February 2013.

Item 5 on the agenda

Any other business

No other business was discussed.

Item 6 on the agenda

Next meeting(s)

- 18 February 2013, 15.00 – 18.30 (Brussels)
- 19 February 2013, 9.00 – 12.30 and 15.00 – 18.30 (Brussels)

speaking notes for the COCOBU hearing as of 24 January 2013

Discharge of agencies 2011

DRAFT

Dear Chairman, Honourable members, ladies and gentlemen,

I'm very grateful for this opportunity to be present at the Budgetary Control Committee to discuss the 2011 discharge of the European agencies with you and your colleagues. As you know very well, there is an important gap between the financial risk related EU agencies and decentralised bodies that all together count for around 1.5% of EU budget, and the risks that those bodies bear given their sometimes sensitive missions, and high public exposure.

Let me start with a short reminder of the ECA mandate. I will then present the 2011 audit results, the tweaks brought to the audit approach for 2012 and the way we intend to answer to the Parliament concerns with regard to the audit of agencies.

1. ECA and the Audit of EU agencies

What is our mandate. According to article 287 TFUE the Court's audit is a combination of financial audit for the financial and budgetary accounts, compliance audit for the legality and regularity of transactions.

Within this framework, the Court provides for each agency one Specific Annual Report including two different opinions, one for the accounts and one for the legality and regularity of underlying transactions. The audit work and notably the analysis of the budget execution may also give rise to observations on the quality of financial management.

2 Results 2011 and audit 2012

2011 results

What are the main results from the 2011 audits?

In 2011 39 agencies (actually 38 + 1 pension fund of Europol) have been audited compared to 32 entities in 2010. The Court concluded that all 39 accounts were reliable in all material respects and thus presented a true and faire view. With regard to the underlying transactions 38 out of 39 opinions were unqualified (clear) and one qualified opinion was issued on the legality and regularity of the transactions underlying of the European Centre for Disease prevention and Control in Stockholm for not complying with ceilings set in a framework contract. Those satisfactory results in terms of audit opinion do not mean that no error or weaknesses were identified but that those errors and weaknesses were below the level of materiality defined as 2% of the budget.

The Court has noted the request of the Parliament for more information after the 2010 discharge and has taken steps to satisfy this request within its mandate and its constrained resources. In 2011 more information has been provided on financial management and weaknesses in key controls. The main observations that did not call into question the opinion of the Court in 2011 related to:

- Weaknesses in budget management (high levels of transfers and carryovers and low levels of implementation) (in 28 agencies)
- Weaknesses in recruitment procedures (in 24 agencies),
- Weaknesses in some key controls systems notably in the management of fixed assets and inventory (in 10 agencies) and in procurement procedures (lack of documentation of estimated contract value or unclear selection and award criteria

2012 audit

The Court kept on improving its audits in 2012. The audit approach has been upgraded to enhance the audit assurance and the information provided to the Parliament. Notably, through its audit on budgetary accounts the Court strives to assess the quality of the budget planning and execution. The number of agencies to be audited is constantly increasing. In 2012 the audit work will require 70 missions with as many Statements of Preliminary Findings. The Court will deliver 40 Specific Annual Reports that will present 80 opinions (accounts + legality/regularity) on the 40 decentralised bodies audited.

The audit approach for 2012 has been renewed both for planning and for reporting.

- **Methodology:**

Statistical techniques have been introduced to determine the sample of transactions to be tested. It provides higher objectivity and, in fine, stronger audit assurance. This statistical approach is combined with an analysis of risk to obtain a representative sample that includes identified risk areas,

- **reporting**

For 2012 the reporting format has been tweaked to enable a better monitoring of comments that do not call the Court's opinion into question. Those comments will be reported under three specific headings (budgetary and financial management, key controls of the supervisory and control systems, and other comments). In addition a Follow-up table of the Court's previous year comments will be systematically reported.

1. Perspectives and future challenges

The Court will continue to offer inputs to the European Parliament discharge process with a view to enhance the information provided, notably on budgetary management. The follow up table that will be inserted in the Specific Annual Reports for 2012 should offer valuable historical horizon and should make it easier for the European Parliament to put its discharges in perspective over the years.

The Court welcome the roadmap on the follow up to the common Approach on EU decentralised agencies, issued by the Commission in December 2012. Many elements of this document, notably the actions planned to reinforce the annual and multi annual work programmes and to better link between budget requests, budget resources and actions carried out, are fully in line with the Court's current approach to connect as much as possible the audit of the budget to the quality of management.

