



# Recommendations on Information Exchange between Dublin Units

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# About the recommendations

**Why were these recommendations created?** The mission of the European Asylum Support Office (EASO) is to support European Union Member States and associated countries (Member States) through common training, common quality standards and common country of origin information, among others. According to its overall aim of supporting Member States in achieving common standards and high-quality processes within the Common European Asylum System, EASO develops common practical tools, guidance and recommendations based on the needs and requests of the Member States.

Information requests can pose different challenges to Member States receiving and sending requests. The EASO Network of Dublin Units set the topic of information exchange as a priority topic for 2021 and decided on the development of a set of recommendations on this area to facilitate workflows for everyone involved in these processes.

**What is the objective of this document?** This document was developed to promote best practices for exchanging information between Dublin Units in an efficient and effective way. Its objective is to provide a recommended course of action for dealing with information requests to improve the quality and ensure full and active information exchanges. These recommendations should bring clarification to the use of information requests, provide support and understanding of Article 34 requests, and ease the cooperation by providing common ground for the Member States as a starting point for the further harmonisation of the Dublin practice.

**What is in the scope of these recommendations?** The recommendations provide a general overview of information exchange between Dublin Units, and they encompass the procedure for preparing, sending, receiving, and replying to information requests. Some inspiration for the effective organisation of the procedure is also provided.

**Who should use these recommendations?** This document is primarily intended for case officers dealing with information requests, such as Dublin officers and asylum or reception officers, or others involved in the procedure. The last chapter is directed at policymakers, asylum managers or head of Dublin Units for inspiration to develop practical policies, improve workflows or to improve the quality of the procedure in their respective countries.

**How were these recommendations developed?** These recommendations were developed by a working group of experts in the field of information requests from Denmark, Italy, Greece, Norway, the Netherlands, Sweden and Switzerland, based on the outcome of the thematic expert meeting on cooperation on information exchange between Dublin Units organised online on 28 and 29 April 2021. The development was facilitated and coordinated by EASO. Before its finalisation, a consultation on the guide was carried out with all Member States through the EASO Network of Dublin Units and with further input from the European Commission and eu-LISA.

**How to read these recommendations?** This document starts with a general introduction of the procedure of information exchange between Dublin Units along with a description of the different sources of information or databases that can be used to collect more information regarding a person. A standard workflow is provided to give an overview of the procedure for sending and replying to a request. This is then followed by detailed recommendations on how to prepare and send an information request,

recommendations for sending a reply to information requests, and lastly, considerations for organising the Article 34 procedure in the Member States.

The document includes boxes containing good practices, practical examples, or additional remarks. Good practices are used to promote a certain way a Member State works, these are highlighted in green. Practical examples, highlighted in yellow, are used to further illustrate certain topics. Additional remarks, highlighted in green with a left border are used to explain terminology or to provide more background for certain recommendations. The blue boxes refer to existing EASO products or other suggestions for further reading.

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# List of abbreviations

<b>Article 34 procedure</b>	The procedure to exchange information between Dublin Units in accordance with Article 34 Dublin III regulation
<b>CEAS</b>	Common European Asylum System
<b>DubliNet</b>	Secure electronic network of transmission channels between the national authorities dealing with asylum applications
<b>Dublin III regulation</b>	Regulation (EU) No 604/2013 of the European Parliament and of the Council of 26 June 2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person (recast)
<b>Dublin Unit</b>	The Member State authority in charge of conducting the Dublin procedure, in accordance with Article 35 Dublin III regulation
<b>EASO</b>	European Asylum Support Office
<b>Eurodac</b>	European Asylum Dactyloscopy Database, established by the Eurodac regulation see 'Eurodac II regulation'
<b>Eurodac II regulation</b>	Regulation (EU) No 603/2013 of the European Parliament and of the Council of 26 June 2013 on the establishment of 'Eurodac' for the comparison of fingerprints for the effective application of Regulation (EU) No 604/2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person and on requests for the comparison with Eurodac data by Member States' law enforcement authorities and Europol for law enforcement purposes, and amending Regulation (EU) No 1077/2011 establishing a European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (recast)
<b>Implementing regulation</b>	Commission Regulation (EC) No 1560/2003 of 2 September 2003 laying down detailed rules for the application of Council Regulation (EC) No 343/2003 establishing criteria and mechanisms for determining the Member State responsible for examining an asylum application lodged in one of the Member States by a third-country national, as amended by Commission Implementing Regulation (EU) 118/2014 of 30 January 2014
<b>Member States</b>	Member States of the European Union and the associated countries (Iceland, Liechtenstein, Norway, and Switzerland)
<b>SIS</b>	Schengen Information System
<b>SOP</b>	standard operating procedures
<b>VIS</b>	Visa Information System
<b>UAM(s)</b>	unaccompanied minors

