



**Monitoring compliance of EU institutions and bodies with
Article 24 of Regulation (EC) 45/2001**

Report on the Status of Data Protection Officers

Brussels, 17 December 2012

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Executive Summary

As public administrations, EU institutions and bodies process personal data and must comply with the principles and obligations set out in the relevant data protection rules, namely Regulation (EC) 45/2001¹. The European Data Protection Supervisor (EDPS) monitors and ensures compliance with the Regulation².

Article 24 of the Regulation provides that each institution/body has to appoint at least one Data Protection Officer (DPO) to ensure in an independent manner its internal application. Article 24 sets out in particular the conditions of appointment of the DPO, their status and the general conditions governing the performance of their duties.

The DPO plays a key role in ensuring effective compliance with data protection principles within European institutions and bodies. The importance of the function has been recognised in the package for reforming the EU rules on data protection which is currently under discussion by the EU legislator. The EDPS has provided support to the DPOs from the very beginning.

In this context, the EDPS has decided to monitor compliance of European institutions and bodies with Article 24 of Regulation (EC) 45/2001 through a questionnaire sent to all EU institutions and bodies.

The responses have been displayed by groups³ of comparable institutions and bodies in tables related respectively to the mandate of the DPO, their position and their resources. A distinction has been made between DPOs in office and former DPOs to show the trends since 2001.

This report confirms that the DPO function is now well established within EU institutions and bodies, and that they generally comply with Article 24 of the Regulation. It also underlines some areas of concern which will be the subject of further monitoring by the EDPS.

The results of this survey will be taken into account by the EDPS in planning further supervision and enforcement activities.

The report is also intended to support the DPOs by providing them with greater insights in some key aspects of their network.

¹ Regulation (EC) 45/2001 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data

² In accordance with Article 41 (2) of the Regulation.

³ See annex 1 of the report.

1. Introduction

The European Data Protection Supervisor (EDPS) is responsible for monitoring and ensuring the application of the provisions of the Regulation (EC) 45/2001 (the "Regulation") on the protection of individuals with regard to the processing of personal data by the EU institutions and bodies and on the free movement of such data, as provided in its Article 46 (c).

The Regulation also provides that each institution/body has to appoint at least one Data Protection Officer (DPO) to ensure in an independent manner the internal application of the Regulation.

A full section of the Regulation ("Section 8") is dedicated to the DPO function. This clearly shows that this function is intended to play a key role in ensuring effective compliance with data protection principles within European institutions and bodies. Therefore the EDPS has provided support to DPOs since the very beginning, in particular by issuing a position paper on the role of Data Protection Officers in ensuring effective compliance with Regulation (EC) 45/2001 (henceforth the "DPO Role Paper")⁴. The standards contained in this document were later reinforced by the Professional standards for Data Protection Officers of the EU institutions and bodies working under Regulation (EC) 45/2001 (henceforth the "DPO Professional Standards Paper")⁵ drawn up by the DPO network. These two documents highlight the necessity for the institutions/bodies to provide DPOs with the necessary safeguards listed in Article 24 of the Regulation on the appointment and tasks of the DPO, allowing them to properly carry out their duties.

More recently the importance of the function has been confirmed in the legislative package for reforming the EU rules on data protection adopted by the Commission on 25 January 2012 (proposed Regulation and proposed Directive) and which is currently under discussion by the European Parliament and the Council. In his opinion on this package, the EDPS has welcomed that, building on the positive experience gained by several Member States and by the EU institutions and bodies, the legislative package makes the mandatory designation of a DPO of more general application⁶. The EDPS has also stated that *"the DPO, performing his duties and tasks independently, is a key element of the proposed new legal framework since he would not only have to inform and advise the controller or the processor of their obligations but also to monitor internally the application of [the Regulation] and finally to act as a contact point of the supervisory authority."*⁷

In this context, the EDPS has decided to monitor the compliance of EU institutions and bodies with Article 24 of Regulation (EC) 45/2001. In addition,

⁴ *Role of Data Protection Officers (DPO) in ensuring effective compliance with Regulation (EC) No 45/2001*, 28 November 2005, available on EDPS website

⁵ *Professional Standards for Data Protection Officers of the EU Institutions and bodies working under Regulation (EC) No 45/2001*, available on EDPS website

⁶ §209 of the Opinion of the EDPS on the data protection reform package, 7 March 2012, available on EDPS website

⁷ *id.*

this exercise may also provide DPOs with comparative information on their network.

2. Methodology

a) Questionnaire

In accordance with Article 24 (5) of the Regulation, the European institutions and bodies have to register with the EDPS the DPO that they have appointed. On this occasion, information on the status of the DPO is sometimes given, but the extent of this information varies. The EDPS has decided therefore to launch a questionnaire on the "Data Protection Officer's Status" in order to be provided with consistent information about the state and evolution of the DPO function within the different European institutions/bodies.

On 16 May 2012, the EDPS wrote to all EU institutions and bodies to invite them to provide the following information related to every DPO whose mandate is ongoing or has expired during the last ten years by completing an attached table:

- Name
- Duration of the mandate (as foreseen in the Appointment Decision and Implementing rules)
- Cumulative years of appointment (total number of years of appointment of the DPO)
- Real term of office (from appointment date to end of the last mandate)
- Status
- Position (function and administrative attachment)
- Resources (time , support, training)

This information should be updated on the occasion of any further registration of a DPO with the EDPS by providing, in addition to the appointment decision, the same information concerning the newly appointed or reappointed DPO.

b) Responses of the Institutions and bodies

Most responses were received by the EDPS before 18 June 2012. At the time of writing all EU institutions and bodies save two (BEREC and EASA) have replied to the questionnaire. It is to be noted however that the information provided is not always complete, in particular concerning the position and resources of the DPO.

c) Comparative tables

The responses have been assessed and assembled in three comparative tables on, respectively, the mandate, the position and the resources of the DPO. Where necessary the information sent by institutions and bodies has been adapted to ensure a consistent presentation and/or completed with information already provided to the EDPS at the time of the registration of the DPO.

To maintain a consistent methodology with that used for the general "Survey 2011" and to allow a valid comparison, institutions and bodies have been divided into four groups according to the year of establishment of the bodies and the period of appointment of a DPO (see annex 1). In addition given that the DPOs of Eurojust and Europol have always been active and well involved in all DPO initiatives and meetings, the EDPS has invited these bodies to take part in this exercise to the appropriate extent.

d) Limitations of the methodology

Since almost all EU institutions/bodies have replied to the questionnaire, the results may be considered generally meaningful. It appears however that they have not always understood the questions in the same way and that several of them have not replied to all questions. Thus, notwithstanding the above mentioned adaptations introduced by the EDPS to ensure consistency, these caveats should be kept in mind when assessing the accuracy of the figures and the relevance of the analysis that follow.

e) Processing of personal data

Since this initiative implies a processing of personal data, the EDPS has notified his own DPO of the processing. The notification and the relevant Privacy Statement are available in the DPO section of the EDPS website.

3. General considerations concerning the appointment of a DPO

<p>The Regulation provides that each European institution and body has to appoint at least one person as Data Protection Officer (Article 24.1) and to register him with the EDPS (Article 24.5).</p>

At present all institutions and bodies save one (ESMA) comply with these provisions. The EDPS is satisfied with the significant progress achieved on this matter since the general "Survey 2011". Indeed two bodies (ECDC, ENIAC JU) which had no DPO and two bodies which were in the process of appointing a DPO (ACER, EEAS) have in the meantime confirmed their decision. Furthermore two newly established bodies (BEREC, EASO) have rapidly appointed a DPO.

Article 24.1 of the Regulation allows institutions some flexibility by providing that at least one person has to be appointed as DPO. However, up to now only two institutions/bodies (Commission, CEDEFOP) have nominated more than a single person for this task. The Commission has appointed two DPOs, designating a second, specific one for OLAF⁸, and CEDEFOP has recently appointed a second DPO. To take into account the size of the institution and to have contact points in its different Directorates General (DGs), the Commission has also appointed a "Data Protection Coordinator" (DPC) in each DG. This new function which has been taken up by other institutions will be further addressed below under paragraph 5 b) on DPO resources.

It should also be noted that four bodies have appointed respectively a "DPO ad interim" (EEAS), a "back up DPO" (EIT and EFCA) and an "acting DPO" (EASA) to replace the DPO in case of absence. To the EDPS' knowledge there is a growing tendency for European bodies to appoint a DPO ad interim in particular in case of maternity leave or sick leave. The EDPS would encourage this practice which allows for continuity of the function particularly when the DPO has no support staff.

4. Comparative results of the questionnaire as regards the DPO mandate

Article 24.4 of the Regulation stipulates in particular that the DPO shall be appointed for a term between two and five years and shall be eligible for reappointment up to a maximum of ten years.

The EDPS pointed out in the DPO Role Paper that the appointment of the DPO for a fixed term contributes to ensuring the independence of the DPO. Indeed the longer the mandate, the more this contributes to providing the guarantee that DPOs can carry out their function in an independent manner. Therefore the EDPS supports appointment for a term of five years. The DPO Professional Standards Paper also considers that *"a five year appointment should be the norm, unless it is not possible under the circumstances"*.

In this context, the EDPS considers it essential that the term of office is specified both in the implementing rules of the EU institution/body and in the appointment decision of the DPO.

The comparative table of information provided on the DPO mandate is set out in annex (3). It displays the duration of the mandate (*as included in the relevant implementing rules and/or the appointment decision*), the total number of years of appointment and the real term of office (*from appointment date to the end of the last mandate*) concerning every DPO presently in office or whose mandate has expired during the last ten years.

