

EUROPEAN EXTERNAL ACTION SERVICE



DG Resource Management
The Director-General

Brussels, 31 March 2023
eeas.sg.2 (2023) 2889240

Mr Arun Dohle
by electronic mail

Subject: Your confirmatory application for access to documents
EEAS ref: 2023/029

Dear Mr Dohle,

I would like to thank you for your e-mail of 15 March 2023, in which you make a confirmatory application, in accordance with Article 7(2) of Regulation (EC) No 1049/2001 regarding public access to documents.¹

I have re-examined your initial request from 18 February 2023, where you requested access to documents which contain *"the following information: 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 its reply of 15 March 2023 with the reference 2023/029, the relevant service of the EEAS in charge of handling requests for access to documents (SG.2 "Parliamentary Affairs") informed you that on the basis of the information you provided, a search for documents had been conducted in the EEAS filing systems and document management databases.

Following this search, the EEAS has identified the following documents matching the request:

1. Agenda HHC Lumos Training Supporting child care and protection systems reform in EU external action, dated 31 January 2023 (document 1)
2. Invitation Training, Training Supporting child care and protection systems reform in EU external action, dated 31 January 2023 (document 2)
3. Presentation, Training Supporting child care and protection systems reform in EU external action, dated 31 January 2023 (document 3)
4. Guiding questions, Training Supporting child care and protection systems reform in EU external action 9 (document 4)
5. Report, Training Supporting child care and protection systems reform in EU external action (document 5)
6. Background survey, Training Supporting child care and protection systems reform in EU external action (document 6)

¹ 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, of 31.5.2001, p. 43, hereafter the "Regulation").

7. Draft exit survey (document 7)

The documents 1, 3, 4, 6 and 7 were released fully while documents 2 and 5 were partially released with redactions made to the personal data of the mentioned individuals.

In your confirmatory application which we have received on 15 March 2023, you requested that a new search shall be undertaken as you were especially interested in the correspondence before and after the training.

Following your confirmatory request, the relevant EEAS Division has been contacted and asked to reassess if additional documents may be identified as falling within the scope of your request.

After a new search in the EEAS filing systems and document management databases, the below email communications by and with HHC Lumos concerning proposal to organise training session for EU staff on child care reform and child protection systems were found:

1. Email with the title “Children’s Rights advocates welcome the NDICI as a crucial step to advance children’s rights globally”, December 2021, (document 1)
 - 1.1. Annex to the email: 1.1Joint Statement Child Rights Advocates on NDICI, December 2021, (document 2)
2. Email with the title “Proposal for a training on the use of EU external funds for Care reform and deinstitutionalisation, June 2022, (document 3)
 - 2.1. Annex to the email: HHC_Lumos Joint Capacity Building Sessions Training Outline, (document 4)
3. Email with the title “RE_ Hope and Homes for Children and Lumos training for EU external action”, December 2022, (document 5)
4. Email with the title “RE_ Hope and Homes for Children and Lumos training for EU external action”, January 2023, (document 6)
5. Email with the title “5. Re Lumos and Hope and Homes for Children Proposal Joint trainings”, February 2022, (document 7)
 - 5.1. Annex to the email: Draft Concept Note Capacity Building Webinars on NDICI and DI_Lumos and HHC, (document 8)
 - 5.2. Annex to the email: Joint Statement on NDICI_final, December 2021, (document 9)
 - 5.3. Annex to the email: Joint Recommendations_NDICI_Kenya, February 2022, (document 10)
6. Email with the title: “NDICI Training Webinars_ Hope and Homes for Children”, August 2022, (document 11)
7. Email with the title: “RE The road to global child protection and care systems reform Request for a meeting with the CEO of Hope and Homes for Children”, June 2022, (document 12)
8. Email with the title “RE The road to global child protection and care systems reform Request for a meeting with the CEO of Hope and Homes for Children”, November 2022, (document 13)
 - 8.1. Annex to the email: “HHC_Lumos Joint Capacity Building Sessions_Training Outline”, (document 14)
9. Email with the title “Update_ Joint Hope and Homes for Children and Lumos Training”, November 2022, (document 15)

I am pleased to forward you fully the documents 2, 4, 8, 9, 10, 14 in attachment to this letter. The documents 1, 3, 5, 6, 7, 11, 12, 13 and 15 are partially released with redactions made to the personal data of the mentioned individuals. The 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 individuals 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 the Regulation because they contain the following personal data:

- email addresses, addresses and phone numbers;

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.

In your request, you do not express any particular interest 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, I conclude that, pursuant to Article 4(1)(b) of the Regulation, access cannot be granted to the personal data contained in the requested documents, as the need to obtain access thereto for a purpose in the public interest has not been substantiated and there is no reason to think that the legitimate interests of the individuals concerned would not be prejudiced by disclosure of the personal data concerned.

Please note that documents originating from third parties are disclosed to you based on the Regulation. 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.

You have a right, in accordance with Article 8 of the Regulation, to institute court proceedings against the European External Action Service and/or make a complaint to the Ombudsman, under the conditions laid down in Articles 263 and 228 of the Treaty on the Functioning of the EU respectively.

Yours sincerely,



Gianmarco Di Vita