# 1. Introduction

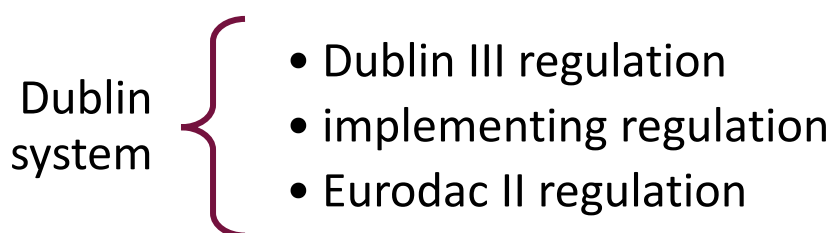
## The Common European Asylum System

The Common European Asylum System (CEAS) establishes common procedures in the Member States for granting and withdrawing international protection, to ensure uniform status of beneficiaries in the Member States as well as fair and humane treatment of applicants for international protection across the Member States. The CEAS ensures these by the minimum harmonisation of asylum procedures and reception conditions, reducing differences between the procedures through binding regulations and directives, achieving a higher level of approximation of the rules on the recognition and content of international protection, and by strengthening practical cooperation between the Member States. The Dublin III regulation<sup>1</sup> is the cornerstone of the CEAS, aimed at determining the Member State responsible for examining an application for international protection.

## The Dublin III regulation

Member States of the European Union and the associated countries (Member States) are bound by the Dublin III regulation.

The Dublin III regulation, together with the Dublin implementing regulation<sup>2</sup> and the Eurodac II regulation provide the three key legal instruments of the Dublin system.



The Dublin III regulation lays down the procedure and criteria for determining the Member State responsible for examining an application for international protection.

The implementing regulation sets out the rules for how the regulation should be implemented, by specifying the standard forms to be used during the procedure.

The Eurodac II regulation facilitates the implementation of the Dublin III regulation by governing the Eurodac database. Eurodac contains fingerprints of third-country nationals and stateless persons and contributes to determining whether an individual has already applied for asylum in a Member State, has irregularly crossed the external border of the territory of a Member State or has been found staying illegally in Member State.

<sup>1</sup> [Regulation \(EU\) No 604/2013](#) of the European Parliament and of the Council of 26 June 2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person.

<sup>2</sup> The consolidated text of the original regulation and its amendments is available here: [Commission Regulation \(EC\) No 1560/2003](#) of 2 September 2003 laying down detailed rules for the application of Council Regulation (EC) No 343/2003 establishing the criteria and mechanisms for determining the Member State responsible for examining an asylum application lodged in one of the Member States by a third-country national, (OJ L 222, 5.9.2003) amended by Regulation (EU) No 604/2013 of the European Parliament and of the Council of 26 June 2013, (L 180 31, 29.6.2013) and Commission Implementing Regulation (EU) No 118/2014 of 30 January 2014, (L 39 1, 8.2.2014).



## The Dublin procedure

The procedure of determining the Member State responsible for examining an application for international protection is called the Dublin procedure. The Dublin procedure starts as soon as an application for international protection is lodged with a Member State. It guarantees that the application lodged by the applicant will be examined by one Member State.

The criteria for the determination of responsibility run in hierarchical order, starting with family links of an applicant in a Member State, possession of a visa or residence permit issued by a Member State, irregular entry, illegal stay in a Member State or visa waived entry. If none of these criteria apply, the first Member State in which the application was lodged is responsible for the examination of the application for international protection.

Based on the criteria of the Dublin III regulation, Member States assess the responsibility, and may request another Member State to take charge of an application of a person, for example, in cases of family ties, visa, or irregular entry through another Member State. Member States send a take back request to another country if the applicant has already lodged an application for international protection in another Member State. For the determination of responsibility or for the examination of the application, Member States also exchange information when the evidence on responsibility is insufficient or further information is needed to properly examine the application. Information requests between the Dublin Units are the subject of this set of recommendations.

The Dublin procedure is a complex process; therefore, its implementation is facilitated by other acts and tools. One of these is the implementing regulation which details the rules to implement the Dublin III regulation. Another one is Eurodac, a database used by all Member States to record and/or search fingerprints of applicants for international protection (record and search), persons apprehended in connection with the irregular crossing of the external borders of the EU (record) and persons found illegally staying in the EU (search). The main objective is to ascertain if a person applied for international protection in another Member State or entered the EU through another country irregularly.

It is specified in the implementing regulation that any requests and replies should only be exchanged between the competent authorities, the Dublin Units and by using a secure electronic transmission channel, called DubliNet. The conditions for using DubliNet are explained in the implementing regulation. For example, each type of requests should be sent by using a specific code in the subject line of the email.

