



**SG.2**  
**Head of Division**

Brussels, 15 March 2023  
eeas.sg.2 (2023) 2809596

To  
Mr Arun Dohle  
by electronic mail

*Subject: Your request for access to documents of 18 February 2023*  
*EEAS ref: 2023/029*

Dear Mr Dohle,

I would like to thank you for your request for access to documents, which the EEAS has examined in the framework of Regulation (EC) No 1049/2001.

Following your application, we have searched for “*all data relating to the Hope and Homes for Children and Lumos joint training of EEAS staff that took place on 31 January 2023. Including, but not limited to, training materials, audiovisual material*”, in the EEAS filing systems and document management databases.

After this search, the EEAS has identified the following seven documents matching your application, as referenced hereafter:

1. Agenda HHC Lumos Training Supporting child care and protection systems reform in EU external action, dated 31 January 2023.
2. Invitation Training, Training Supporting child care and protection systems reform in EU external action, dated 31 January 2023.
3. Presentation, Training Supporting child care and protection systems reform in EU external action, dated 31 January 2023.
4. Guiding questions, Training Supporting child care and protection systems reform in EU external action.
5. Report, Training Supporting child care and protection systems reform in EU external action.
6. Background survey, Training Supporting child care and protection systems reform in EU external action
7. Draft exit survey.

I am pleased to fully forward to you the documents 1, 3, 4, 6 and 7, and partially forward to you the documents 2 and 5 in attachment to this letter

EEAS has asked for the consent of the individuals mentioned in the above document for the disclosure of their personal data, in line with the legal provisions on the protection of personal data. Following the replies received, please find attached the partially released personal data of the EU officials who have provided consent.

A complete disclosure is prevented by the exception concerning the protection of privacy and the integrity of the individual outlined in Article 4(1)(b) of Regulation 1049/2001 because they contain the following personal data:

- email addresses;

Article 9(1)(b) of Regulation (EU) 2018/1725 does not allow the transmission of these personal data, except if you establish that it is necessary to have the data transmitted to you for a specific purpose in the public interest and where there is no reason to assume that the legitimate interests of the data subject might be prejudiced. Given the sensitive nature of the topic, disclosure of the names of participants can represent a danger to their security and thus disclosure without demonstrating the overriding public interest of publishing these names, their disclosure cannot take place.

In your request, you do not indicate the task in the public interest for which you want to have access to these personal data, nor do you put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

Consequently, we conclude that, pursuant to Article 4(1)(b) of Regulation 1049/2001, further access cannot be granted to the personal data contained in the requested documents, as the need to obtain access thereto for a task or a specific purpose in the public interest has not been substantiated weighing the specific purpose in the public interest you established, and the legitimate interests of the individuals concerned resulted in the assessment that the prejudice to the legitimate interest of the individuals by the disclosure of the personal data concerned is not overridden by the public interest you established.

Please note that documents originating from third parties are disclosed to you based on Regulation (EC) No 1049/2001. However, this disclosure is without prejudice to the rules on intellectual property, which may limit your right to reproduce or exploit the released documents without the agreement of the originator, who may hold an intellectual property right on them. The EEAS does not assume any responsibility from their reuse.

Should you wish this position to be reviewed, you may make a confirmatory application within 15 working days in accordance with Article 7(2) of the Regulation.

Yours sincerely,

*[e-signed]*

Nereo Penalver Garcia