The Court also welcomes actions planned in the Activity Based Budgeting, as well as new developments such as the alert/warning systems or the anti fraud activities. The Court will consider carefully those elements that should further reinforce the assurance it provides.

Another challenge facing us ahead is the implementation of the new Financial Regulation that directly impacts the audit of agencies. Indeed, Article 208 of the new Financial Regulations provides for independent external auditors to audit the reliability of the agencies' accounts. It also requires the Court to consider the work of these auditors to fulfil its mandate. Detailed implementation arrangements should be determined in the framework financial Regulation referred to in Article 208 (1), which is delegated to the Commission. Within its remits, the Court is currently reflecting on how the implementation of Article 208 can at best add value to the agencies' audit process, enhancing the Court's contribution to EU public accountability and avoiding duplication of work

M. Chairman, ladies and gentlemen, thank you for your attention.

EUROPEAN COURT OF AUDITORS

D^r Igors Ludboržs

Member of the European Court of Auditors

**Management of Conflict of Interest in
selected EU Agencies**

Special Report N° 15/2012

THE COMMITTEE ON BUDGETARY CONTROL OF
THE EUROPEAN PARLIAMENT

*Check Against Delivery
Seul le texte prononcé fait foi
Es gilt das gesprochene Wort*

Brussels, 24 January 2013, (a.m.)

Mr Chairman,

Honourable members,

I thank you for the opportunity to be here today and for your interest in the European Court of Auditor's Special report on the Management of Conflict of Interest in selected EU Agencies published already in October last year.

The topic of conflict of interest is one which in recent times seems to be scarcely out of the media. Conflict of interest situations can occur almost in any workplace at any time. The organisations concerned must either eliminate the risks or ensure that procedures are in place to manage the risks effectively. If these situations are not handled correctly they can negatively affect the decision-making process, give rise to scandals and rapidly cause reputational damage. This is most apparent when public bodies are concerned since it can lead to a loss of trust in their ability to operate impartially and in the best interests of society.

1) I would start by explaining why the European Court of Auditors chose this topic and the objectives of the Court's audit

In 2011 the European Parliament requested the Court to “undertake a comprehensive analysis of the agencies’ approach to the management of situations where there are potential conflicts of interest”. This followed a number of alleged cases in recent years pertaining to conflict of interest involving certain EU Agencies which had been widely reported in the press.

The European Union has at its disposal a wide range of agencies which treat a wide range of topics. Moreover, many of these Agencies take vital decisions affecting the safety and health of consumers in the areas of transport, food safety or medicines.

Taken altogether, the risks and consequences of poor management of conflict of interest situations are significant especially in such highly specialised organisations where expertise is frequently in limited supply and evolves between public and private bodies.

The Court's audit evaluated policies and procedures for the management of conflict of interest situations for four selected Agencies: namely the European Aviation Safety Agency (**EASA**), European Chemicals Agency (**ECHA**), European Food Safety Authority (**EFSA**) and the European Medicines Agency (**EMA**).

The audit aimed to answer the following main audit question:

- Do the selected Agencies adequately manage conflict of interest situations?

and two specific questions:

- Are there adequate policies and procedures in place to manage conflict of interest situations?
- Have selected Agencies adequately implemented their policies and procedures on management of conflict of interest situations?

and to provide conclusions and recommendations on the same points.

At the outset of the audit it was necessary to establish two parameters:

First, a definition of a *conflict of interest situation*: In this respect we found helpful the definition provided in the OECD Guidelines. There it was stated "*...there are situations in which the private interests and affiliations of a public official create, or have the potential to create, conflict with the proper performance of his/her official duties*".

Second, there was a need to establish a reference framework for minimum requirements on, for example, independence and transparency for key players. It was necessary once again to resort to the OECD Guidelines, which offer an international benchmark for designing a comprehensive conflict of interest policy.

2) I would now like to turn to what the auditors actually found in the audit and the Court's recommendations.

Our audit focussed on the policies and procedures for the management of conflict of interest situations in four European Union Agencies.

The Court's first finding was that there is no comprehensive EU regulatory framework dedicated to conflict of interest which would ensure comparable minimum requirements on independence and transparency applicable to all EU Agencies and to all key players that influence strategy, operations and decision-making.

As concerns the detailed findings, the Court found rather a mixed picture.