### Further reading about the Dublin procedure

To learn about the Dublin procedure and the different criteria of the Dublin III regulation, you are invited to read the [\*\*\*EASO Practical Guide on the Implementation of the Dublin III Regulation: Personal interview and evidence assessment\*\*\*](#). This practical guide is targets case officers at Dublin Units, asylum units or reception officers or any person that might come across a Dublin case during their work. It gives a general overview of the procedure, the different criteria and how to identify a potential Dublin case by giving a list of the potential evidence to assess, as well as how to conduct a personal interview on Dublin.

In the [\*\*\*EASO Guidance on the Dublin Procedure: Operational standards and indicators\*\*\*](#) the general standards for exchanging information are specified with indicators related to how the different standards can be met. These commonly agreed baselines concern the operational setup of Dublin Units.

The [\*\*\*Recommendations on the Operational and Technical use of DubliNet\*\*\*](#) gives a general overview on the way DubliNet works and provides a set of recommendations on how to work with DubliNet on a daily basis and how to reduce incident resolution time.

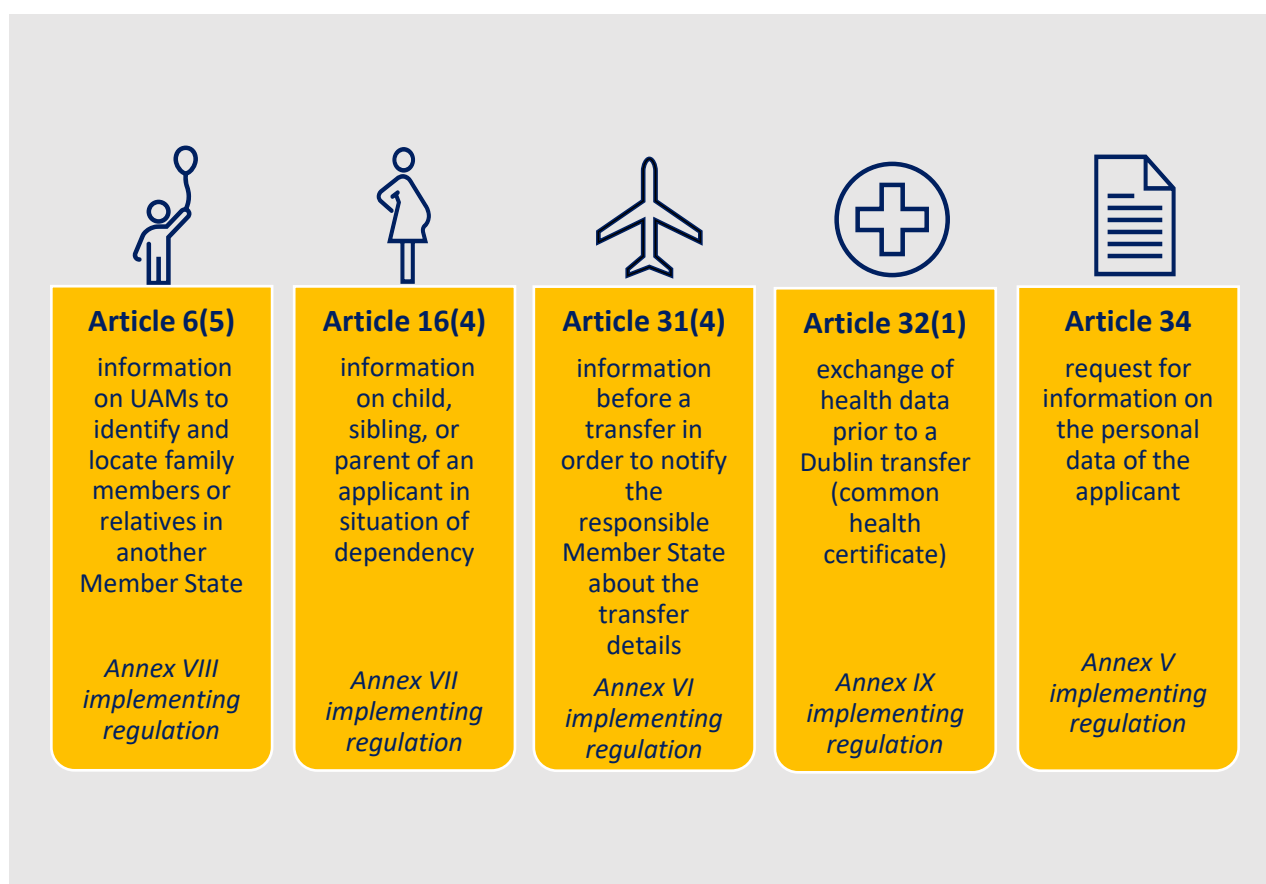
## Information exchange under the Dublin III regulation

The Dublin III regulation allows the Member State authorities to exchange certain information related to the applicant for several purposes. Such information exchange can be important for the outcome of the Dublin procedure and can also be relevant for the examination of an application for international protection.

