

Annex 1

GENERAL GUIDELINES FOR 'STAFF AS AMBASSADORS'

In view of the priority given to communication by the Commission, these guidelines are intended to provide you with guidance on speaking to the public or the media as part of your work as a member of staff or interacting with members of the public and/or stakeholders in the course of your duties.

A NEW COMMUNICATION ENVIRONMENT

The new Staff Regulations represent a clear recognition of a changed communication environment, to which a public administration must adapt. A more open, transparent, communicative Commission capable of responding to citizens' needs and questions requires more communicative staff.

The new Staff Regulations are based on the idea that staff are an important communication resource for the Commission and should be trusted and encouraged to speak about their work, while taking due account of the need for loyalty and impartiality. Of course, many staff already do this successfully on a regular basis, with very few problems. There is, however, the potential for more staff to participate more often in contacts with stakeholders and the public and for a wider sharing of responsibility for contacts with the media. This can both benefit the Commission and be very rewarding for the staff involved, as the perspectives gained from such experiences are likely to impact positively on their work and thereby on the Institution's. In this context, there is a need both for clarity on how the Staff Regulations apply to outside contacts undertaken as part of staff duties and for more help and support for staff, so that they can be even more effective 'ambassadors' for the Commission.

This new approach to communication was reinforced by the Commission in its Action Plan to improve communicating Europe (SEC(2005)985), adopted in July 2005; Action 11 of that Plan makes clear provision for staff to "actively speak to the public and, when necessary, to the media in close collaboration with the Spokespersons' Service."

Training to develop relevant communication skills, such as speaking in public, media skills, etc. is available. See 'communication' training in the Syslog catalogue: http://www.cc.cec/di/syslog_formation/catalogue/catalogue.cfm.

TYPES OF 'AMBASSADOR'

In this context, two types of 'ambassador' can be distinguished:

- **staff in general.** This comprises all staff because our interactions with the public and stakeholders inevitably have an impact on how the Commission and, by extension, the EU is seen. Furthermore, all of us will - in our life outside work - communicate an image of the Commission, regardless of our function or grade.
- **staff as representatives of the Commission.** This covers staff who are called upon to take on a representative role because of the nature of their job, or who are selected or volunteer to do so in the framework of a particular initiative or activity. This includes in particular:
 - Commission Spokespersons
 - Management
 - Specialist speakers
 - Generalist speakers
 - Staff in Representations (including DGT field offices)/Delegations
 - Staff speaking at seminars, conferences or other events/initiatives, or negotiating on behalf of the Commission.

STATUTORY FRAMEWORK

Under the Staff Regulations, the relevant obligations in this context are:

Execution of duties and conduct - Article 11

The general principles governing how staff should carry out their duties and conduct themselves are laid out in Article 11 of the Staff Regulations:

"An official shall carry out his duties and conduct himself solely with the interests of the Communities in mind; he shall neither seek nor take instructions from any government, authority, organisation or person outside his institution. He shall carry out the duties assigned to him objectively, impartially and in keeping with his duty of loyalty to the Communities."

Actions that might reflect on your position – Article 12

Staff should refrain from any action or behaviour which might reflect adversely on their position or could bring the European civil service into disrepute. In this context, this is relevant, notably with regard to

- publications and speeches (on professional matters)(Article 17a(2)), and
- disclosure of information (Article 17).

Freedom of Expression – Article 17a(1)

The new Staff Regulations now make clear reference to the staff member's right to freedom of expression (Article 17a(1)), with the necessary provisos:

"An official has the right to freedom of expression, with due respect to the principles of loyalty and impartiality."

CORE PRINCIPLES OF CONDUCT

In combination with the Code of Good Administrative Behaviour, it is therefore possible to distil a set of core principles that should guide staff in how they carry out their tasks and behave. These are:

- **Objectivity**, which means presenting any situation in a reasoned and unprejudiced manner.
- **Impartiality**, which involves weighing opinions in a balanced manner and without taking a position – for example, explaining the reasons behind a Commission position, while acknowledging differing views.
- **Loyalty** to the Institution, which means presenting the Commission's views within your field of competence to the best of your ability, and by clearly respecting the views expressed so far by the Commission and the Commissioner responsible.
- **Discretion**, which essentially refers to the non-divulgence of any information that has not yet been made public (Staff Regulations, Article 17).
- **Circumspection**, which calls for a degree of caution, carefulness and moderation and a due sense of proportion and propriety.

Above all, this is a matter of common sense. As a rule, officials should be prudent in their behaviour. It is also important to be clear about the difference between, on the one hand, circumspection and, on the other, discretion with regard to facts and information to which staff are privy while performing their duties (professional secrecy), which is also an obligation.

