



Report

of the European Ombudsman following her visit to the European Institute for Gender Equality (EIGE) – OI/7/2013/EIS

The background to the visit

1. In May 2011, the European Ombudsman launched a programme of visits to the EU agencies with the aim of identifying and spreading best practices in their relations with citizens¹.

2. By letter of 6 December 2013, the Ombudsman informed the European Institute for Gender Equality ('EIGE') that she intended to visit it on 13 December 2013.

3. EIGE came into being upon the adoption of Regulation (EC) No 1922/2006² of the European Parliament and of the Council of 20 December 2006 on establishing a European Institute for Gender Equality (hereinafter referred to as the 'Founding Regulation'). The Institute was established in May 2007. According to Article 2 of the Founding Regulation, the general objectives of EIGE are to *"contribute to and strengthen the promotion of gender equality, including gender mainstreaming in all [EU] policies and the resulting national policies, and the fight against discrimination based on sex, and to raise EU citizens' awareness of gender equality by providing technical assistance to the [EU] institutions, in particular the Commission, and the authorities of the Member States"*. EIGE is based in Vilnius, Lithuania.

4. The Ombudsman sent EIGE a draft agenda with the specific issues she wished to discuss. In addition, the Ombudsman informed EIGE that, with a view to executing a commitment she had undertaken following a request by the Assembly of Agency Staff Committees ('AASC'), she intended to meet EIGE's Staff Committee during her visit.

The visit

5. The meeting took place at EIGE's premises on 13 December 2013. The Ombudsman was accompanied by Ms Eija Salonen, Legal Officer. EIGE was represented by Ms Virginija Langbakk, Director, who was accompanied by Mr

¹ Information on visits to the EU agencies is available on the following page of the Ombudsman's website: www.ombudsman.europa.eu/activities/visits.faces

² Regulation (EC) No 1922/2006 of the European Parliament and of the Council of 20 December 2006 on establishing a European Institute for Gender Equality, OJ 2006 L 403, p. 9.



Luigi Sandrin, Head of Administration and Ms Thérèse Murphy, Head of Operations. EIGE's Team Leaders were also present during the visit.

6. At the beginning of the meeting, the Ombudsman provided information on the purpose and context of her visit to EIGE. She clarified that she carries out her visits to agencies of the EU on the basis of her competence to conduct own-initiative inquiries. An own-initiative inquiry implies, among others, that the usual procedural guarantees concerning such inquiries apply. These include the Agency's right to request the Ombudsman to treat certain information and documents on a confidential basis, under the conditions laid down in Articles 5.1, 5.2 and 14.2 of the Ombudsman's Implementing Provisions³.

7. Following the Ombudsman's introductory remarks, EIGE first provided the Ombudsman with a general overview of its activities and then presented its position on the subjects identified by the Ombudsman in her letter of 6 December 2013. The persons in charge addressed the different agenda items with the help of hand-outs. At the end of the meeting, copies of the hand-outs and supporting documents were provided to the Ombudsman. Some further documents were also submitted to the Ombudsman on 16 December 2013.

8. The following issues were discussed between the Ombudsman and EIGE's management:

- A. The Public Service Principles;
- B. EIGE's initial contacts with the public;
- C. Transparency, dialogue and accountability;
- D. Recruitment;
- E. Tenders and contracts;
- F. Conflicts of interest; and
- G. Whistleblowing.

In addition to the issues mentioned on the agenda and listed above, this report also covers the following additional item:

- H. Other issues.

The Ombudsman's findings and suggestions

(A) The Public Service Principles

9. On 19 June 2012, the Ombudsman published the Public Service Principles for the EU Civil Service⁴. The main aim in publishing these principles was to help

³ www.ombudsman.europa.eu/resources/provisions.faces

⁴ <http://www.ombudsman.europa.eu/en/resources/publicserviceprinciples.faces>



build greater trust between citizens and the EU institutions. The principles take account of best practice in the Member States and were established following an extensive period of reflection and public consultation. As the public consultation confirmed, the public service principles are not new, but represent existing expectations of citizens and civil servants. They constitute the fundamental ethical standards that govern the conduct of EU civil servants. The principles are also meant to guide them towards the right decision in situations where they should exercise judgment. As such, they constitute a vital component of the administrative culture of service to which the EU institutions adhere.