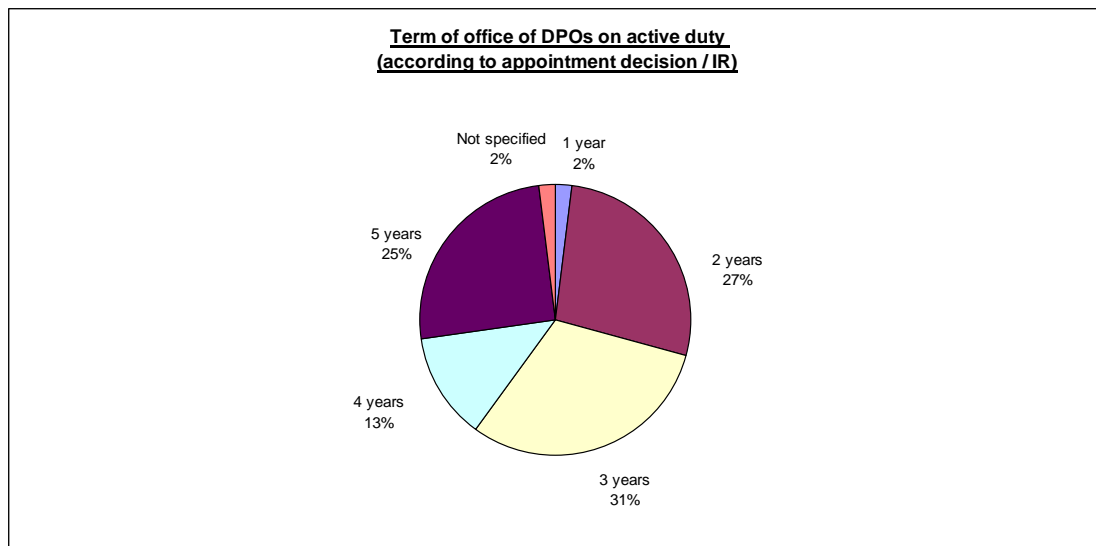
a) Mandate

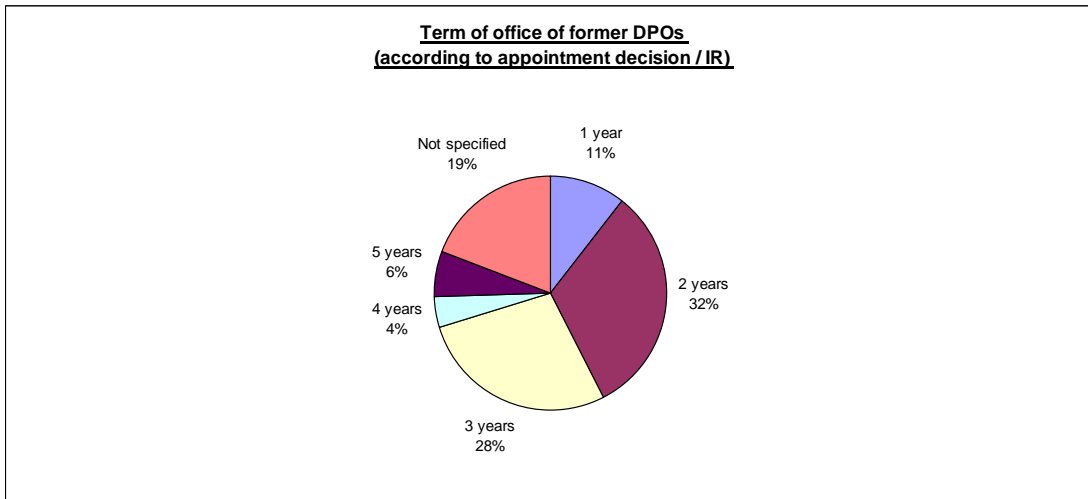
⁸ This was done so as to address the specificities of OLAF activities and to preserve the independence of OLAF in the performance of these activities.

The following two charts summarise the situation regarding the length of the mandate as included in the relevant implementing rules and appointment decision. They show respectively the present situation (DPOs in office) and the past situation (former DPOs) as a percentage of the DPO population.

According to these figures 96% of DPOs in office (70% of former DPOs) have (have had) a mandate between 2 and 5 years which complies with Article 24.4 of the Regulation. Furthermore a quarter of DPOs in office (6 % of former DPOs) have (have had) a mandate of 5 years thus following the recommendation of the EDPS. This is confirmed by the evaluation of the average term which is more than 3 years for DPOs in office and around 2 years for former DPOs. Provided that the figure given relates in practice the term set forth in the relevant legal acts, the EDPS considers that both the present situation and the underlying trend are very positive. The EDPS also notes with satisfaction that in contrast with the situation of the former DPOs, there are now very few cases where the mandate of the DPO is either unspecified or less than 2 years.

However, the situation of contract staff should be closely followed. Whilst there are constraints related to the duration of the contract for a DPO who is a member of the contract staff, the EDPS considers that it is incumbent on the relevant body to ask for resources allowing it to comply with the Regulation. The EDPS has already made this clear to certain Directors of agencies and reserves the right in the future to draw the attention of the responsible directorate general of the Commission on such a failure to respect Article 24.4.

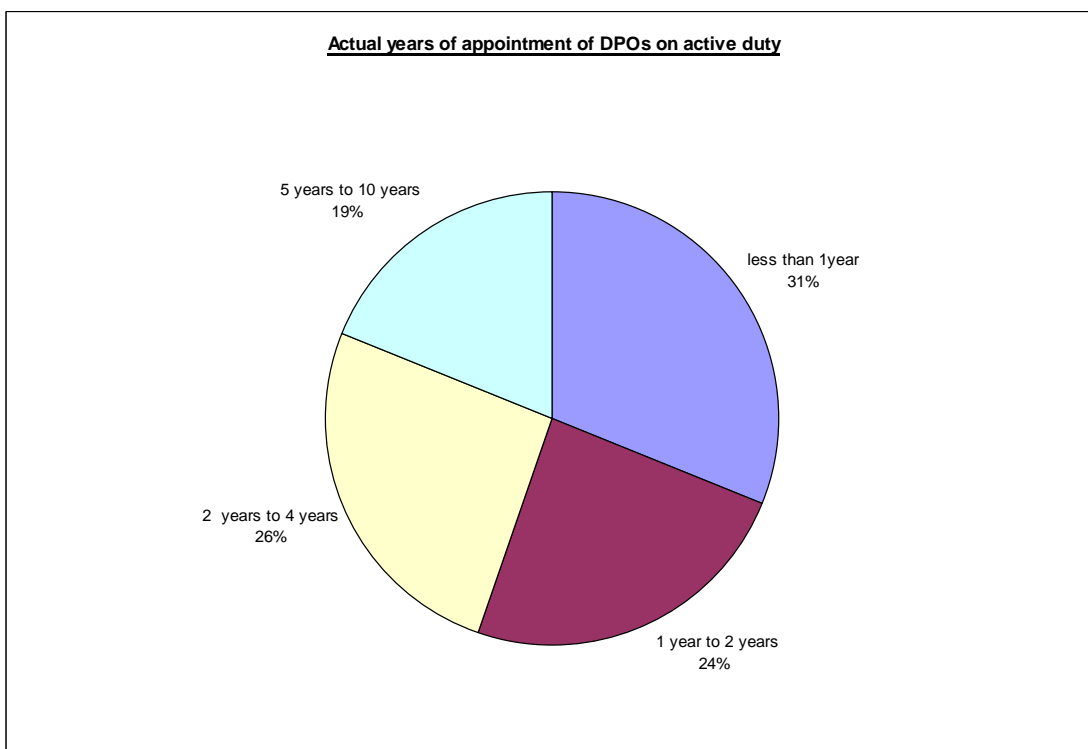




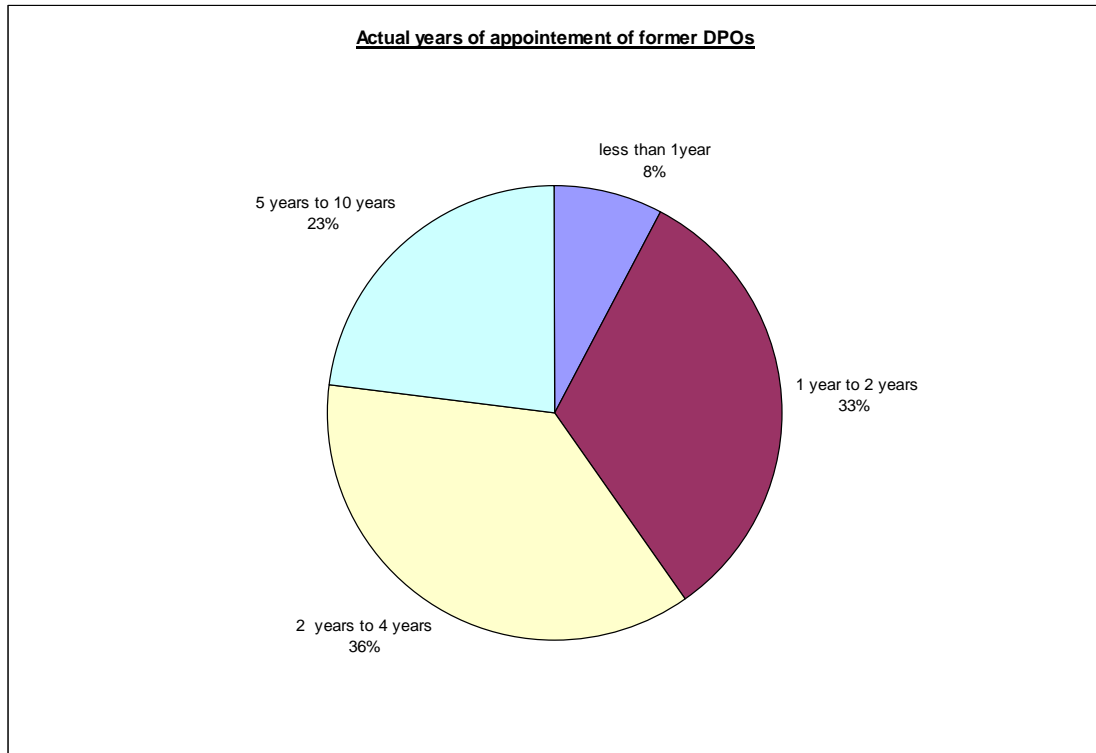
b) Actual years of appointment

The two charts below display the actual number of years of appointment for DPOs in office and for former DPOs. This information is especially relevant to estimate the expertise of DPOs and may also give some indication about the DPO turnover (see point c) below).

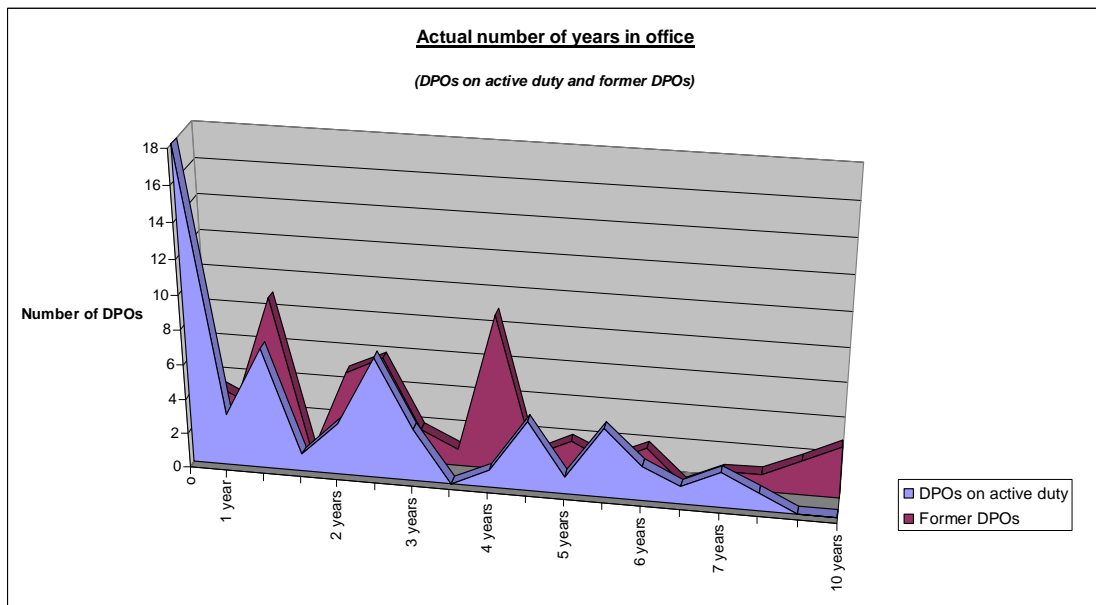
The first chart shows that more than 45% of DPOs in office have already gained a significant experience (19% have been in office between 5 and 10 years, 26 % between 2 and 4 years). Taking into account in particular that a number of DPOs have been recently appointed by newly established EU bodies and that the first appointed DPOs have now left their functions, the EDPS considers that this situation is satisfactory and will continue to improve in the coming years.



