



Council of the European Union
General Secretariat

Directorate-General Communication and Information - COMM
Directorate Information and Outreach
Information Services Unit / Transparency
Head of Unit

Brussels, 16 December 2022

Ms Svenja Scholz
Email: ask+request-12229-084c87fb@asktheeu.org

Ref. 22/2622-ws/nb

Request made on: 25.11.2022

Dear Ms Scholz,

Thank you for your request for access to documents of the Council of the European Union.¹

You are requesting "documents which contain information regarding the Council's current public communication strategy" and more specifically "documents, which specify who the Council's Directorate-General Communication and Information and other (for example, personal) communication staff or advisers are talking to, why they are talking to them, how and when they will talk to them, what form of communication the content takes and what channels they use to share it".

The main basis for interaction of staff of the General Secretariat of the Council (thus including staff of its Directorate General for Communication and Information) is the Code of Good Administrative Behaviour, which you will find published at the following address:

<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2001:189:0001:0004:EN:PDF>

Pursuant to Article 10 of this Code, the Press Office is responsible for contacts with the media, but when requests for information from media concern technical subjects falling within their specific areas of responsibility, other members of staff may answer them.

¹ The General Secretariat of the Council has examined your request on the basis of the applicable rules: Regulation (EC) No 1049/2001 of the European Parliament and of the Council regarding public access to European Parliament, Council and Commission documents (OJ L 145, 31.5.2001, p. 43) and the specific provisions concerning public access to Council documents set out in Annex II to the Council's Rules of Procedure (Council Decision No 2009/937/EU, OJ L 325, 11.12.2009, p. 35).

The principles of this Code have been translated into internal guidelines, and you will find the ones currently applied enclosed (file name: Press and audiovisual.pdf), as taken from the intranet site of the General Secretariat.

Please refer to Articles 4 to 9 of the Code for general interaction with the public at large and specifically when providing information, replying to letters and telephone calls.

We have also identified the following further documents as relevant to your request:

- the GSC External Communication Strategy (of February 2022)
download link: <https://www.consilium.europa.eu/media/58412/gsc-external-communication-strategy-en.pdf>
- the "DG COMM 1 Style guide"
enclosed as "COMM1C_press_and_web_style_guide.pdf"
- the guide on "Inclusive Communication in the GSC"
download link: <https://data.europa.eu/doi/10.2860/09975>
- the "GSC Social Media Code of Conduct" (Please note that this staff note is outdated and currently being reviewed.)
enclosed as "cp00035.en15.pdf"
- staff notes 83/11 and 4/19 on the "Back to School/University" initiative
enclosed in partially accessible versions (see below) as "cp00083.en11.PA.pdf" and "cp00004.en19.PA.pdf"

In terms of reporting on communication activities, you may want to refer to the annual activity reports of the Directorate General for Communication and Information (until 2015 "Directorate General for Communication and Document Management"), which you can find at the following address:

<https://www.consilium.europa.eu/en/general-secretariat/staff-budget/annual-reports/>

You may also be interested in a study of the Brussels press corps:

download link: https://www.consilium.europa.eu/media/54576/eu-press-corps-report_final_web_010322.pdf

Finally, the enclosed documents "Outreach and Engagement (COMM 2 A).pdf", "Visits and events.pdf" and "Become a speaker!.pdf", as taken from the intranet site of the General Secretariat, will provide you some information on further activities, such as the visits organised by the General Secretariat.

Concerning staff notes 83/11 and 4/19, please note that access to some parts has to be withheld for the following reasons:

Staff note 83/11 contains personal data about identified persons. The personal data contained in this document is necessary for the organisation of the work of the Council.

EU data protection rules² provide that when the personal data collected is to be used for a different purpose, including disclosure to the public, a balance needs to be established between the public interest in having access to such data and the legitimate right of individuals to protect their personal data..³

After carefully considering all the principles related to this request, on balance the General Secretariat has concluded that disclosure of the personal data contained in the document would undermine the protection of privacy and the integrity of the identified individuals. Therefore, the General Secretariat has to refuse access to this data..⁴

Staff note 4/19 contains functional email addresses and hyperlinks for internal purposes. Release of these addresses and links would affect the security of IT systems.

Full disclosure of the document would therefore undermine the protection of the public interest as regards public security. As a consequence, the General Secretariat has to refuse access to these addresses and links..⁵

Pursuant to Article 7(2) of Regulation (EC) No 1049/2001, you may ask the Council to review this decision within 15 working days of receiving this reply. Should you see the need for such a review, you are invited to indicate the reasons thereof.

Yours sincerely,

Fernando FLORINDO

Enclosures

² Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (OJ L 295 21.11.2018, p. 39).

³ Article 9 of Regulation (EU) No 2018/1725.

⁴ Article 4(1)(b) of Regulation (EC) No 1049/2001.

⁵ Article 4(1)(a), first indent, of Regulation (EC) No 1049/2001.