10. On 10 July 2012, the Ombudsman informed EIGE of the publication of the Public Service Principles. The Ombudsman was therefore interested in learning whether EIGE has taken or plans to take steps (i) to ensure that all members of its staff are informed of the principles, and (ii) to make the principles available on its website, so that the public is informed that the Agency subscribes to them.

11. In its presentation, EIGE explained that it fully endorses the EU Public Service Principles. The Principles were brought to the attention of EIGE's staff and have recently been made available on EIGE's website.

The Ombudsman's findings concerning (A)

12. The Ombudsman welcomes the fact that EIGE has published the Public Service Principles on its website⁵. The Ombudsman applauds the initiative to inform citizens that EIGE subscribes to these principles.

(B) EIGE's initial contacts with the public

13. One of the Ombudsman's fundamental tasks is to ensure that the EU administration is open, service-minded and efficient in handling contacts with citizens. The relevant basic principles are laid down in the European Code of Good Administrative Behaviour ('the ECGAB'). The European Ombudsman often receives complaints alleging lack of service-mindedness and efficiency. This suggests that the EU administration is still faced with challenges in this area. When appropriate, the European Ombudsman tries to find a rapid solution to complaints that concern grievances arising from citizens' initial contacts with the administration. In such circumstances, the Ombudsman's services usually contact the relevant person by telephone.

14. In her letter of 6 December 2013, the Ombudsman informed EIGE that all the EU agencies had agreed to adopt the ECGAB at a meeting of the Heads of the agencies held in Lisbon in October 2008. However, EIGE's website contained no link to the ECGAB. In this respect, the Ombudsman was interested in knowing whether EIGE could publish the ECGAB on its website. Moreover, the Ombudsman asked how EIGE ensures that its staff members comply with the principles laid down in the ECGAB.

⁵ <http://eige.europa.eu/content/document/public-service-principles-for-the-eu-civil-service>



15. In its presentation, EIGE underlined the importance it attaches to the rules stemming from the new Staff Regulations and outlined its efforts to ensure that its staff members are aware of them. To this end, an electronic version of the new Staff Regulations has been made available to all staff members. In addition, all staff members have been provided with a copy of the new Guide on ethics and conduct issued by the Commission and the ECGAB. Each staff member has signed a letter acknowledging receipt of these documents.

16. The Ombudsman's representatives subsequently clarified that the issue here at stake concerned the ECGAB and not the Staff Regulations, given that the former essentially governs relations with the public, whereas the latter regulates the duties and obligations EU staff members have towards their administration. The Ombudsman was thus interested in knowing, in this context, how EIGE implements the ECGAB. With reference to her letter of 6 December 2013, the Ombudsman also asked whether EIGE intends to make the main parts of its website available in languages other than English and Lithuanian.

17. EIGE replied to the Ombudsman that it is willing to publish the ECGAB on its website. As regards the issue of making the main parts of its website available in languages other than English and Lithuanian, EIGE replied that gender equality vocabulary is difficult to translate. Moreover, there are budgetary constraints. However, EIGE agreed to look into the possibility of publishing on its website a short introduction to its activities in several languages.

The Ombudsman's findings and suggestions concerning (B)

18. The Ombudsman welcomes EIGE's willingness to publish the ECGAB on its website. However, she notes that, to date, the ECGAB is not yet available on its website. The same is true as regards the availability of the main parts of its website in official EU languages other than English and Lithuanian. The Ombudsman has previously said to other Agencies that the minimum requirement is for the homepage and information about what the Agency does to be available in all languages. The Ombudsman thus suggests that EIGE (i) publish the ECGAB on its website, and (ii) make its homepage and information about what EIGE does available in other languages besides English and Lithuanian.

(C) Transparency, dialogue and accountability

19. The Ombudsman attaches great importance to promoting transparency and increasing accountability in the EU administration. The need for transparency is reflected in, among others, the EU legislation on public access to documents, which expressly mentions the Ombudsman as a review body. The need for accountability is reflected in the Ombudsman's extensive powers of investigation, which enable her thoroughly to clarify the facts and issues which arise during her inquiries.