The following chart demonstrates that almost a quarter of the former DPOs have attained by the end of their mandate(s) a period in office of more than 5 years. According to the table in annex (3) this period in office has even been up to 10 years for five of them (Parliament, Council, ECJ, EIB, CDT). In addition it is to be noted that in around 60% of cases the actual number of years was more than 2 years. These findings demonstrate that the maximum total term of 10 years for a DPO set out in Article 24.4 has been respected and that the minimal term of 2 years has been met in practice in a majority of cases.



The last chart gives a different and more detailed view of the actual seniority of the DPOs in office and of the former DPOs.



c) DPO turnover

In about 30% of cases the DPO has been in office for one year or less. Furthermore, more than half of the present DPOs have been in office for less than two years. Different reasons can explain a high DPO turnover in a given institution/body, in particular a change in the structure of the organisation, the choice of a short term, the age of the DPO, the absence of definition of a term of office, a poor understanding of the skills required for the function or a failure to comply with conditional dismissal as set out in Article 24.4. While it is not always easy to assess the actual reasons for an observed high turnover, the EDPS intends to closely follow the situation since it may affect both the expertise and the independence of the DPO.

The table given in annex 3 allows a comparison between institutions/bodies of the same group with regard to the number of years of application of the Regulation.

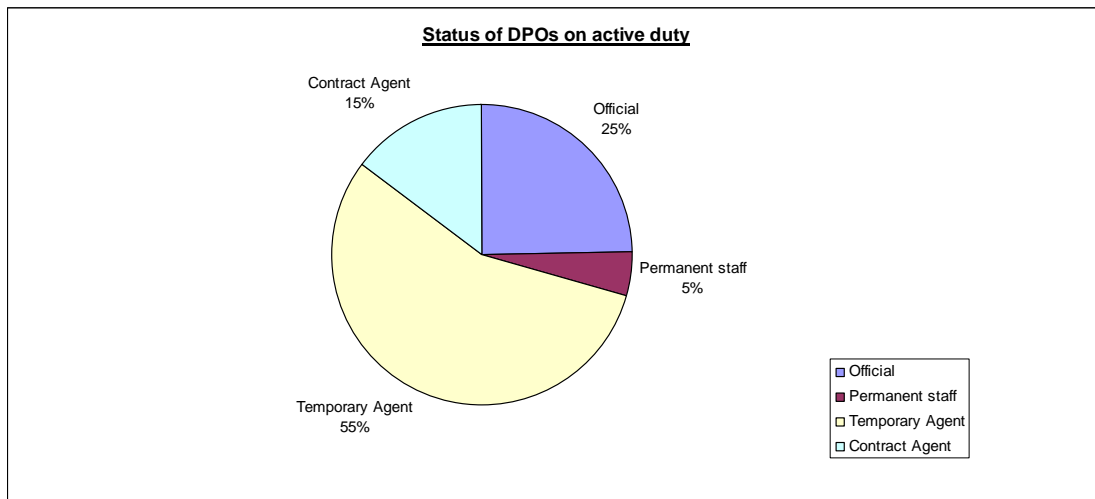
4. Comparative results of the questionnaire as regards the DPO position

The comparative table of the information provided on the DPO position is given in annex (4). It displays the function and the administrative attachment of the DPO.

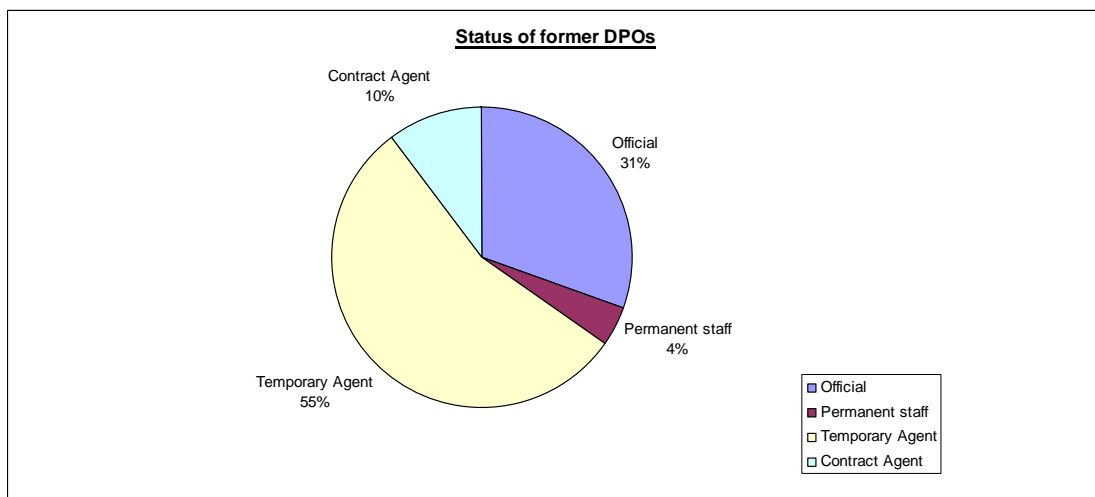
a) Status of the DPO

As shown below, at present most DPOs (55%) are temporary agents while 25% are officials and 15 % contractual agents. The EDPS acknowledges the different situations of EU institutions and bodies with respect to the recruitment of their staff⁹. None the less, when the DPO is recruited as temporary or contract staff, the institution or body should ensure that the period of recruitment allows for compliance with Article 24.4 (i.e. a term between two and five years). Any compelling reasons not to do so should be justified to the EDPS and appropriate solutions should be found as soon as possible. Furthermore, as mentioned above, the contractual relation should not hinder independence of the DPO in the performance of his/her duties.

⁹ Most agencies resort to temporary or contract staff.



It should be noted that the situation is not very different for former DPOs except a slightly higher number of officials (31%) and a slightly reduced number of contractual agents (10%). This reflects the growing number of agencies and other bodies among the organisations subject to the Regulation.



b) DPO position

Under "position of the DPO" the questionnaire was looking for additional information on the DPO function(s) and their administrative attachment.

i) Background and other functions

According to Article 24.3, the selection of the DPO shall not be liable to result in a conflict of interests between his/her duty as DPO and any other official duties, in particular in relation the the application of the Regulation.

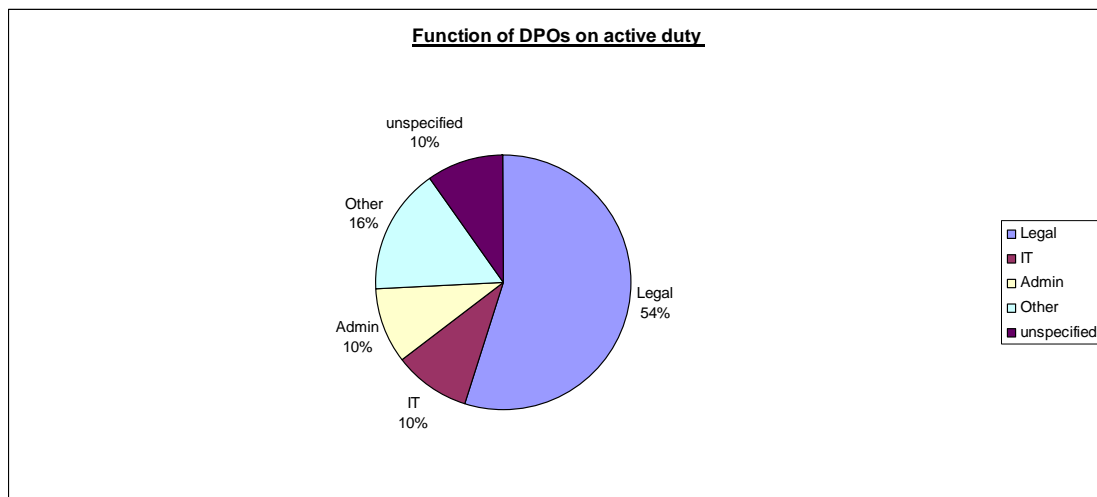
As it will be shown below (paragraph 5 a) the DPO function is in most cases a part time position. For this reason the answers provided in response to the EDPS questionnaire do not always have the same meaning. While for part

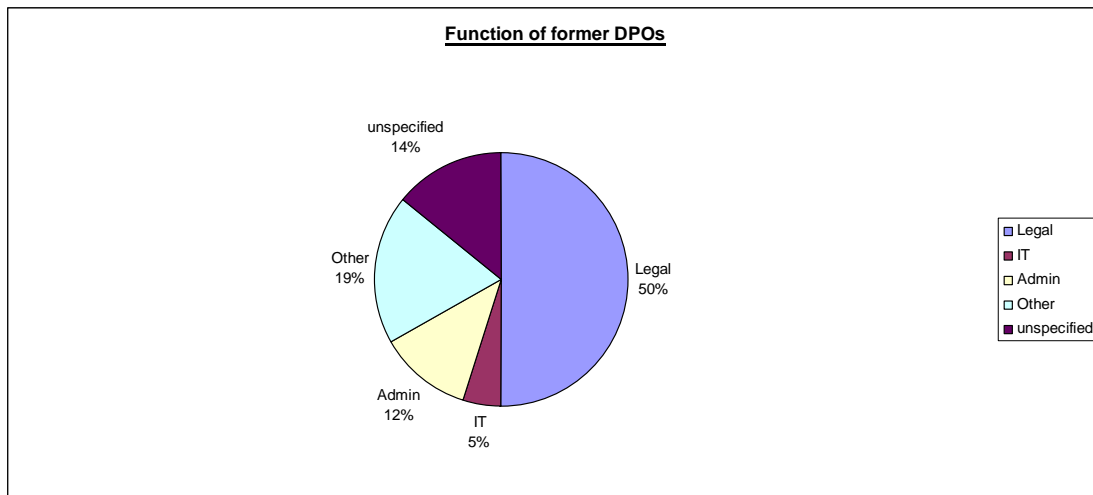
time DPOs the answers consisted in naming their other function, for full time DPOs the answers provided either refer to the DPO function, the previous position (e.g. legal adviser), the function group (e.g. Administrator) and even the managerial position (e.g. Head of Unit...).