This set of recommendations will focus on information requests in accordance with Article 34, which concerns the personal data of the applicant, determination of the responsible Member State, examination of an application for international protection, or implementation of any obligation arising under the Dublin III regulation. It is important to keep in mind that only information specified in the regulation can be shared, and only for the purpose set out in the regulation.

Information exchange under the Dublin III regulation can furthermore be related to the determination of responsibility by, for example, tracing, identifying and locating family members or relatives of the unaccompanied minor (in accordance with Article 6(5) Dublin III regulation), or persons with dependency (in accordance with Article 16(4) Dublin III regulation). The information exchange can also be related to the transfer of the applicant by sharing data on the details of the travel (in accordance with Article 31(4) Dublin III regulation) or on the applicant's health (in accordance with Article 32(1), also called as the 'common health certificate'). For all these types of information exchange, different forms are used, annexed to the implementing regulation.

An overview of the different types of information exchange under the Dublin III regulation, their content and the use of relevant annexes is provided below.



**Further reading**

Recommendations related to the exchange of information before a transfer (Article 31(4)) and on exchange of health data prior to a Dublin transfer (Article 32(1)) can be found in the ***Recommendations of the EASO Network of Dublin Units on Dublin transfers***.

**Information exchange in accordance with Article 34**

Chapter VII of the Dublin III regulation lays down rules for the administrative cooperation between Member States. As part of this administrative cooperation, Dublin Units of the Member States<sup>3</sup> can request another Member State authority to share personal data of the applicant. The applicable rules and conditions for this type of information sharing are set out in Article 34 Dublin III regulation.

As competent authorities for carrying out the Dublin procedure, the information exchange according to Article 34 is, in most cases, performed by the Dublin Units of the Member State authorities<sup>4</sup>. The Dublin Units exchange information through DubliNet, using the standard form for information exchange as specified in Annex V of the implementing regulation.

**Further reading on the use of DubliNet**

Recommendations related to the use of DubliNet with regards to exchanging information can be found in the ***Recommendations on the operational and technical use of DubliNet*** which promotes best practices for the operational use of DubliNet in the Member States and bring clarification for the use of and dealing with DubliNet daily, easing cooperation by providing common ground for the Member States as a starting point for the further harmonisation of the Dublin practice.

**Article 34: legal framework**

Article 34 Dublin III regulation specifies the purpose of information sharing and the type of information that can be shared. It also specifies the conditions and the way information sharing related to an applicant for international protection should take place between the Member States, which authorities can exchange the information, and for what purpose. An overview is provided below regarding the different rules set out in the Article.

**Article 34(1)**

**The possible objective of a request for information can be**

- determination of the responsible Member State
- examining the application for international protection
- implementing any obligation deriving from the Dublin III regulation

<sup>3</sup> In accordance with Article 35(1), each Member State must notify the Commission of the specific authorities which are responsible for fulfilling the obligations arising under the Dublin III regulation. These competent authorities are referred to as Dublin Units in this document.

<sup>4</sup> Depending on the organisation of the national procedure in some Member States, for example, where the procedure is decentralised, it is possible that asylum case officers or reception officers will send information requests to other Member States.

### Article 34(2)

**The following information can be shared**

- personal details, information on family members
- identity and travel papers
- other information on the identity of the person
- places of residence, travel route
- residence documents or visas issued by a Member State
- information on the date or place of lodging the application, stage of the asylum procedure reached or any decision taken

### Article 34(3)

**Requesting and sharing specific information**

- the responsible Member State asking the grounds of the application lodged in the other Member State
- the responsible Member State asking the grounds of the decision taken

### Article 34(4)

**Procedural rules for requesting information**

- the request concerns an individual application
- the request should specify:
  - its grounds
  - the evidence that might entail the responsibility of the requested Member State
  - other relevant information (way of entry, specific and verifiable part of the applicant's statements)

### Article 34(5)

**Timeline to reply and other obligations**

- requested Member State should reply in 5 weeks
- in case of delay, the time limit for submitting a take charge or take back is extended by the period of time of the delay

### Article 34(6)

**The way the information can be shared only**

- upon request
- between the competent authorities (Dublin Units) (in accordance with Article 35(1) Dublin III regulation)

### Article 34(7)

**The purpose of sharing information in accordance with Article 34**

- the information can only be used as specified in Article 34(1) Dublin III regulation
- the information can be communicated to the authorities and courts and tribunals of the Member State in charge of:
  - determination of the responsible Member State
  - examining an application for international protection
  - implementing any obligation deriving from the Dublin III Regulation