20. In view of the above considerations, the Ombudsman asked EIGE to provide additional information and to answer the following questions:



"a) I note that EIGE's website contains a document entitled "Policy on Public Access to Documents at the European Institute for Gender Equality". The policy makes explicit reference to Regulation (EC) No 1049/2001⁶ on public access to documents and prescribes the arrangements the institute has in place to implement that Regulation. However, I would be grateful to know how EIGE deals in practice with requests for public access to documents. What are its rules, guidelines and/or practical arrangements for handling such requests? Please provide examples, such as the main correspondence in the Agency's handling of the last three requests for public access to documents dealt with under the relevant EIGE rules and/or Regulation 1049/2001. (The substance of EIGE's decisions in these examples will not be examined, as this is not the purpose of this visit.)

b) Does EIGE produce an annual report (internal or external) on its handling of public access to documents?

c) Does EIGE operate, or intend to operate, a public register in the sense of Article 11 of Regulation 1049/2001?

d) EIGE handles a vast amount of information and data. Its website is user-friendly and contains a large volume of data, publications and information relating to EIGE's main activities. Regulation 1049/2001 strictly speaking only applies to 'documents'. How does EIGE deal with requests for information? Please provide us with information concerning the feedback EIGE's services receive from users and stakeholders regarding access to information."

21. In its presentation, EIGE explained that the "Policy on Public Access to documents at the European Institute for Gender Equality" has been in force since June 2013. The policy reflects the idea underlying Regulation 1049/2001, namely, that the general rule is openness and any exceptions to it must be duly motivated. Moreover, the general goal of the policy is to ensure rapid and easy access to documents held by the Agency. The policy and its implementation process were presented to all staff members in October 2013.

22. In reply to the questions relating to access to documents, EIGE explained that it deals with all the requests it receives in accordance with Regulation 1049/2001 and the above-mentioned policy. To this end, it has also appointed a coordinator to ensure the proper implementation of the policy.

23. EIGE intends to launch a public register of documents on its website by the end of June 2014. This register will contain (i) titles of documents; (ii) their registration numbers; (iii) information on their authors; and (iv) the date of their entry into the register. Pursuant to Article 17(1) of the "Policy on Public Access to documents at the European Institute for Gender Equality", a report which will include information on the number of cases in which the Agency refused to grant access to documents, as well as the reasons for such refusals and the number of sensitive documents not recorded in the register will be annexed to EIGE's annual report.

24. After the visit, EIGE provided copies of one access request and two information requests sent to the Agency.

⁶ OJ 2001 L 145, p. 43.



The Ombudsman's findings and suggestions concerning (C)

25. The Ombudsman congratulates EIGE on its website, which is user-friendly, easy to navigate and informative. On its website, EIGE provides the public with a vast amount of information mainly relating to its core activities, as well as sufficient information regarding financial and organisational matters. It has adopted a proactive approach to the dissemination of information, principally through its online publications, and should be applauded in that respect.

26. As regards access to documents, the Ombudsman is pleased to note that EIGE has appointed a coordinator to deal with access requests. She also congratulates EIGE on the specific policy it has in place for the handling of requests for access to documents. The policy contains detailed rules on the internal arrangements in place at the Agency, and these rules appear to be satisfactory. The Ombudsman also notes with satisfaction that EIGE's policy provides for the publication of statistical data concerning access requests dealt with by the Agency. In spite of this provision, the Ombudsman notes that EIGE's annual reports available on its website do not contain any such data. Moreover, the single access request of which the Ombudsman received a copy and which seems to have been handled with some delay, does not enable the Ombudsman to reach any definitive conclusions on the manner in which EIGE deals with requests for access to documents. The Ombudsman thus suggests that EIGE consider producing an annual report on its handling of requests for public access to documents and making it available to the public, in accordance with Article 17(1) of the "Policy on Public Access to documents at the European Institute for Gender Equality". Finally, the Ombudsman applauds EIGE's initiative to make available a public register of documents on its website. She trusts that the register will be functional during the second half of 2014.

(D) Recruitment

27. With regard to the substance of selection and recruitment decisions, the Ombudsman takes an approach similar to that of the Court of Justice of the European Union. This means, among others, that she recognises the administration's wide discretionary powers in selecting its staff. With regard to the procedural aspects of selection and recruitment, the Ombudsman has very actively worked to increase transparency in EU recruitment. Her efforts have, for instance, led to enhanced transparency regarding the names of members of selection boards, and more detailed evaluation sheets providing candidates with a better insight into how they were assessed.