Moreover, since the functions mentioned are varied, it has been necessary to regroup them into large categories. The following categories have been established:

- Legal (Legal Adviser, Head of legal service, Head of DP Unit);
- IT (Head of IT, IT Officer, information security);
- Admin (Head of Admin/Finance, Head of HR, HR Officer, Financial Verifying Agent, Procurement Officer);
- Other (Information Management, Internal Auditor, Organisation expert....);
- Unspecified (Deputy Head of Division, Adviser....)

The following two charts concern respectively the DPOs in office and the former DPOs. They reveal that the majority of them (around 50%) have a legal background or a second occupation in the legal sector. As regards, the administrative/financial function, it concerns around 10% of DPOs with a slight decreasing trend (12% for former DPOs). IT position is now at the same level of 10% with a clear rising trend (5% for previous DPOs).





These findings give rise to the following comments.

With respect to the occupation of an administrative function, the EDPS acknowledges that it is important for a DPO to have a good understanding of the way the institution operates and of its personal data processing operations which are mainly carried out by the Administration. However EU institutions and bodies should be careful to avoid any conflict of interests between DPO duties and any other official duties. In particular, part time DPOs should not act as data controller in their primary activity. This would be notably the case for a Head of Administration/HR or a Head of IT Unit since they are likely to be responsible for many processing operations.

The EDPS also notes that the majority of DPOs have a legal background. As rightly noted in the DPO Professional Standards Paper, the DPO should ideally have an expertise in the area of EU data protection law and an expertise in IT, including IT security. Against this background, the EDPS welcomes the progress of IT expertise within the DPO network and would encourage further improvement either at selection or through appropriate training.

ii) Administrative attachment

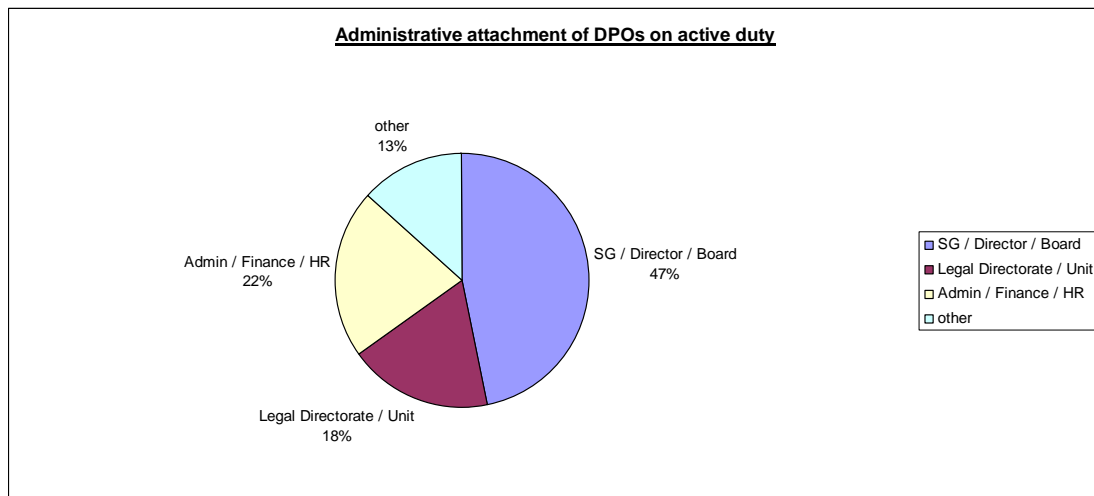
Two provisions of the Regulation are particularly relevant on this regard:

- the DPO has the task of ensuring in an independent manner the internal application of the regulation (Article 24.1 (c));
- with respect to the performance of his/her duties, the DPO may not receive any instructions (Article 24.7).

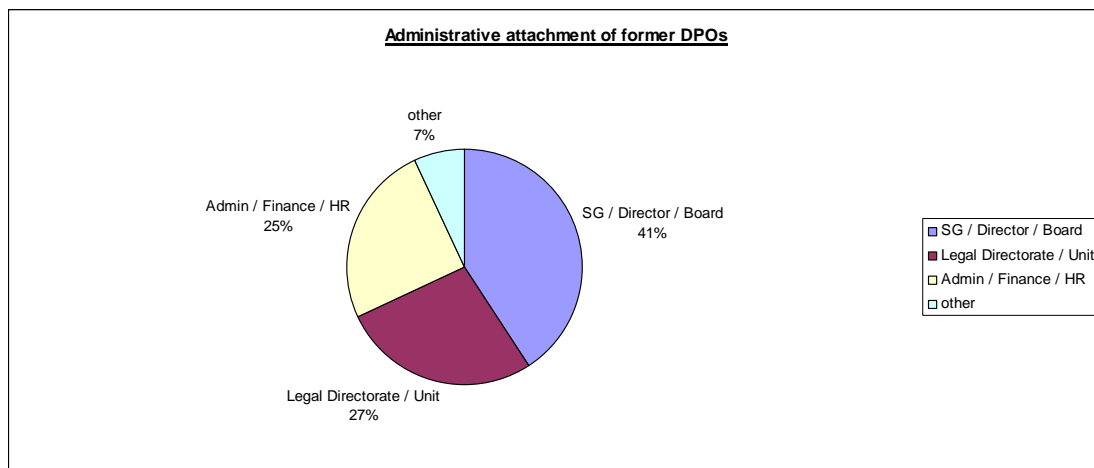
As pointed out by the EDPS in the DPO Role Paper *"Independence is also an issue related to the hierarchical position of the DPO and the person he/she should report to."*

This is also acknowledged in the document on Professional Standards for DPOs of the EU institutions/bodies which underlines in particular that the DPO should report to, and be reviewed by, the administrative Head of the institution or body.

The following chart seems to confirm that such an adequate situation is met in the near majority of cases. Indeed almost half (47%) of the DPOs in office are attached to the Secretary-General, the Board or the Director of the body. Other DPOs are attached to the Administration/HR/Finance Department (22%) or to the Legal Department (18%). A few others have various administrative attachments (operations, quality, governance...)



The second chart below shows a slight change with respect to the situation of former DPOs. It appears first that there is an increasing trend to administratively attach the DPO to the Head of the institution/body (47% as opposed to 41%). Also fewer DPOs are now administratively attached to the Administration or the Legal Service (18% Legal and 22% Administration/Finance as opposed to 27% Legal and 25% Administration/Finance).



Among these two scenarios, reporting to the Administration is the most problematic. On the one hand, the Legal service has the duty to assess the legal risks for the institution/body and to defend it, which has some relation with the DPO duties and is in principle not problematic except where the file handled by the legal service is data protection related. On the other hand, the Administration is generally the main service responsible for the processing operations carried out by the institution/body. For reasons already mentioned, the EDPS considers that the DPO should preferably be attached to the Head of the institution or body.

5. Comparative results of the questionnaire as regards DPO resources

The comparative table of information provided on DPO resources is provided in annex (5). It displays the time allocated to the DPO function, the support and the training granted to the DPO.

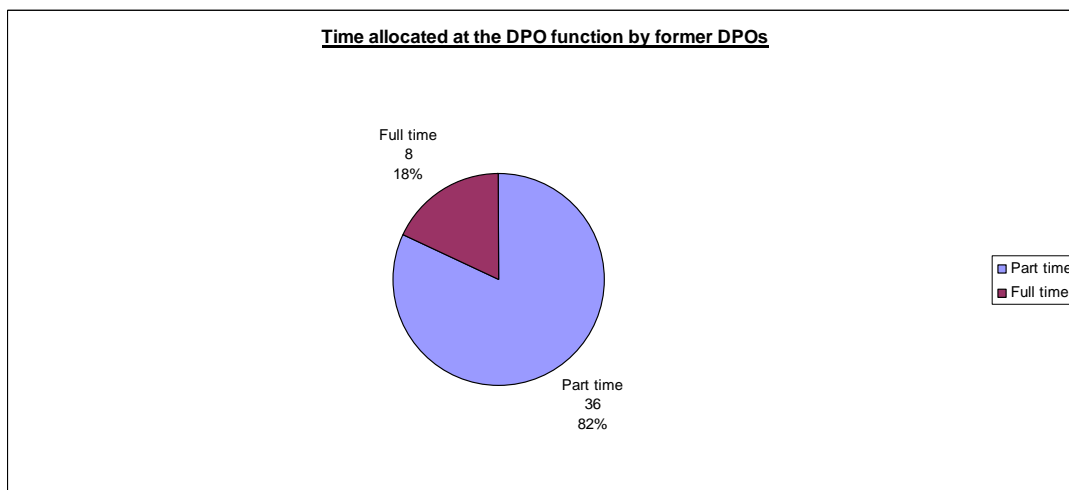
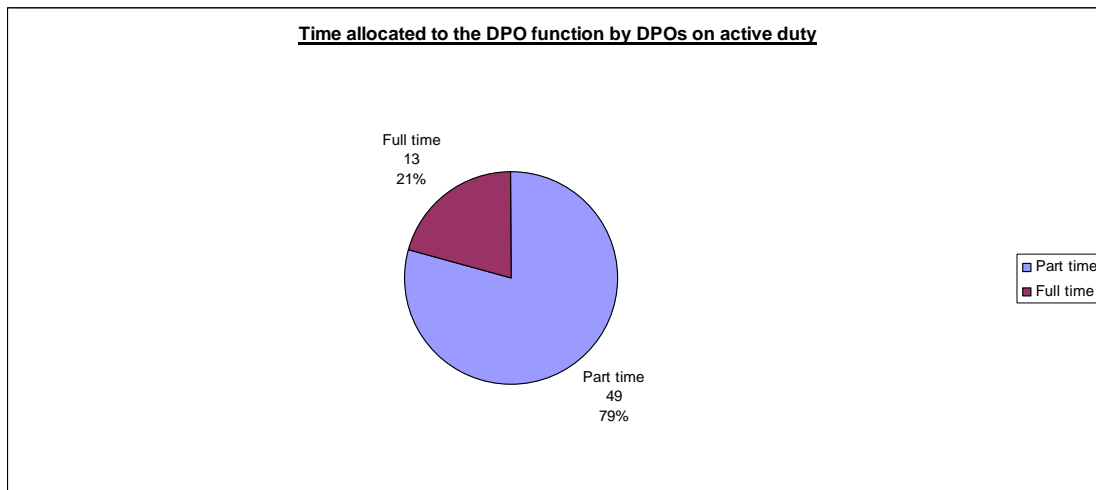
a) Time allocated to the DPO function

According to paragraph 5 of the Annex to the Regulation, the appointing institution or body shall relieve the DPO of other activities to the extent required.

In the DPO Role Paper, the EDPS recommends the appointment of a full time DPO at least at the start of the function.

Also, the DPO Professional Standards Paper mentions as one of the best practices to help ensuring the independence of the DPO that *"the DPO should be able to dedicate his/her time fully to his/her DPO duties, especially for large institutions and bodies, and for smaller ones in the initial phase of establishing a data protection regime...."*

The following charts show that full time appointment is only the case for 21% of the DPOs in office, albeit in slight progress compared to the situation of former DPOs (18%).