### **Article 34(8)**

#### **The requirements of the information that is shared**

- information should be accurate and up-to-date
- if inaccurate or if it should not have been shared, the requesting Member State should be informed and the information should be corrected or erased

### **Article 34(9)**

#### **The rights of the applicant**

- the applicant has the right to be informed about any data that is processed concerning them
- be entitled to have any data incorrectly processed corrected or erased
- to bring an action or complaint before the authorities or courts or tribunals of the Member State which refused their right access or right of correction or erasure of data relating to them

### **Article 34(10)**

#### **The obligation to keep a record of the transmission of data**

- the Member States exchanging the information should keep a record of the transmission and the receipt of the information in the applicant's individual file

### **Article 34(11)**

#### **Storing the information**

- the information should be kept only as long as it is necessary for the purpose it was requested for

### **Article 34(12)**

#### **Ensuring compliance with the rules**

- in cases where the data is not processed automatically, or the information is not included in the file, effective checks should be performed to ensure compliance with the provisions of Article 34 Dublin III regulation

## Alternative sources of information

Member States have access to different central databases that can be used to collect information related to a person. These sources can be used in addition to or as alternatives to information requests. An overview is provided below about three main central databases, describing their purpose and the data that is stored.

### *Eurodac*

The central Eurodac system was established to support the implementation of the Dublin II regulation<sup>5</sup>, the predecessor to the Dublin III regulation, and it is one of the most important sources of information in the determination of the responsible Member State. It provides swift and prompt access to information related to a previous application for international protection or irregular entry.



Eurodac stores information that is relevant for determining the responsible Member State for examining the applicant's asylum claim. Member States have the obligation to update information in Eurodac to facilitate the Dublin procedure.

### What information is stored in Eurodac?

#### **Data related to the person concerned (Article 11 Eurodac II regulation)**

Fingerprint data (for persons of at least 14 years old), sex, date of taking the fingerprints

#### **Information related to the Member State recording the information (Article 11 Eurodac II regulation)**

Member State recording the fingerprint, place, and date of application for international protection, or place and date of apprehension, reference number of the Member State, date of transmission of data to Eurodac, user ID of the operator.

#### **Information related to fingerprinting: transfer to the responsible Member State (Article 10(a) Eurodac II regulation)**

Following a transfer to the responsible Member State based on a take back request the responsible Member State updates the data set related to the person by recording the date of arrival to the Member State responsible.

#### **Information related to fingerprinting: transfer to the responsible Member State (Article 10(b) Eurodac II regulation)**

Following a transfer to the responsible Member State based on a take charge request, the responsible Member State sends the data set relating to the person concerned and includes their date of arrival.

#### **Information related to fingerprinting: leaving the territory of the Member States (Article 10(c) Eurodac II regulation)**

If the Member State that recorded the person's data in Eurodac establishes that the person had left the territory of the Member States, it updates the data set in Eurodac, adding the date when the person had left the territory of the Member States.

#### **Information related to fingerprinting: return or removal from the territory of the Member States (Article 10(d) Eurodac II regulation)**

Once established that the person left the territory of the Member States because of a return decision or removal order following the withdrawal or rejection of the application for international protection, the Member State that recorded the person's data updates the data set in Eurodac by adding the date of removal or the date of leaving the territory.

<sup>5</sup> [Council Regulation \(EC\) No 343/2003](#) of 18 February 2003 establishing the criteria and mechanisms for determining the Member State responsible for examining an asylum application lodged in one of the Member States by a third-country national, (OJ L 050, 25.2.2003).

### Information related to fingerprinting: application of Article 17(1) Dublin III regulation (Article 10(e) Eurodac II regulation)

If the Member State that recorded the data becomes responsible in accordance with Article 17(1) Dublin III regulation, it updates the data set in Eurodac by adding the date when the decision to examine the application was taken.

### Marking the data (Article 18 Eurodac II regulation)

If the person concerned is granted international protection, the Member State granting protection to the person marks the data that was recorded, and the central system notifies all other Member States that recorded data related to the person to also mark the corresponding data sets.

### How to use Eurodac as alternative to information request?

If the information in Eurodac is regularly updated, there is no need to request information on the topics mentioned above, as these would already be available for the Member State conducting the search in Eurodac.

### Visa Information System

The Visa Information System (VIS) performs biometric matching for identification and verification of a person. VIS is a database that connects visa authorities and consulates of the Schengen states in third countries and all external border-crossing points of Schengen states.



VIS allows the Member States to exchange data on applications for short-stay visas, decisions on granting, refusing, annulling, revoking, or extending visas. Among other purposes, it facilitates the visa application procedure, and it is also used to prevent bypassing the Dublin criteria.