28. In her letter of 6 December 2013, the Ombudsman asked EIGE to provide clarifications on the following issues:

"a) How does EIGE ensure an effective communication with candidates to selection procedures concerning the status of their applications and/or the outcome of the selection procedure?"

b) Are the names of selection board members known to candidates? To what extent does EIGE provide candidates with access to the assessments of their applications?"

c) To what extent does EIGE seek quicker and less formal means to resolve disputes about selection and recruitment decisions than the ones foreseen in Article 90 of the Staff Regulations?"



d) Does EIGE systematically inform candidates in its correspondence that they may complain to the Ombudsman, as provided for in Article 19 of the ECGAB?"

29. In its presentation, EIGE provided information regarding its selection procedures. To date, there have been about 50 recruitment procedures in total. The Agency pointed out that it replies to all queries from candidates. Only candidates invited to attend an interview are informed by letter of the outcome of a selection procedure. Recently, one call for applications was cancelled due to internal developments. In that case, an announcement was published on EIGE's website and all candidates were also informed by letter.

30. In reply to the Ombudsman's question about the disclosure of names of members of selection boards, EIGE referred to its reply of 29 August 2013 to the Ombudsman's own-initiative inquiry OI/4/2013/CK⁷. In that reply, EIGE explained that it does not disclose the names of members of selection boards, given that it considers that such disclosure might lead to unequal treatment between external and internal candidates.

31. EIGE informs candidates of the possibility of lodging a formal complaint in accordance with Article 90(2) of the Staff Regulations. There has been one court case before the Civil Service Tribunal, in which a decision taken by EIGE to reassign a former staff member to a non-management post was annulled. Applicants are not informed of the possibility to contact the Ombudsman in the event of a dispute.

The Ombudsman's findings and suggestions concerning (D)

32. The Ombudsman considers that EIGE's arrangements to ensure effective communication with candidates appear to be generally satisfactory. As regards the issue of disclosing the names of members of selection boards, she notes that the institutions' views on the correct balance between openness and the legitimate needs of confidentiality in the work of selection boards have clearly evolved in the direction of giving greater weight to openness⁸. She points out that the established practice within both the European Personnel Selection Office ('EPSO') and the Commission is to disclose the names of selection board members. In the Ombudsman's view, such a practice guarantees transparency in selection procedures; helps to build and maintain public trust in the EU institutions, bodies, offices and agencies; and reassures candidates that the selection procedure has not been vitiated by conflicts of interest. The Ombudsman has recently issued guidelines in this respect in the framework of her own-initiative inquiry OI/4/2013/CK⁹. She thus suggests that EIGE adopt measures to comply with these guidelines.

33. Concerning the issue of informing candidates about the possibility of complaining to the Ombudsman, the Ombudsman takes the view that it would be in line with good administrative practice if EIGE were to inform candidates

⁷ The reply is available at:

<http://www.ombudsman.europa.eu/en/cases/correspondence.faces/en/53762/html.bookmark>

⁸ Decision of the European Ombudsman on complaint 812/2004/MHZ against the European Personnel Selection Office.

⁹ The guidelines are available at:

<http://www.ombudsman.europa.eu/en/cases/correspondence.faces/en/54361/html.bookmark>



about such a possibility on a systematic basis. She will thus also make a corresponding suggestion below.

(E) Tenders and contracts

34. At the review level, disputes in relation to tender decisions and contractual relationships are most commonly dealt with by the courts. However, over the years, a significant proportion of the Ombudsman's cases has concerned these areas as well. In relation to tenders, the Ombudsman draws inspiration from the Court of Justice's approach, which is to recognise the administration's broad discretionary powers in assessing the substantive aspects of tender proposals, while carefully checking whether it gave valid and adequate reasons for its decisions and whether it adequately respected applicable procedures and information rights. In relation to contractual disputes, the Ombudsman does not, as such, assess whether there is a breach of contract. She does, however, thoroughly examine whether the administration provided good reasons for its position, and also looks into the fairness of administrative actions or omissions.

35. In view of the above, the Ombudsman wished to be informed of how EIGE handles disputes in relation to these areas.

36. EIGE presented the main elements of the procedure it follows when it issues a call for tenders. It informed the Ombudsman that its primary aim is to prevent disputes by strictly following the applicable rules and by ensuring the equal treatment of all tenderers and contractors. EIGE answers all questions and publishes a question and answer section on its website. The call for tenders specifies where the question and answer section may be found.