In view of the limited resources of many EU institutions and bodies amid the present climate of austerity, the EDPS would point out that allowing the DPO to dedicate sufficient time to data protection at the beginning of their mandate is not only a legal obligation, but also a matter of good governance and of proven cost effectiveness. Information and raising awareness of data protection at the outset is essential. This is equally valid as concerns acquiring sufficient knowledge of the Regulation and for establishing an inventory as well as a register of processing operations. Indeed these basic tasks of the DPO are critical for developing a data protection culture in the institution/body and for reducing the risks of failing to comply with the Regulation¹⁰. These tasks are time consuming and should be rapidly carried out and/or completed.

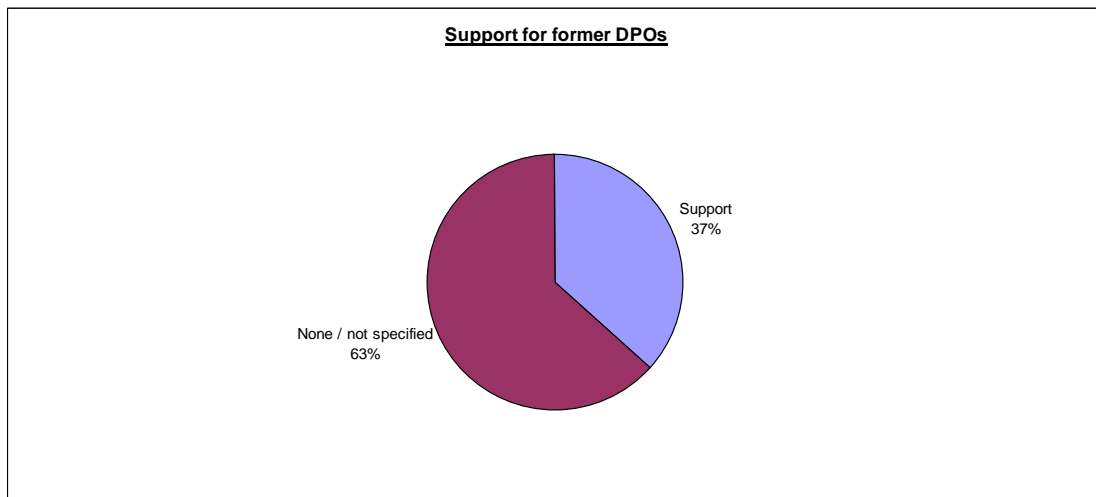
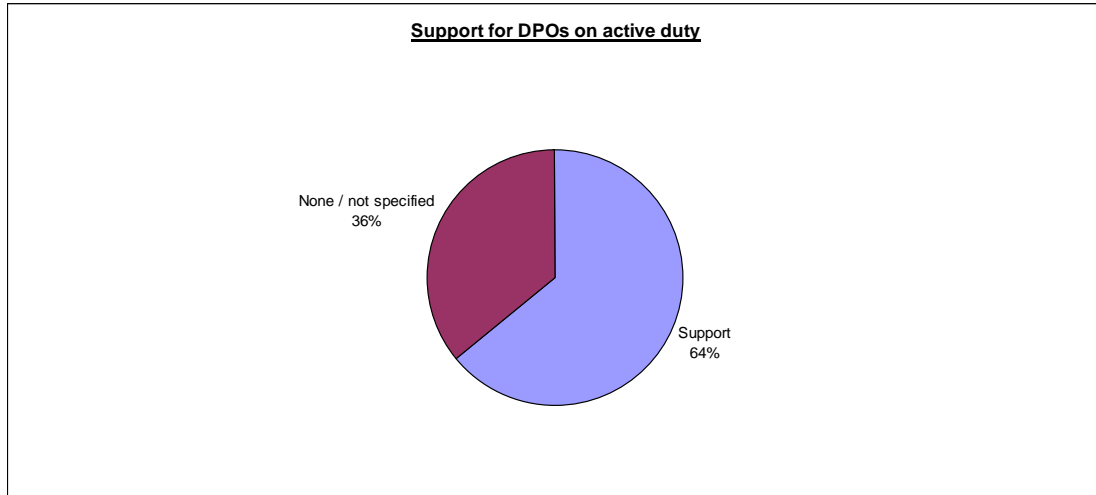
b) Support provided to the DPO

Article 24.6 of the Regulation sets out that the appointing institution/body has to provide the DPO with the staff and resources necessary to carry out his/her duties.

¹⁰ See ruling of the Civil Service Tribunal of 11 July 2011 in V vs EP, F-46/09 in which the Tribunal imposed a fine of €25000 for breach of Regulation EC 45/2001.

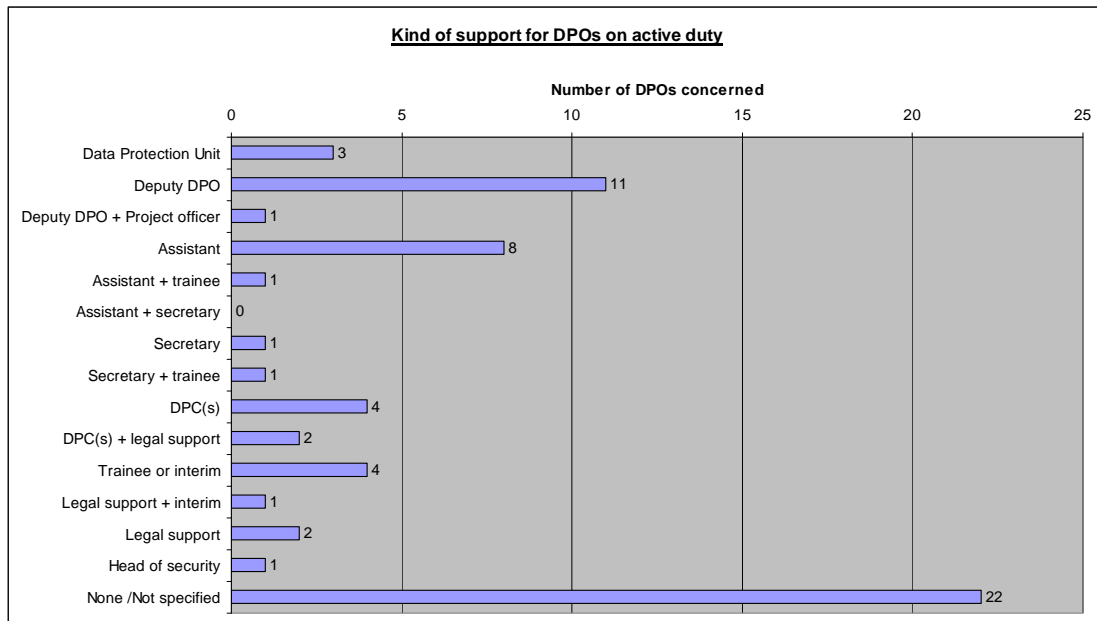
Information given by institutions/bodies relates only to staff support. While this is the most important element it is to be noted, as already mentioned in the DPO Role Paper, that the support to be given may also include IT and financial resources.

As shown below two-thirds (64%) of the DPOs in office were given staff support while the others (36%) either have not received such support or this has not been specified. The EDPS considers that this result is satisfactory given in particular that the level of support given to former DPOs has been much lower (37%).

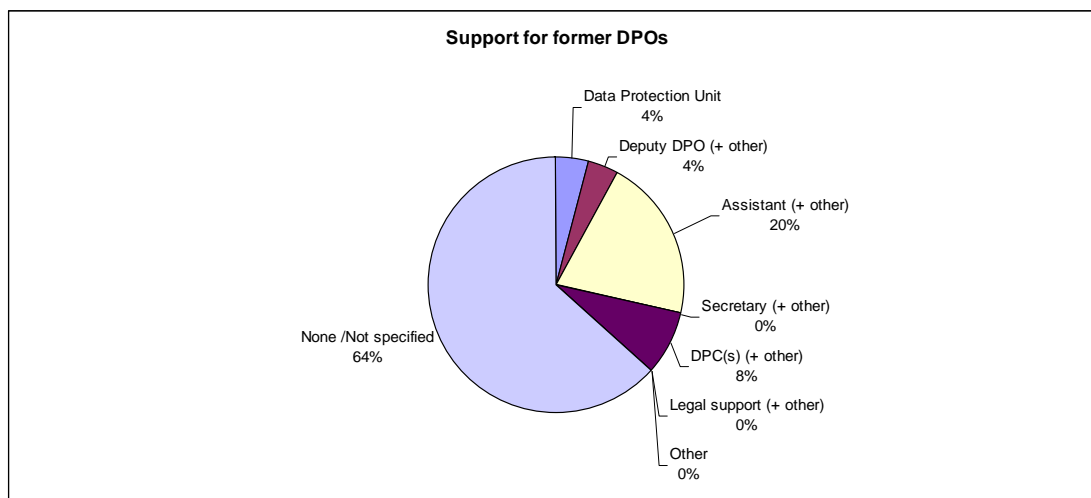
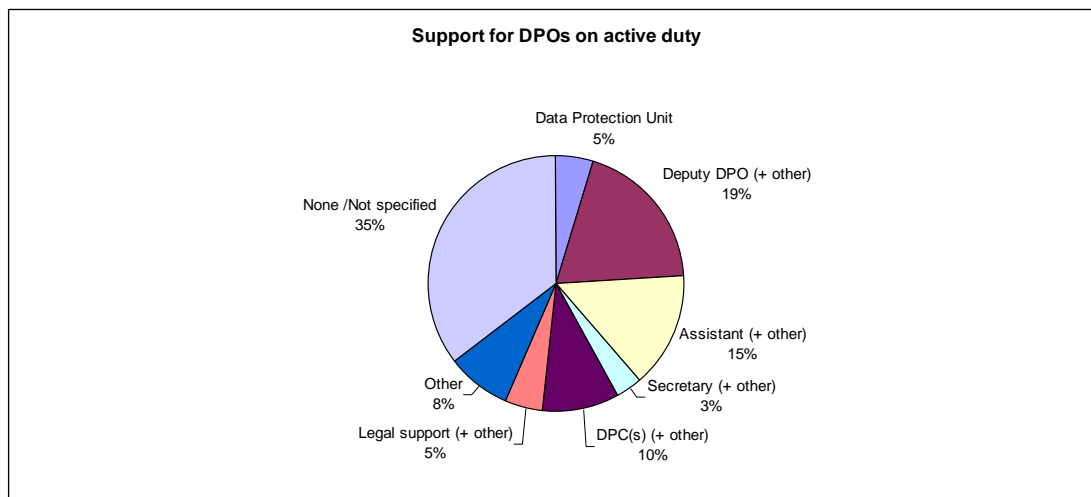


The following chart indicates that 40 DPOs have received support while for 22 DPOs either they have received none or this information has not been specified. As regards the kind of support, the chart shows the various combinations. It should be observed in particular that 3 DPOs are supported by a unit and 6 by Data Protection coordinators (DPC) while 12 are assisted by a deputy DPO and 8 by an assistant. The EDPS would encourage in particular the appointment of a deputy DPO or an assistant since this also contributes to the continuity of the function.