'STAFF IN GENERAL'

All of us have the potential to have a positive impact on the external image and reputation of the Commission through our daily work in how we interact with members of the public and stakeholders, external visitors, Member State representatives, representatives of interest groups or associations, opinion-makers, journalists, etc.

In terms of what can be expected of you as a member of staff, a clear distinction has to be drawn between:

- the **image you project of the Commission in the course of your duties** as a member of staff, and
- your **private persona**.

Interactions with members of the public and stakeholders in the course of your duties

Most of us will, from time to time, have contacts with members of the public and stakeholders, and perhaps even opinion-makers and multipliers, during the course of our work – when answering a phone call, when attending a meeting with stakeholders, when replying to a letter or an e-mail, etc.

In these instances, the way we behave may have a lasting impact. The impressions we give to people interacting with us will be taken home and passed on to others. Such experiences then form the basis of our reputation.

We need to keep this in mind in the course of our duties. In addition to the general obligations of **objectivity, loyalty and impartiality**, as well as **discretion**, in particular when handling certain types of information, it is worth recalling two other important qualities called for in the Code of Good Administrative Behaviour: **courteousness** and **efficiency**.

Speaking as a private individual to people outside the Commission

The right of freedom of expression is explicitly recognised in the new Staff Regulations, subject to certain limits as described above.

Of course, there will also be occasions when you are simply expressing opinions as a private individual. It is worth considering that, on such occasions, those views can carry a certain weight with those hearing them, who will probably see you as a Commission official as well as a private individual.

'STAFF AS REPRESENTATIVES OF THE COMMISSION'

Some of us may be called on as part of our duties, or may volunteer, to take on a specific representative role for the Commission as an 'ambassador' or 'speaker'. This may involve speaking to the public and/or having contacts with the media, as part of our work.

Speaking to the public as part of your work

You may be called on, or volunteer, to talk to groups of visitors, to make a speech or presentation at a conference or speak at another type of event. This could involve speaking to stakeholders, specialists or members of the public, either in the framework of your own DG's activities or in the context of the Commission's Visits Service or a Commission initiative.

If you are assigned a role as 'ambassador' or 'speaker' within your DG or are participating, as part of your duties, even on a voluntary basis, in a Commission public outreach initiative, the mission order

itself should be treated as an authorisation to speak to the public or address a conference or similar type of event. For high-profile engagements likely to be reported in the media (national, regional or local), your DG's information and communication unit or media/public relations officer should be informed, so as to be able to notify the relevant Spokesperson(s) prior to the activity, where necessary. As an 'ambassador' or 'speaker', you should also follow relevant "Lines To Take" developed by the Spokespersons Service, to ensure that the Commission speaks with one voice on the same subject. Immediately after the activity, your DG's information and communication unit or media/public relations officer should be informed about any reactions or developments in the context of your activity that could trigger media attention. If necessary, they will bring it to the attention of the Spokesperson concerned. Commission staff in Representations or Delegations should refer themselves to the local press/media officer or Head of Representation/Delegation.

When speaking to external audiences as part of your duties as a member of staff, you need to keep in mind the following:

- The Commission's position will form the point of departure of a presentation or speech. Based on good practice within the Commission, your task as 'ambassadors' and 'speakers' should be facilitated, as far as possible, by providing you with:
 - A mandate and guidelines from your DG (information and communication unit) or DG COMM, for Commission-wide initiatives (e.g. 50th anniversary of the Treaty of Rome);
 - A clear frame of reference in terms of subject matter (policy, issues), including the 'Lines to Take' developed by the Spokesperson's Service;
 - An agreed set of key messages and narratives (including, where appropriate, for potential 'hot topics' outside the particular target policy area(s));
 - Ad hoc guidance from management and the DG's information and communication units, upon request.
- In presenting material or answering questions, you should be guided by the following key obligations as a member of staff: **objectivity, impartiality, loyalty** to the Institution, and **non-divulgence** of information not yet made public. In the interests of balance, you should acknowledge, where appropriate, the existence of differing viewpoints on a topic. Nonetheless, where the Commission position needs to be explained and defended, you should do so robustly.

Clearly, how you speak, how much you go into depth or detail, and what you say will be fundamentally determined by the framework in which you are to communicate. However, in order to communicate well with your audience, you will need to adapt the presentation of material to your audience's needs, interests and degree of knowledge and, wherever possible, relate it to their daily lives or experiences. This may involve translating complex, technical or bureaucratic language into terms that are easily understandable to your audience. This relies on your good judgement, analytical skills and common sense.