37. EIGE sends notification letters to tenderers, stating reasons for the award or non-award of a tender. The notification letters, which follow the templates of the European Commission's Directorate-General for Budget, contain information on available judicial remedies and a reference to the Ombudsman.

38. In the area of contracts, EIGE explained that it seeks to settle disputes primarily by means of negotiation in the context of project and contract management. If the dispute cannot be settled amicably, judicial review is also possible before the courts of the Republic of Lithuania.

39. To date, there has been one procurement case against EIGE before the General Court, which EIGE lost (Case T-412/12).

40. On the question of whether tenderers and contractors are informed that they may complain to the Ombudsman, EIGE stated that it informs tenderers and contractors of their right to submit a complaint to the Ombudsman in the contract notice and the contract award notice published in the Official Journal of the EU. Notification letters to unsuccessful tenderers in procurement procedures also contain a reference to the Ombudsman.

The Ombudsman's findings concerning (E)

41. The Ombudsman welcomes the fact that EIGE informs tenderers and contractors of their right to submit a complaint to the Ombudsman in the contract notice, contract award notice and notification letters. Furthermore, she considers that the procedures which EIGE has in place in the area of tenders and contracts seem to be generally satisfactory.



(F) Conflicts of interest

42. Conflicts of interest arise when persons who work for the public administration may be perceived as having an inappropriate personal interest in a matter with which they are dealing. Such conflicts need to be handled appropriately in order to ensure objective decision-making, and to enhance the public's trust in the administration. Recent events and cases show that the EU administration does not enjoy the public's full confidence in relation to this issue.

43. In her letter of 6 December 2013, the Ombudsman asked EIGE to provide information on the concrete measures it takes in order to avoid conflicts of interest in relation to:

(a) the recruitment of staff, including senior staff; and

(b) the conduct of current and former staff members, notably regarding external activities during and after their service at EIGE (see, for instance, Articles 11, 11a, 12b, and 16 of the Staff Regulations).

44. In its presentation, EIGE explained that, in December 2012, the Commission published a "Roadmap on the follow-up to the Common Approach on EU decentralised agencies". With a view to implementing the roadmap, EIGE began to draw up a policy on conflicts of interest.

45. At the time of the Ombudsman's visit, EIGE's policy on conflicts of interest was at the stage of inter-service consultation with the Commission's services with a view to preparing its adoption by EIGE's Management Board. On 16 December 2013, EIGE forwarded to the Ombudsman's services a copy of its draft conflict of interest policy. Since then, the policy has been adopted and it is now available on EIGE's website¹⁰.

46. According to Article 1 of the policy, it applies to the following categories of EIGE's staff members and stakeholders:

- The Director;
- Members of EIGE's Management Board and Experts' Forum;
- Members of EIGE's working groups;
- Experts invited to contribute to the activities of EIGE's Thematic Networks;
- Persons seeking employment with the institute, once a job offer is made to them; and
- Seconded national experts, staff recruited on an interim basis, as well as trainees.

46. Due to the nature of the work carried out in the Thematic Networks referred to in the fourth bullet-point above, that category of stakeholders is not requested to sign a full declaration of interest, but a commitment of independence pursuant to Article 13 of the policy. However, if a conflict of interest occurs during a meeting of a particular Thematic Network, the persons concerned are requested to abstain from participating in the discussions

¹⁰ <http://eige.europa.eu/content/document/policy-on-management-of-conflict-of-interests-in-eige>



concerning specific items. EIGE explained that all categories of persons referred to above are duly informed about EIGE's conflict of interest policy before taking up a position within EIGE's structures.

47. EIGE then explained that its conflict of interest policy is based on the principles of independence, transparency and confidentiality.

The Ombudsman's findings concerning (F)

48. The Ombudsman has stated on several occasions that EU institutions, bodies, offices and agencies should do their utmost to avoid not only actual but also apparent conflicts of interest, in order to maintain public trust and confidence in their activities and to protect their staff from unjustified suspicion. In this regard, she welcomes the fact that EIGE has adopted a conflict of interest policy and has developed templates for declarations of interest. She also applauds the fact that the Agency has made available on its website its Director's declaration of interests¹¹.