Other forms of support on a smaller scale are provided e.g. by lawyers, secretaries, interim staff and trainees.



The following two charts present the same information in a different way. The results are given in percentage related to the share of the main type of support. The first one confirms the observations already made while the second demonstrates the significant progress achieved in particular as regards support by a DP Unit, a deputy DPO or DPCs.



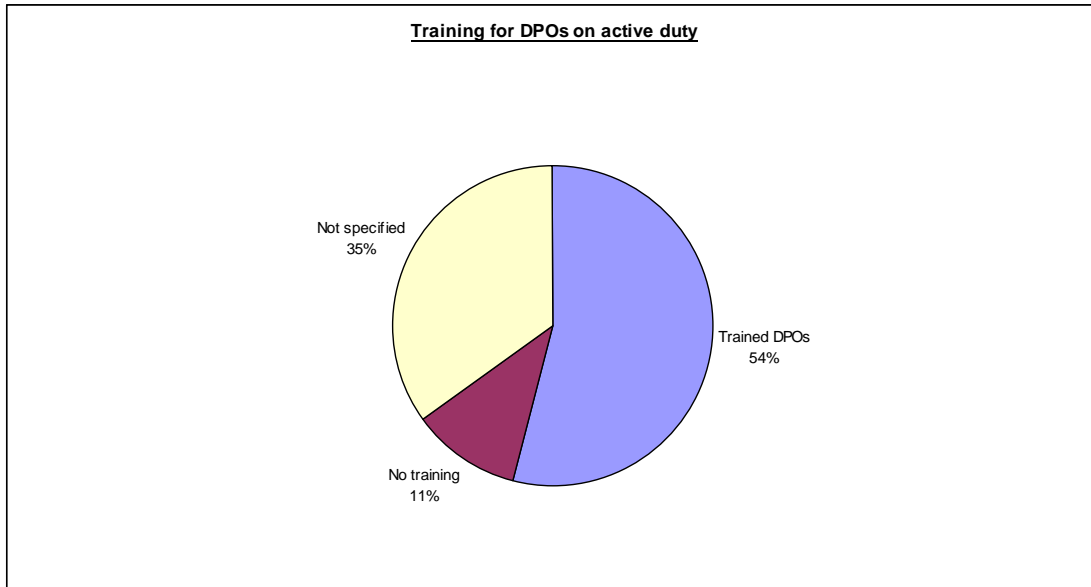
c) Training undergone by the DPOs

As already pointed out by the EDPS in his DPO Role Paper a good working knowledge of EU data protection law, in particular the Regulation, is a prerequisite to the DPO function. He has also noted that providing the DPO with adequate resources could include training sessions on the subject at the time of entry into function and regular updates in the course of their career.

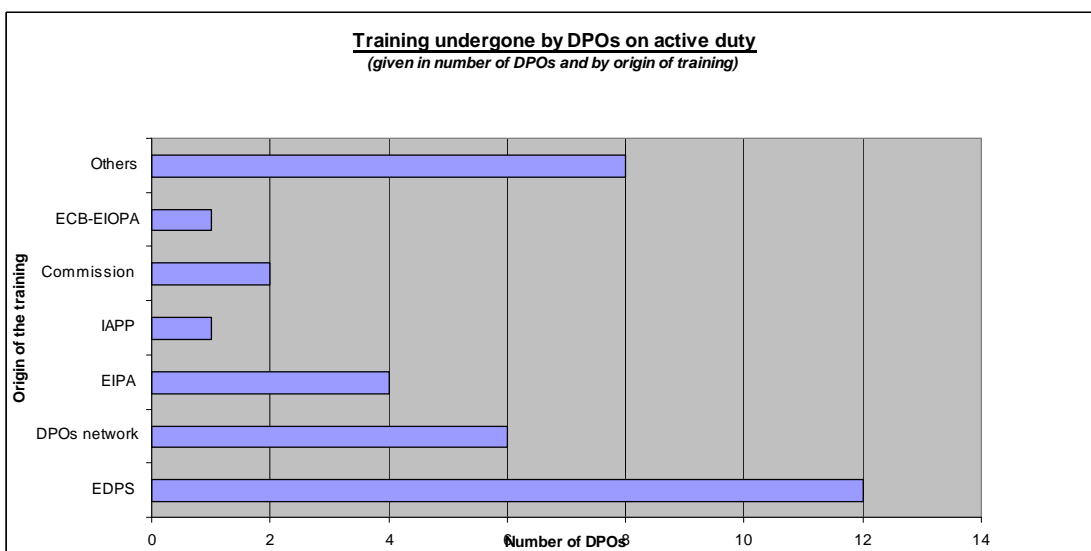
Another important aspect identified in the DPO Professional Standards Paper of the EU institutions/bodies is the fact the DPO function requires ideally both expertise in the area of EU privacy/data protection law and in IT including IT security. Since this combination of knowledge is rarely present at the outset it

is even more important for a DPO to develop their weakest knowledge area with appropriate training.

The following chart gives a first indication of the level of training of the DPOs in office. Just over half of them (54%) have received training while 11% appear to have received no training at all. At first sight this result seems rather disappointing. However it should be noted that no information has been provided for 35% of DPOs. The EDPS would expect the actual percentage of trained DPOs to be higher since most DPOs follow at least the training sessions organised by the EDPS and the meetings of the DPO network.



As regards the source of the training undergone by those DPOs in office the survey provided the following information: training sessions and introductory bilateral meetings organised by the EDPS (12), participation in the DPO network (6), EIPA (4), Commission (2), IAPP certification (1), bilateral training ECB-EIOPA (1) and various other trainings (8).



6. Conclusion

The answers given to the EDPS' questionnaire on the Status of the DPO provide a first general view of the application of Article 24 of the Regulation by the EU institutions and bodies after more than ten years of application of the Regulation.

This information shows that the DPO function is now well established within EU institutions and bodies and that there has been clear progress by most EU institutions and bodies in complying with Article 24. The EDPS welcomes in particular the designation of a DPO by almost all EU institutions and bodies, the general compliance with a term of office between two and five years, the experience already achieved within the DPO network, the administrative attachment of the majority of the DPOs to the Head of the institution/body and the existence of significant staff support for many DPOs.

However the answers also reveal several areas of concern. The EDPS intends to closely monitor in particular the precise statement of the term of office in the implementing rules and in the appointment decision, the actual duration of the mandate of the DPOs who are members of contract staff, the existence of a high DPO turnover, the possible situations of conflict of interests in particular for part time DPOs attached to the Administration. Where necessary such issues will be addressed by the EDPS on a case by case basis.

These findings are also an opportunity for the EDPS to restate his recommendations in particular concerning the setting of a term of office of five years to guarantee both independence and expertise, the designation of a deputy DPO or a DPO ad interim and the allocation of sufficient time to the DPO function especially at the beginning of the mandate of part time DPOs.

Although the information provided on training undergone by DPOs does not give a full picture of reality, it demonstrates that the most important training opportunities are provided by the EDPS and by the DPO network. The EDPS acknowledges however that further progress has to be made in this area and he intends to discuss this with the DPO network.

Annex (1) Groups of institutions and bodies

Group A (12): Institutions and bodies that were founded before 2004 and had appointed a DPO before the establishment of the EDPS:

Centre of translations, Commission, Committee of the Regions, Council, Court of Auditors, European Court of Justice, European Central Bank, European Investment bank, European Parliament, European Economic and Social Committee, OLAF, European Ombudsman,

Group B (17): Bodies that were established (or started their activities) before, 2004 but appointed a DPO at a later stage:

CEDEFOP, CPVO, EACI, EASA, EEA, EFSA, EIF, EMA, EMCDDA EMSA, ETF, EUROFOUND, FRA, OHIM, OSHA.

Group C (18): Bodies established (or have started their activities) as from 2004:

ARTEMIS JU, CLEANSKY JU, EFCA, EACEA, EAHC, ECDC, ECHA, EDPS, ENIAC JU, ENISA, ERA, ERCEA, F4E, FCH JU, FRONTEX, GSA, IMI JU, REA, SESAR, TEN-TEA.

Group D (13): Bodies established after 2011 and former second and third pillar bodies:

ACER, BEREC, CEPOL, EASO, EBA, EDA, EEAS, EIGE, EIOPA, EIT, ESMA, ESRB, EUSC.

Bodies subject to a specific Data Protection legal framework (2):

EUROPOL, EUROJUST

Annex (2) List of institutional acronyms

ACER	Agency for the Cooperation of Energy Regulators
ARTEMIS JU	ARTEMIS Joint Undertaking
BEREC	Body of European Regulators for Electronic Communications
CDT	Centre de Traduction
Cedefop	European Centre for the Development of Vocational Training
CEPOL	European Police College
Cleansky JU	Clean Sky Joint Undertaking
CoR	Committee of the Regions
Council	Council of the European Union
CJEU	Court of Justice of the European Union
COM	European Commission
CPVO	Community Plant Variety Office
EACEA	Education, Audiovisual and Culture Executive Agency
EACI	Executive Agency for Competitiveness & Innovation
EAHC	Executive Agency for Health and Consumers
EASA	European Aviation Safety Agency
EASO	European Asylum Support Office
EBA	European Banking Authority
ECA	European Court of Auditors
ECB	European Central Bank
ECDC	European Centre for Disease Prevention and Control
ECHA	European Chemicals Agency
EDA	European Defence Agency
EDPS	European Data Protection Supervisor
EEA	European Environment Agency
EEAS	European External Action Service
EESC	European Economic and Social Committee
EFCA	European Fisheries Control Agency
EFSA	European Food Safety Authority
EIB	European Investment Bank
EIF	European Investment Fund
EIGE	European Institute For Gender Equality
EIOPA	European Insurance and Occupational Pensions Authority
EIT	European Institute of Innovation and Technology
EMCDDA	European Monitoring Centre for Drugs and Drug Addiction
EMA	European Medicines Agency
EMSA	European Maritime Safety Agency
ENIAC JU	ENIAC Joint Undertaking
ENISA	European Network and Information Security Agency
EP	European Parliament
ERA	European Railway Agency
ERCEA	European Research Council Executive Agency
ESRB	European Systemic Risk Board
ESMA	European Securities and Markets Authority
ETF	European Training Foundation
EUROFOUND	European Foundation for the Improvement of Living and Working Conditions
EUSC	European Union Satellite Centre
F4E	Fusion for Energy
FRA	European Union Agency for Fundamental Rights

Frontex	European Agency for the Management of Operational Cooperation at the External Borders of the Member States of the European Union
FCH JU	Fuel Cells and Hydrogen Joint Undertaking
GSA	European Global Navigation Satellite Systems Agency
IMI JU	Innovative Medicines Initiative Joint Undertaking
OHIM	Office of Harmonization for the Internal Market
OLAF	European Anti-fraud Office
Ombudsman	European Ombudsman
OSHA	European Agency for Safety and Health at Work
REA	Research Executive Agency
SESAR	Single European Sky ATM Research Joint Undertaking
TEN-T EA	Trans-European Transport Network Executive Agency