### How can information in VIS be accessed?

VIS can be used for the determination of the responsible Member State, and for examining an application for international protection. VIS has dedicated operations for these purposes, under variants “AsylumExamination” and “AsylumResponsibility”. Access to VIS for asylum authorities is limited to specific data categories regarding the applicant / their family members depending on the purpose of the operation. (Article 21-22 VIS regulation<sup>6</sup>). Asylum authorities can have access to VIS to search with the fingerprints of the applicant, or failing that, with data of the person.

### Information available through VIS

If a search conducted for the purpose of determining the responsible Member State, and a VIS record is identified (‘a visa issued with an expiry date of no more than six months before the date of the asylum application, and/or a visa extended to an expiry date of no more than six months before the date of the asylum application’), the asylum authority is given access to consult a limited number of data of the file.

These data include application number, the authority that issued or extended the visa, if the authority issued it on behalf of another Member State; data taken from the application form referred to in Article 9(4)(a) and Article 9(b) VIS regulation; the type of visa; period of validity; duration of the intended stay; photographs; the data referred to in Articles 9(4)(a) and (b) of the linked application file(s) on the spouse and children information on visas issued (Article 10), annulled (Article 13) and extended (Article 14) is granted to asylum authorities.

### How can the Visa Information System be used as an alternative to an information request?

VIS can be an important source of information for the determination of the responsible Member State. If a search in VIS indicated that the person was issued a visa, the authority conducting the search can access

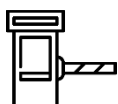
<sup>6</sup> [Regulation \(EC\) No 767/2008](#) of the European Parliament and of the Council of 9 July 2008 concerning the Visa Information System (VIS) and the exchange of data between Member States on short-stay visas (VIS regulation).



whether the visa was issued on behalf of another Member State (marked with letter 'R'). Data related to the person concerned and linked persons (persons travelling together, including spouse and children), the visa application and the information related to the issued visa are also available from the system.

### *Schengen Information System*

The Schengen Information System (SIS)<sup>7</sup> is the largest information sharing system for security and border management in Europe. It was established as a compensatory measure for managing security risks arising from the abolition of internal border controls and to manage efficient controls at external borders through data sharing. A comprehensive overview of SIS is accessible in the [factsheet of the European Commission](#).



SIS stores information that is relevant for the cooperation in border control, law enforcement, judicial cooperation, and vehicle registration. SIS is accessed by the competent authorities to consult or to insert new alerts related to persons or objects in the system.

### **How can information in SIS be accessed?**

Access to SIS is restricted to officials with an operational need to process it. Member States can only process SIS data for purposes specified for each category of alert.

### **Information and categories of alerts in SIS**

SIS stores data that can identify the person or the object in question, and the instructions for authorities if the person or object is found. SIS contains alerts on persons or objects, such as alerts related to refusal of entry or stay, persons wanted for arrest, missing persons, persons sought to assist with a judicial procedure, etc.

### **How can SIS be used as an alternative to an information request?**

SIS can help to learn if a person is a subject to refusal of entry alert because of migratory risk, threat to public policy or national/public security, is wanted by a Member State for a criminal offence or is missing.

From 2022, it will be possible to verify if a person is subject to return alert that was issued based on the return decision<sup>8</sup>, or to verify if a person is vulnerable<sup>9</sup>, for example a person is a child who needs to be prevented from travelling because of being at risk of abduction, or if a person is at risk of becoming victim of human trafficking.

<sup>7</sup> [Regulation \(EC\) No 1987/2006](#) of the European Parliament and of the Council of 20 December 2006 on the establishment, operation and use of the second generation Schengen Information System (SIS II); [Council Decision 2007/533/JHA of 12 June 2007](#) on the establishment, operation and use of the second generation Schengen Information System (SIS II). With the entry into application of the Regulation (Regulations (EU) 2018/1860, Regulation (EU) 2018/1861 and Regulation (EU) 2018/1862, SIS will have new functionalities that will become fully operational in 2022. These new functionalities are related to information exchange (as the system will allow new categories of alerts and more data), and will also introduce novelties related to biometrics, counterterrorism, vulnerable persons, irregular migration, and enhanced access for EU agencies.

<sup>8</sup> [Regulation \(EU\) 2018/1860](#) of the European Parliament and of the Council of 28 November 2018 on the use of the Schengen Information System for the return of illegally staying third-country nationals, which will become applicable in 2022.