The Court established that **none of the selected Agencies** adequately managed conflict of interest situations. The level and type of deficiency varied from Agency to Agency. If you have access to a copy of the report you can see this clearly in the table following paragraph 89 as well as in the tables in annexes III and IV.

Concretely the Court found the following:

Out of the selected Agencies, **EMA** and **EFSA** had developed the most advanced policies and procedures for managing conflict of interest. **ECHA's** policies and procedures were found to be incomplete and less precise while **EASA** did not have any at all.

Generally speaking, the selected Agencies lacked adequate policies and procedures to identify a conflict of interest before a candidate (for example, an expert, a member of the Management Board or a member of the Board of Appeal) was appointed. This was widespread over **all the agencies examined**.

Furthermore, the Court found deficiencies in agencies' assessment of declarations of interest. In particular, agencies lacked clear assessment criteria, or where there were such criteria, agencies did not always apply them consistently. Of particular note was the implementation of **ECHA's** policies and procedures for staff and the Board of Appeal which were found to have significant shortcomings.

As concerns the issue of transparency with respect to the publication of annual declarations of interests, the Court found that this was properly dealt with by **all selected Agencies**, except **EASA**. However, the Court also noted that the selected Agencies are less transparent in terms of the publication of interests declared during the meetings of the Management Board and scientific bodies, where applicable, and in the context of the scientific decision-making process.

Training on conflict of interest was also examined by the Court and it was found to be provided by all selected Agencies, but in **ECHA** and **EASA** shortcomings of varying importance were found. In **EASA** they related to the type of training provided whilst in **ECHA** to the obligation to attend these training sessions.

The Court's audit also looked at the selected Agencies' policies and procedures in place when officials or experts leave the selected agencies to work in the private sector. The Court identified a number of shortcomings in this respect, notably:

(a) Lack of provisions that address risks associated with post-employment activities of experts and Members of the Management Board and the Board of Appeal;

(b) Absence of objective criteria as to what situations constitute conflict of interest;

(c) Negotiations for future employment are not covered by current policies and procedures of selected Agencies.

And finally, the Court found that only **EMA** had a policy on gifts and invitations which applied to the whole agency.

To address these weaknesses the Court made several recommendations which are also detailed in the report and flow logically from our conclusions.

The Court recommends, for example, that **all selected Agencies** should establish or continue to develop conflict of interest policies and procedures that effectively address their specific risks.

Candidates in the selected Agencies should be screened for conflict of interest before their appointment. This applied to **all agencies examined**.

The **selected** Agencies should establish clear and objective criteria for the assessment of declarations of interest and apply them consistently; the same applies for clear, transparent and consistent breach of trust policies and procedures that cover the entire Agency. For **ECHA** in particular, it should improve the implementation of conflict of interest policies and procedures for staff and the Board of Appeal Members.

The **selected** Agencies should fully disclose interests declared during meetings and in the context of scientific decision-making process and should, in coordination with all the appointing bodies involved, address any post-employment issues. In particular **EASA** should put in place a system of declarations of interest and ensure transparency by publishing them on its website.

EASA, ECHA and **EFSA** should have gifts and invitations policies and procedures that cover the entire agency.

Although the report concludes on four selected Agencies, the Court invites all EU Institutions and decentralised bodies to examine whether its recommendations may also be relevant and applicable to them.

The Court also recommends that the EU legislator, perhaps in consultation with other EU Institutions, consider further developing the EU regulatory framework dedicated to management of conflict of interest situations, using the OECD Guidelines and existing best practices as a reference.

One additional point is important to clarify at this stage. The Court completed its audit field work in October 2011 and thus it is important to note that any developments made by Agencies subsequent to this date have not been evaluated by the Court and are not reflected in the current report.

3) A final and brief word now on how the Court carried out its work

The Court carried out an analysis of the selected Agencies' regulatory framework. It held meetings with the selected Agencies' management, Agencies' staff and various boards (for example, Management Board, Advisory Board, Board of Appeal).

It carried out a desk review of selected Agencies' policies, procedures, internal guidelines, declarations of interests, minutes of the Scientific Panels/Committees' meetings, staff's personal files, and it examined how selected Agencies applied their policies and procedures to the specific cases.

The Court presents its observations on a chronological basis. In other words, the policies and procedures were analysed for key players at the time of their appointment, while they were at the Agency, and then when they leave.

Thank you for your attention.
