

## How the European Central Bank (ECB) deals with 'revolving door' cases (OI/1/2022/KR)

Case opened

**Case** OI/1/2022/KR - **Opened on** 01/03/2022 - **Decision on** 26/10/2022 - **Institution concerned** European Central Bank ( No further inquiries justified ) |

Ms Christine Lagarde

President

European Central Bank

Dear President,

As Ombudsman, I have increasingly encouraged EU institutions to take a robust approach in assessing cases where (senior) staff members leave the EU civil service to take up new positions and particularly in the private sector. This is vital for ensuring public trust in the EU institutions and the important work that they do. Recent inquiries cover the European Commission [1] , the European Investment Bank [2] , the European Banking Authority [3] and the European Defence Agency [4] .

I have now decided to inquire into the ECB's policies and practices in this area.

My inquiry will include a recent case as regards a former ECB 'senior economist', who took up employment with a US investment bank. The former ECB staff member's new job relates to his previous area of work at the ECB.

It would be helpful for my inquiry team to inspect any documents in the ECB's file on the former ECB staff member's prospective post-employment, including any documents on the ECB's measures to mitigate risks of conflicts of interest ahead of the former staff member's departure. Please make available any documents that the ECB identifies related to this request by 24 March 2022.

It would also be helpful if the ECB could provide, if possible by 15 April 2022, a statistical overview of staff members (divided between salary bands I and above and salary bands F to H, and per directorate-general and directorate) that have left the ECB in 2020 and 2021, to take up



positions outside the EU institutions, bodies, offices and agencies.

Please indicate as well, in how many cases the ECB applied:

- A notification obligation and if so, which periods applied;
- On its own initiative, mitigating measures while the outgoing staff member was still in service;
- Post-employment restrictions.

Please also provide a copy of any internal guidance the ECB may have on the implementation of the ECB staff rules [5] .

Aside from the request for information and inspection, I would be grateful if a meeting could be organised between my inquiry team and ECB representatives on this subject before 13 May 2022. Agenda points will be shared in advance.

Your office can contact the inquiry officers responsible, Ms Angela Marcos Figueruelo or Mr Koen Roovers, to agree the arrangements for the (remote) inspection and meeting.

Yours sincerely,

Emily O'Reilly

European Ombudsman

Strasbourg, 01/03/2022

[1] See: <https://www.ombudsman.europa.eu/en/opening-summary/en/137680> [Link].

[2] See: <https://www.ombudsman.europa.eu/en/opening-summary/en/143413> [Link].

[3] See: <https://www.ombudsman.europa.eu/en/case/en/56050> [Link].

[4] See: <https://www.ombudsman.europa.eu/en/opening-summary/en/136536> [Link].

[5] See: [https://www.ecb.europa.eu/careers/pdf/staff\\_rules\\_fixedterm.pdf](https://www.ecb.europa.eu/careers/pdf/staff_rules_fixedterm.pdf) [Link], for staff with fixed term contracts, which are complemented by 'conditions of employment', see:

[https://www.ecb.europa.eu/careers/pdf/conditions\\_of\\_employment.pdf](https://www.ecb.europa.eu/careers/pdf/conditions_of_employment.pdf) [Link]. The ECB also has rules for short term employment

[https://www.bankingsupervision.europa.eu/careers/pdf/staff\\_rules\\_shortterm.pdf](https://www.bankingsupervision.europa.eu/careers/pdf/staff_rules_shortterm.pdf) [Link].