Annex (3) Comparative table of results: Mandate

(received by 30 September 2012 and arranged by Group in alphabetical order)

	Group A
	Group B
	Group C
	Group D
	Bodies subject to specific DP rules

		Duration of mandate	Cumulative years of appointment	Real term of office
CDT	1	2 years	< 1 year	01/10/2011 -
	2	2 years	> 9 years	30/1/2002-30/9/2011
COM	1	5 years	7 years	16/4/2006 -
	2	n.a.	5 years	1/7/2002 - 31/8/2005
CoR	1	2 years	> 2 years	15/7/2010 -
	2	1 year	1 year	16/3/2009 - 14/7/2010
	3	1 year	> 5 years	1/10/2007 - 15/3/2009 1/1/2003 - 31/7/2007
	4	Replacement	< 1 year	1/8/2007 - 30/9/2007
Council	1	3 years	> 1 year	1/3/2011 -
	2	3 years	> 9 years	1/12/2001 - 28/2/2011
ECA(COA)	1	5 years	2 years	1/6/2010 -
	2	5 years	> 8 years	1/10/2002 - 31/5/2010
ECJ	1	2 years	< 1 year	17/10/2011-
	2	2 + 5 + 3 years	10 years	16/10/2001-15/10/2011
ECB	1	4 years 2,5 months	> 2 years	15/10/2009 - (31/12/2013)
	2	3 years	3 Years	1/1/2007 - 14/10/2009
	3	3 years	5 Years	1/1/2002 - 31/12/2006
EIB	1	3 years		1/6/2012 -
	2	3 years	10 years	1/6/2002 - 31/5/2012
EP	1	5 years	< 1 year	1/3/2012 -

	2	5 years	10 years	1/2/2002 - 28/2/2012
EESC	1	3 Years	5 years	15/1/2008 - (14/1/2013)
	2	3 Years	< 1 year	7/6/2007 - 31/12/2007
	3	3 Years	2 years	21/3/2005 - 20/3/2007
	4	3 Years	4 years	1/2/2001 - 31/12/2004
OLAF	1	2 years	> 6 years	8/3/2006 - (7/3/2013)
	2	Not specified	> 4 years	1/2/2002 - 7/3/2006
OMBUDSMAN	1	2 years	< 1 year	15/3/2012 -
	2	2 years	6 years	1/3/2006 - 14/3/2012
	3	2 years	< 2 years	1/5/2004 - 28/2/2006
	4	2 years	2 years	15/4/2002 - 30/4/2004
	5	2 years	2 years	9/2/2000 - 14/4/2002
CEDEFOP	1	4 years 8 months	> 5 years	14/8/2006 - (1/8/2016)
	1	4 years 8 months	< 1 year	1/1/2012 - (1/8/2016)
CPVO	1	2 years	7 years	24/4/2007 - (23/4/2014)
	2	2 years	2 years	11/3/2005 - 11/3/2007
EACI	1	2 years	> 4 years	1/7/2008 - (1/7/2014)
	2	2 years	> 1 year	28/3/2007 - 01/7/2008
EASA	1	Acting DPO	< 1 year	27/4/2012 - (3/3/2013)
	1	5 years	< 3 years	17/9/2009 - (31/7/2014)
	2			
EEA	1	2 years (renewable)	> 1 year	22/3/2011 -
	2	2 years (renewable)	4 years	21/3/2007 - 21/3/2011
EFSA	1	3 years	6 years	1/2/2006 -
EIF	1	3 years	4 years	01/11/2007 -
	2	3 years	7 years	11/6/2002 - 31/10/2007
EMA (EMEA)	1	3 years	1 year	1/7/2011 -
	2	3 years	6 years	1/7/2005 - 30/6/2011
EMCDDA	1	2 years	1 year	13/7/2011 -

	2	2 years	4 years	1/7/2007 - 13/7/2011
	3	not specified	> 1 year	2/8/2005 - 30/6/2007
EMSA	1	3 years		1/5/2007 -
	2	3 years	> 1 year	1/1/2006 - 1/5/2007
ETF	1	3 years	1 year	01/5/2011 - (30/4/2014)
	2	not specified	> 2 years	1/9/2008 - 30/4/2011
	3	ad interim	1 year	16/9/2007 - 31/8/2008
	4	not specified	> 1 year	3/1/2006 - 15/9/2007
	5	not specified	< 1 year	30/9/2005 - 2/1/2006
	6	not specified	> 5 years	7/8/2000 - 29/9/2005
EUROFOUND	1	5 years	6 years	1/6/2006 -
FRA	1	4 years	> 4 year	26/11/2007 - (25/11/2015)
	2	11 months	< 1 year	16/01/2007 - 25/11/2007
	3	4 years	4 years	2002 - 2006
OHIM	1	2 years	2 years	1/4/2012 -
	2	2 years	4 years	1/4/2008 - 31/3/2012
	3	2 years	2 years	1/4/2006 - 31/3/2008
OSHA	1	2-5 years (IR)	< 1 year	01/9/2011 -
	2	2-5 years (IR)	4 years	25/9/2007 - 31/8/2011
Artemis	1	3 years	> 2 years	3/11/2009 - (15/10/2012)
Cleansky	1	4 months	< 1 year	18/6/2012 - (31/10/2012)
	2	3 years	> 2 years	4/12/2009 - 17/6/2012
EACEA	1	2 years / 4 years	> 5 years	09/1/2007 - (31/12/2015)
EAHC	1	2 years	> 4 years	15/5/2009 -
	2	1 year 3,5 months	> 1 year	14/9/2007 - 31/12/2008
ECDC	1	5 years	< 1 year	01/11/2011 -
	2	2 years (renewable)	4 years (2+1+1)	01/8/2007 - 28/2/2011
ECHA	1	2 years	< 2 years	01/11/2010 - (31/10/2012)
	2	2 years	2 years	01/11/2008 - 31/10/2010

EDPS	1	2 years	< 1 year	16/3/2011 -
	2	2 years	< 1 year	1/9/2010 - 15/3/2011
	3	2 years	> 2 years	1/2/2007 - 31/8/2010
EFCA	1	5 + 2 years	> 5 years	30/5/2007 - (29/5/2014)
	1			
ENIAC JU	1	3 years	< 1 year	27/09/2011 - (27/9/2014)
ENISA	1	5 years	1 year	18/7/2011 -
	2	Not specified	> 2 years	1/3/2009 - 17/7/2011
	3	Not specified	> 3 years	19/12/2005 - 28/2/2209
ERA	1	5 years	> 1 year	1/1/2011-(15/10/2016)
	2	assistant DPO - DPO ai	> 1 year	1/10/2009 - 1/1/2011
	3		> 2 years	8/5/2007 - 31/10/2009
ERCEA	1	1 year	< 1 year	1/12/2011 -
F4E	1	2 years		1/7/2012 -
	2	5 years	3 years	1/6/2009 - 30/6/2012
FCH JU	1	3 years	> 2 years	12/1/2013 -
FRONTEX	1	3 years	> 4 year	23/9/2007 - (23/9/2013)
GSA (GNSS)	1	2 years + 3 years	3 years	4/8/2009 - (30/6/2014)
	2	1 year 4 months	> 1 year	3/3/2008 - 5/2009
IMI	1	3 years	> 2 years	6/11/2009 - (15/9/2012)
REA	1	5 years	3 years	6/4/2009 - (31/3/2014)
SESAAR	1	1 year + 5 years	3 years	01/07/2009 - (28/2/2015)
TEN-TEA	1	4 years	2 years	14/7/2010 -
	2	2 years	> 2 years	9/4/2008-30/6/2010
ACER	1	3 years	< 1 year	20/12/2011 -

BEREC	1	2 years	n/a	29/06/2012 -
CEPOL	1	3 years	< 1 year	20/09/2011 -
EASO	1	5 years	< 1 year	1/5/2012 -
EBA	1	5 years	> 1 year	5/5/2011 -
EDA	1	2 years	< 1 year	30/9/2011 -
EEAS	1	5 years	< 1 year	8/12/2011 -
	1	ad interim	< 1 year	16/3/2012 -
EIGE	1	5 years	2 years	13/4/2010 -
EIOPA	1	5 years	> 1 year	26/4/2011 -
EIT	1	4 years	> 1 year	01/02/2011-
	1	Back up DPO	< 1 year	01/03/2012-
	2	4 years	4 years	07/05/2010-31/01/2011
ESMA	1			
ESRB	1	2 Years 10 months	> 1 year	25/3/2011 - (31/12/2013)
EUISS	1			
EUSC	1	5 years	> 2 years	10/5/2010 - (10/5/2015)
EUROPOL	1	5 years	> 2 years	05/2/2010 - (31/1/2015)
EUROJUST	1	na	> 8 years	16/11/2003 -

Annex (4) Comparative table of results: Position

(received by 30 September 2012 and arranged by Group in alphabetical order)

	Group A
	Group B
	Group C
	Group D
	Bodies subject to specific DP rules

		Position	
		Function	Administrative attachment
CDT	1	Planning and Quality Administrator	Director
	2	Head of IT	Director
COM	1	DPO	SG.DSG1.DP
	2	DPO-Adviser	SG.03/DPO
CoR	1	Legal Adviser	Legal service
	2	Legal Adviser	Legal service
	3	Legal Adviser	Legal service
	4	Legal Adviser	Legal service
Council	1	Head of unit	Secretary General
	2	Head of unit	(Deputy) Secretary General
ECA(COA)	1	Information Security Officer	Director Finance & Support
	2	Legal adviser	Secretary General
ECJ	1	Legal Adviser for Administrative Affaires	Registrar of ECJ
	2	Legal Adviser for Administrative Affaires	Registrar of ECJ
ECB	1	Adviser	Legal Services
	2	Adviser	Directorate General Legal Services
	3	Senior Organisation Expert	Directorate General HR, Budget & Organisation

EIB	1	Senior Lawyer	General Secretariat
	2	Managerial Advisor	Legal Service
EP	1	Administrator - information specialist	Secretary General
	2	Legal Adviser	General Director DG Personnel, Jurisconsult (from 2012)
EESC	1	Legal Adviser	Legal Service
	2	Adviser	General Affairs Director
	3	Legal Adviser	Legal Service
	4	Adviser	
OLAF	1	Sr Administrator	Director General
	2	Sr Administrator	Director General
OMBUDSMAN	1	Legal Officer	Directorate A
	2	Head of Sector/Unit	Administration Finance Dept.
	3	Legal Officer/ Head of Sector	Administration Finance Dept.
	4	Director	Legal Dept..
	5	Legal Officer	Legal Dept..
CEDEFOP	1	Senior Expert of ICT	Director
	1	Senior Expert System Librarian	Director
CPVO	1	Assistant	Legal service
	2		
EACI	1	Legal Advisor	Unit Resources
	2		
EASA	1	Chief Legal Advisor	
	1		
	2		
EEA	1	Legal adviser	Head of Administrative Services
	2	Deputy Director Head of Programme	Executive Director
EFSA	1	Legal officer	Legal & Regulatory Affairs Unit