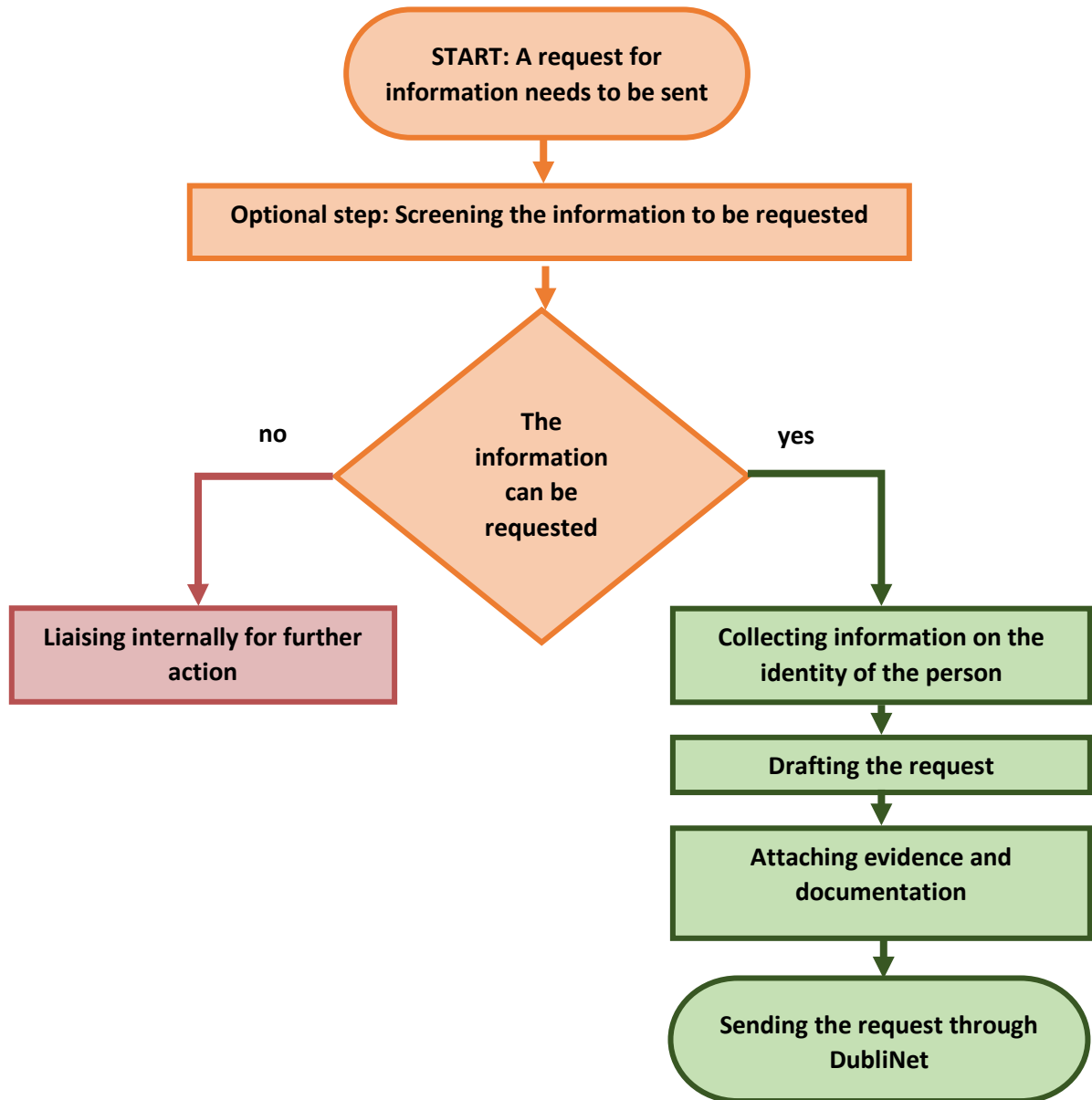
<sup>9</sup> [Regulation \(EU\) 2018/1862](#) of the European Parliament and of the Council of 28 November 2018 on the establishment, operation and use of the Schengen Information System (SIS) in the field of police cooperation and judicial cooperation in criminal matters, amending and repealing Council Decision 2007/533/JHA, and repealing Regulation (EC) No 1986/2006 of the European Parliament and of the Council and Commission Decision 2010/261/EU, which will become applicable in 2022.



## 2. Preparing and sending an information request

### Standard workflow 1: Preparing and sending an information request

The below workflow was developed based on expert level discussions on an ideal workflow for an efficient and effective procedure for sending information requests by Dublin Units<sup>10</sup>.



<sup>10</sup> It is important to note that for the sake of clarity, no prejudice has been made regarding whether the request is sent by the Dublin Unit to determine responsibility or if the request involves other stakeholders needing information when examining the application for international protection. The workflow is intended to cover the best practice regardless of the purpose for sending a request. The elements of the workflow are clickable.