In making an engaging presentation, you are strongly encouraged to introduce certain personal elements and structure, as well as to arrange and focus your material in a way that corresponds to the audience's interests and expectations. Before giving a speech in public, as a DG expert, you should clarify whether media representatives will be or are in the audience and whether the so-called "Chatham House Rules" apply. A meeting, or part of a meeting, held under such rules means that participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed. Where media representatives are likely

to be in the audience, the advice of your DG's information and communication unit or media/public relations officer should be sought; they, if necessary, can also refer you to the Spokesperson.

While you enjoy freedom of expression with regard to views you express as a private individual, it is worth noting that when you speak in a private capacity as part of an official event or mission, your interlocutors may not easily be able to make the same distinction between your 'public' and 'private' persona.

'Speaking' on the Internet

The same considerations apply when staff 'speak' on the Internet. Participation in discussion forums, blogs or Internet chats may play an increasingly important role as the Commission engages in dialogue with citizens. There is essentially no difference between a Commission member of staff attending an event, visiting a school or delivering a speech and the same person taking part in a discussion forum or contributing to a blog. When 'speaking' to external audiences via the Internet, the same guidelines apply as mentioned above (remit, clear frame of reference, key staff obligations). Likewise, you are strongly encouraged to introduce certain personal elements and structure, relying on your good judgement and common sense.

Recording or publication of presentations

Particular care should be taken if your presentation is going to be recorded (TV, radio, tape) or reproduced (publication). If it is likely to be recorded, before proceeding, you should contact your DG's information and communication unit or media/public relations officer, who can, if necessary, refer you to the Spokesperson responsible. Likewise, if your speech might be published, under Article 17a(2) of the Staff Regulations, the Appointing Authority should be informed in advance (in principle 30 working days), just as would be the case for any other article or publication on an EU matter. In practical terms, however, this means that your speech or its essential content should, where possible, have prior clearance from your DG's hierarchy. Make sure this is covered by your mission order. Do not forget that it is often the case that speeches delivered during conferences, congresses and symposia are subsequently published.

Contacts with the media as part of your work

What should you do if you are contacted by a journalist? As a general rule, DG Communication (including the Representations in the 27 Member States) and the Spokespersons Service are responsible for contacts with the media. In view of their public profile, Directors-General and Heads of Delegation in third countries also have specific responsibilities in the field of communication and information. Especially where a request is of a political nature, you should refer the journalist directly to the appropriate Spokesperson for that portfolio, giving the journalist, if necessary, the Spokesperson's contact details.

However, when requests for information concern technical subjects falling within your specific areas of responsibility, you may answer them, informing your DG's information and communication unit or media/public relations officer; this may refer to a specific enquiry or to all technical questions on a given topic. Offer to call back, if necessary, but take responsibility for the question and ensure that an answer is sent promptly to the journalist. Do not simply refer the question to the Spokesperson. There is no justification for not giving a journalist an item of factual, technical information that would be given to any member of the public. You should notify your DG's information and communication unit or media/public relations officer, who will, if necessary, inform the Spokesperson responsible, so that he or she can supplement the information given to the journalist, where necessary, or put it in the relevant political context. If in doubt, you should first contact the Spokesperson.

All staff have a role to play in giving thought to the issue of communicating with the press. You can give the Spokesperson for your portfolio an early warning on issues that might spark media interest

and you should respond promptly to requests for information from the Spokesperson's Service so that extremely tight deadlines can be met.

Be aware that you should avoid discussing any matter which is still at the preparation or discussion stage and on which the Commission has not adopted an official position. Information on questions of this kind is specifically a matter for the Spokespersons, in consultation with the *Cabinets* concerned, unless they have given specific authorisation to the contrary.

As a DG expert, you may be asked by the Spokesperson to provide expert information to the media. As a rule, this should always be done on a "background" basis without your name being cited (i.e. "off the record"), and you should make this absolutely clear before speaking to a journalist.

When attending conferences or other external events as part of your duties, you should anticipate the possibility of spontaneous requests from the media, by coordinating with your DG's information and communication unit or media/public relations officer. In politically sensitive cases or when in doubt, you should inform the Spokesperson responsible.

Some practical guidelines when talking to the media

Where possible, ask for the questions in writing ahead of a planned interview, as this makes it easier to give answers that have been agreed and approved by your hierarchy.

For all such interviews, and when participating in or attending events where spontaneous requests for an interview or comment could occur, make sure you have a few prepared short key messages and/or narratives that can be delivered.

For print media, as a rule, you should not agree to be quoted when providing information in your field of technical expertise. However, this obviously does not apply if the article or interview has a human-interest or personal-profile focus.