49. As regards the substance of EIGE's conflict of interest policy, the Ombudsman notes with satisfaction that it contains detailed provisions on the interests to be declared, the procedures to be followed in that context and how the policy applies to different groups of EIGE's personnel and stakeholders. The annexes to the policy also contain templates to be used for statements and declarations on conflicts of interest and commitments of independence. She thus concludes that EIGE's policy seems to be satisfactory.

(G) Whistleblowing

50. The Ombudsman asked EIGE to provide information about any arrangements it has in place for internal whistleblowing and about any whistleblowing cases.

51. In its presentation, EIGE noted that, since 2010, it has had no whistleblowing cases. The relevant principles included in the Staff Regulations have been internally implemented by Decision MB/2011/022 of EIGE's Management Board. The rules were explained to the Agency's staff members in 2011 during a training session on ethics and integrity led by a team of representatives of the European Anti-Fraud Office (OLAF).

The Ombudsman's findings and suggestions concerning (G)

52. The Ombudsman welcomes the fact that EIGE has taken a proactive approach to whistleblowing by adopting internal rules (Decision MB/2011/022) in that respect. That Decision contains rules with respect to reporting improprieties. The Ombudsman takes the view that the Decision contains important examples of initiatives taken in order to address the challenges of whistleblowing, even though it does not appear to go significantly beyond what is already provided for in the relevant Articles of the Staff Regulations. Furthermore, amendments to the Staff Regulations that came into force on 1 January 2014 include a new Article 22c, which requires further internal

¹¹ <http://eige.europa.eu/sites/default/files/VL-Declaration.pdf>



rulemaking on whistleblowing. The Ombudsman thus takes the view that it would be useful to include in the Decision more detailed provisions intended to facilitate the administrative investigations of OLAF within the Agency and suggests that EIGE consider doing so.

(H) Other issues

53. The Ombudsman has become aware of a number of concerns about EIGE's handling of allegations of psychological and sexual harassment. The Ombudsman has thus decided to extend the scope of the present inquiry so as to include the issue of EIGE's handling of complaints about psychological and sexual harassment as well. Her questions to EIGE in this respect are listed below, after her suggestions to EIGE concerning the issues discussed during the visit.

Summary of the Ombudsman's suggestions

54. On the basis of her visit and the information which EIGE provided to her, the Ombudsman makes the following suggestions:

a) EIGE could consider publishing the European Code of Good Administrative Behaviour (ECGAB) on its website, so as to make its commitment to the principles laid down in the ECGAB more prominent and visible to the public.

b) EIGE could consider making its homepage and information about what it does available in other official EU languages besides English and Lithuanian.

c) EIGE could consider producing an annual report on its handling of requests for public access to documents and making it available to the public, in accordance with Article 17(1) of the "Policy on Public Access to documents at the European Institute for Gender Equality".

d) In its recruitment procedures, EIGE could consider informing candidates about the possibility of complaining to the Ombudsman on a systematic basis. Such a practice would be in line with the principles of good administration.

e) EIGE could consider adopting measures with a view to complying with the Ombudsman's guidelines on the disclosure of names of members of selection boards.

f) EIGE's whistleblowing rules contain provisions with respect to reporting improprieties. EIGE could consider including more detailed provisions intended to facilitate the administrative investigations of OLAF within the Agency and amending Decision MB/2011/022 accordingly.

55. Furthermore, the Ombudsman invites EIGE to reply to the following questions:

(1) How does EIGE deal with allegations of psychological and sexual harassment internally? Please provide a copy of the relevant rules, if any, which EIGE has adopted as well as information on any other practical written or unwritten arrangements EIGE has in place in order to protect staff members from such harassment.



(2) How many requests for assistance pursuant to Article 24 of the Staff Regulations relating to issues of harassment did EIGE receive in 2012 and 2013? Without entering into the details of specific requests received, what was the outcome of these requests?

(3) How many complaints pursuant to Article 90(2) of the Staff Regulations relating to issues of harassment did EIGE receive in 2012 and 2013? Without entering into the details of specific complaints received, what was the outcome of these complaints?

(4) How are EIGE's confidential counsellors involved in the Agency's attempts to protect staff members from harassment? How are they being trained? What is the frequency of such training sessions, if any?

A handwritten signature in black ink, appearing to read 'Emily O'Reilly'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Emily O'Reilly

Done in Strasbourg on 24/06/2014