EIF	1	Head of COR	Deputy Chief executive
	2	Legal Adviser - DPO of EIB	Chief Executive
EMA (EMEA)	1	Legal Administrator	Directorate
	2	Head of Legal Sector	Directorate
EMCDDA	1	Principal Policy Officer, Diplomatic Relations	Director
	2	Senior Policy Officer, International cooperation coordinator	Director
	3	Compliance Officer	Director
EMSA	1	Senior Legal Officer	Environmental Protection Unit
	2	Legal Adviser	Legal Service
ETF	1	Legal Adviser	Director
	2	Assistant to the Director	Director
	3	Legal Adviser	Head of Administration Dept.
	4	Internal Auditor	Director
	5	Head of Administration Dept.	Director
	6	Head of Human Resources	Head of Administration Dept.
EUROFOUND	1	Head of Administration (not in charge of HR function)	Director
FRA	1	Software development expert:Head of Sector ICT & Facilities	Acting Director
	2	Senior Procurement Officer	Director
	3	Programme Manager - Legal Researcher	Director
OHIM	1	Legal Adviser	Legal service
	2	Legal Adviser	Legal service (3y)/ HR Director (1y)
	3	Administrative Assistant	Quality Management System Dept
OSHA	1	Head of Prevention and Research Unit	Operational Unit
	2	Head of Working Environment Information Unit	Operational Unit

Artemis	1	Legal Officer	Executive Director
Cleansky	1	Legal officer	Head of unit
	2	Legal officer	Head of unit
EACEA	1	Legal adviser, Head of the legal sector	Finance, Accounting, Programming Unit (EACEA R2)
EAHC	1	Legal advisor	Administration Unit
	2	Internal Auditor	Directorate
ECDC	1	Senior Legal Advisor	Head of Legal and Procurement Section
	2	Senior Legal Advisor	Head of Legal and Procurement Section
ECHA	1	Head of the Executive Office	Executive Director
	2	Head of the Legal Affairs Unit	Executive Director
EFCA	1	Legal officer	Administration Unit
	1		
EDPS	1	HR officer	(HR Unit)/Director
	2	Legal officer	(Policy team)/Director
	3	HR officer	Head of Unit/Director
ENIAC JU	1	Head Administration and Finance	Executive Director
ENISA	1	Expert EU Relations	Technical Competence Dept.
	2	Legal Advisor	Administration Dept.
	3	Legal Advisor, Head of Administration (from 1/2007)	Administration Dept.
ERA	1	Legal adviser	Head of Executive Director's Office
	2	Legal officer	Executive Director
	3	Legal adviser	Head of Executive Director's Office
ERCEA	1	Legal Adviser	Executive Director
F4E	1	Senior officer	Office of the Director
	2	Legal adviser	Office of the Director
FCH JU	1	Legal Manager	Administration and finance unit
FRONTEX	1	Head of Legal Affairs Unit	Legal Affairs Unit

GSA (GNSS)	1	Procurement and contracts Officer	Legal Dept.
	2	Head of HR	Human Resources
IMI	1	Policy and Legal Manager	Head of Admin / Finances
REA	1	IT Officer	REA.A3.002 - ICT
SESAR	1	HR officer	Deputy Executive Director
TEN-TEA	1	Legal Adviser	Legal Team, Unit Technical and Financial Engineering, GIS & Monitoring
	2	Legal Adviser	Unit Resources, Unit Technical and Financial Engineering GIS & Monitoring
ACER	1	Legal Adviser	Director's Office
BEREC	1	Legal Officer	Administration and Finance Unit
CEPOL	1	Quality manager	Director's staff
EASO	1	Document Manager Officer	
EBA	1	Legal expert	Executive Director
EDA	1	Security Officer	Director CSD
EEAS	1	Policy Officer	Corporate Board Secretariat
	1	Deputy Head of Division	Corporate Board Secretariat
EIGE	1	ICT agent	Head of Administration
EIOPA	1	Legal adviser	Director of Operations
EIT	1	Legal Adviser	Directorate
	1	Financial Verifying Agent	Resources Unit
	2	IT Officer	Resources Unit
ESMA	1		
ESRB	1	Adviser/ECB DPO	ECB Directorate General Legal Services in the capacity as ECB DPO
EUSS	1		
EUSC	1	Legal Officer	Head of Administration

EUROPOL	1	Head of Unit	Governance Dept.
EUROJUST	1	Head of the Data protection service	Administrative Director/ President of the College

Annex (5) Comparative table of results: Resources

(received by 30 September 2012 and arranged by Group in alphabetical order)

	Group A
	Group B
	Group C
	Group D
	Bodies subject to specific DP rules

		Resources		
		Time	Support	Training
CDT	1	part time	-	Trainings organised by the EDPS
	2	part time	-	
COM	1	Full time	2 Assistants	No specific DPO training
	2	Full time	1 Assistant, 1 Secretary	No specific DPO training
CoR	1	Part time	trainee	
	2	Part time	1 Assistant	
	3	Part time		
	4	Part time		
Council	1	Full time	DPU (3 officials)	n/a
	2	Full time	DPU (from 1 to 3 officials)	n/a
ECA(COA)	1	Part time	Stagiaire (4 months) + secretarial support	52 CPE in 2011, 40 CPE in 2010
	2	Full time	Assistant	
ECJ	1	Part time	1 dedicated AST	-
	2	Part time	1 dedicated AST	-

ECB	1	Part time (50%)	Deputy DPO foreseen in IR (not appointed), 6 to 7 DPCs, lawyers from Legal Services	various trainings, meetings, conferences on DP
	2	Part time (50%)		various trainings, meetings, conferences on DP
	3	Part time (50%)	Assisted by a DP Expert (full time)	various trainings, meetings, conferences on DP
EIB	1	Full time	assistant 100%, trainee	yes
	2	Part time 50%	assistant 100% (50% 2004-2007), trainees	yes
EP	1	Full time	Assistant	Yes
	2	Full time	Assistant	Yes
EESC	1	Part time		
	2	Part time		
	3	Part time		
	4	Part time		
OLAF	1	Full time	none	
	2	Full time	none	
OMBUDSMAN	1	Part time		- Two ERA events co-organised with the EDPS on data protection in the area of law enforcement - Masters thesis on data protection co-financed by the Ombudsman
	2	Part time	Assistant	Yes
	3	Part time		No
	4	Part time		No
	5	Part time		No

CEDEFOP	1	Part time (25%)	Legal adviser / DPO	training by EDPS and all DPO network meetings
	1	Part time (20%)	-	Not yet
CPVO	1	Part time	trainee if needed	
	2			
EACI	1	Part time	Deputy DPO	Commission training
	2			
EASA	1			
	1			
	2			
EEA	1	Part time	DPC (part time)	
	2	Part time	Assistant (part time)	
EFSA	1	Part time (50%)	Secretary of LRA Unit	Network of DPO/EDPS
EIF	1	Part time		
	2	Part time		
EMA (EMEA)	1	Part time	Deputy DPO	
	2	Part time	Deputy DPO	
EMCDDA	1	Part time	none	EIPA Seminar / DPO network meetings
	2	Part time	none	DPO network meetings
	3	Part time	none	DPO network meetings
EMSA	1	Part time	none	Training by EDPS and DPOs'network meeting
	2	Part time	none	Training by EDPS and DPOs'network meeting
ETF	1	Part time	Support by junior Legal Advisor	Training organised by EDPS, EDPS visits, bilateral meeting at EDPS, DPOs meetings
	2	Part time	none	
	3	Part time	none	

	4	Part time	none	
	5	Part time	none	
	6	Part time	none	
EUROFOUND	1	Part time	Deputy DPO and project officer	Training organised by EDPS
FRA	1	Part time 10%	Trainees for 1,5 years	
	2	Part time		
	3	Part time		
OHIM	1	Part time	DPO Assistant	-
	2	Part time	DPO Assistant	-
	3	Part time/ Full time	-	-
OSHA	1	Part time	DPO Assistant	
	2	Part time	DPO Assistant	EDPS training for DPOs
Artemis	1	Part time	no	no
Cleansky	1	Full time	n/a	No
	2	Full time	n/a	Yes
EACEA	1	Part time	Deputy DPO (December 2009)	Yes
EAHC	1	Part time	Deputy DPO	No
	2	Part time	No	No
ECDC	1	Part time	assistant	yes
	2	Part time	assistant	yes
ECHA	1	Part time	Deputy DPO	
	2	Part time	Deputy DPO	
EDPS	1	Part time		DP expert IAPP
	2	Part time	Assistant DPO	DP expert
	3	Part time		
EFCA	1	Part time	Backup DPO	Training by EDPS
	1			

ENIAC JU	1	Part time	none	in a previous position
ENISA	1	Part time	Deputy DPO	EIPA
	2	Part time	Deputy DPO	None
	3	Part time		None
ERA	1	Part time	n/a	trainings organised by EDPS
	2	Part time	n/a	training on DPO by EIPA
	3	Part time	n/a	trainings organised by EDPS
ERCEA	1	Full time until 9/2012	Legal service (where needed), interimaire until 9/2012	EC training on DP
F4E	1	Part time		
	2	Part time	Deputy DPO	Trainings by EDPS and DPO network
FCH JU	1	Part time		
FRONTEX	1	Part time	Legal Assistant	None
GSA (GNSS)	1	Part time	None	Self-training, DPO meetings
	2	Full time	None	No information
IMI	1	Part time	No	
REA	1	Part time	interim agent (6 months)	
SESAR	1	Part time		EDPS training/external training
TEN-TEA	1	Part time	2 Deputy DPOs	courses of EDPS & of Commission
	2	Part time	none	
ACER	1	PartTime	Deputy DPO	
BEREC	1			
CEPOL	1	Part time		
EASO	1			
EBA	1	Part time		
EDA	1	Full time	Head of Security	

EEAS	1	Part Time	DP assistant (from 1/7/2012)	EIPA training (2 days)
	1	Part time	DP assistant (from 1/7/2012)	
EIGE	1	Part time	Deputy DPO	
EIOPA	1	Part time	n/a	Seminars EDPS/ EIPA/ Bilateral training ECB- EIOPA
EIT	1	Full time	Back up DPO	-
	1	Part time	-	-
	2	Full time	-	-
ESMA	1			
ESRB	1	Part time	Deputy DPO foreseen in draft IR (not appointed), 1 DPC in charge of the ESRB and -upon request- by dedicated lawyer(s) from ECB Directorate General Legal Services	(1)DPO network meetings (2) training by the EDPS (3) external conferences on DP (4) ESCB Experts network meetings on DP (5) meetings of the International Banking Privacy Group (6) member of the German Association for DP and Data Security (7) subscription to legal journals on DP
EUISS	1			
EUSC	1	Part time	DPO Assistant	
EUROPOL	1	Full time	DP Unit	(1) Data Protection in Public Sector, (2) Data Security Training SANS
EUROJUST	1	Full time	Assistant, Techn. Advisor and Secretary	