



Emily O'Reilly

European Ombudsman

Ms Catherine De Bolle  
Executive Director  
EUROPOL

CAB@europol.europa.eu  
sebastien.moras@europol.europa.eu  
gregor.wewer@europol.europa.eu

Strasbourg, 20/12/2023

Complaint 2091/2023/AML

**Subject:** How the EU Agency for Law Enforcement Cooperation (Europol) dealt with the moves of two former staff members to positions related to combatting online child sexual abuse

Dear Ms De Bolle,

I have received a complaint against Europol.

The complaint is about the way Europol handled the post-service activity requests of two of its former staff members who allegedly had worked on matters related to preventing and combatting child sexual abuse on the internet while at Europol and whose new positions seem to relate to this matter. The first staff member joined a major technology stakeholder in early 2022, and the second joined the same stakeholder as a board member later that year.<sup>1</sup> The complainant considers that these moves give rise to risks of conflicts of interest.

I have decided to open an inquiry into this complaint to investigate how Europol dealt with the moves of these two former staff members.

I have decided that, for the purpose of this inquiry, it is necessary to inspect the documents in Europol's file on:

- The authorisation requests and supporting documents submitted by the two former staff members when declaring their post-service activities;
- The decisions issued by Europol in both cases, as well as all related internal documents or exchanges, in particular those that detail the reasoning for granting or not granting the authorisation;

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<sup>1</sup> The exact details of the cases at stake can be found in the complaint, which you will find attached to this letter. Please note that the full text of the complaint is located in the first attachment to the complaint form.



- Any guidance that Europol gives to its staff leaving the service regarding paid or unpaid activities.

I would be grateful if Europol could provide the above documents, preferably in electronic format,<sup>2</sup> by 15 January 2024. The responsible inquiries officer is Ms Amandine Le Bellec, who can be reached at +32 2 283 15 50 or [amandine.lebellec@ombudsman.europa.eu](mailto:amandine.lebellec@ombudsman.europa.eu).

Yours sincerely,

Emily O'Reilly  
European Ombudsman

**Enclosure:** complaint in 2091/2023/AML.

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<sup>2</sup> Information or documents that your institution considers to be confidential will not be disclosed to the complainant or any other person without the prior agreement of Europol. Please clearly mark such material 'Confidential'. Encrypted emails can be sent to our dedicated mailbox [eo-secem@ombudsman.europa.eu](mailto:eo-secem@ombudsman.europa.eu). Please contact [eo-secem@ombudsman.europa.eu](mailto:eo-secem@ombudsman.europa.eu) beforehand. Information and documents of this kind will be deleted from the European Ombudsman's files shortly after the inquiry has ended.