When the need for information arises within the national authority, and another Member State is to be requested to share the information, some general steps are necessary before sending the request. This chapter outlines the recommended steps for case officers in the requesting Member State to prepare and send an information request to another Member State.

## 1. Screening the information to be requested

Improving the quality of information requests that are to be sent to another Member State can be a way to address the several challenges pertaining to information requests and can contribute to increasing the chances of a swift and comprehensive reply. It is therefore recommended to screen outgoing information requests before sending these to the Dublin Unit of the other Member State. Screening can serve the purpose to ensure that the information can be requested from the other Member State.

Screening may include the following steps.

### *Identify what the request relates to*

- It is important to understand the objective of the information request before sending it.
- When identifying what the request relates to, it is also important to be aware of any applicable deadlines in the national procedure to ensure that the most urgent requests are prioritised.

#### **Additional remark on understanding the objective**

Having a clear objective in mind can help the case officer throughout the preparation and sending of the request. Understanding the objective of the request can also ensure that the relevant information is collected and provided to the Member State with the request.

### *Check if the request is necessary to be sent*

- It is recommended to be aware of alternative sources of information as it is useful to assess if there are other sources or channels that can be used to obtain the information.
- Consider using alternative sources of information for avoiding unnecessary requests, where possible.
- When screening the request, it is important to check whether the information is already available for the national authorities, or specifically for the Dublin Unit (e.g. through previous Dublin cases) to avoid sending an unnecessary request.

#### **Additional remark on the use of VIS as an alternative source of information**

While VIS can be used as an alternative source of information regarding the Member State responsible, an Article 34 request can yield more results about information on family members or other information relevant to the person's application for international protection. See more in [Chapter 1](#).

### *Assess the appropriate and efficient way or channel of receiving the information*

- It is recommended to check if sending an information request is the most efficient and effective way of obtaining the information.
- It can also be assessed if the most appropriate channel to receive the information is through the Dublin Unit. If other national authorities can provide the information, the process might be a lot faster.

#### **Good practice related to screening the requests**

Before sending a request, it is encouraged to consider whether the request relates to the determination of the responsible Member State, or information related to the person's application for international protection. In cases where, according to the available indications, the applicant is known in another Member State, it is good practice before sending a request to consider whether these indications would establish the other Member State's responsibility for the application for international protection or not.

*Check the formal requirements and the scope of the request*

- It needs to be ensured that the scope of the request is within the Dublin III regulation. If the information to be requested is out of scope of the Dublin III regulation, the request for information should not be sent.
- It needs to be verified if the formal requirements for sending the request are met. If the request requires the consent of the applicant, the consent is given in accordance with Article 34(3) Dublin III regulation.

*Liaise with any stakeholders internally if the information cannot be requested*

- If during the screening it is found that the information cannot be requested through the Dublin procedure, the case officer should inform any stakeholders involved and explain the outcome of the screening.
- If it is assessed that the Dublin Unit is not competent in the request, or other authorities can provide the information, it is useful to provide those requesting the information with the alternative sources capable of providing the information more efficiently. This practice is very efficient when it comes to residence permits on grounds of work or studies.
- If the information cannot be requested because more information is needed before sending the request, it is important to liaise with the stakeholders involved, and inform them about what additional document or information is necessary to include when sending the request.

**Additional remark on the alternative sources of information**

An information request is a time sensitive process as Member States have 5 weeks to reply to such requests. For this reason, some Member States consider that for the sake of efficiency and effectiveness, it is important to look for alternative sources of information before sending an Article 34 request. Alternative sources of information can be any database that contains information on entry or stay in a Member State, visa or residence document issued to a person, protection granted to a person, etc. More information on the alternative sources of information can be found in [Chapter 1](#).

**2. Collecting information on the identity of the person**

Irrespective of the objective of the information request, a request for information should contain information on the person that enables the requested Member State to identify the person concerned. It is generally recommended for case officers to collect as much information as possible to make the request as complete as possible by following the steps below.

*Collect information related to the identity of the person*

- Case officers in charge of sending the request are recommended to collect all available information on the person to whom the request relates.

**Additional remark on information related to the identity of the person**

Name or aliases used, date of birth, any documents, photos, fingerprints, Eurodac search results or VIS hits can support the identification of the person.

Fingerprints are a reliable means of unambiguously identifying the person concerned. Where hits in the common information systems like Eurodac/VIS are unavailable, fingerprints are attached to the request for identifying the person concerned in the registry of the requested Member State whenever possible.

### *Collect information related to the person's link with the requested Member State*

- Case officers are recommended to collect any information available in the file on the applicant's potential link to the requested Member State, for example, previous applications, an issued visa, family links, travel route, etc.
- Ensure that any request sent contains the necessary information or indications to support the request.

### **Further reading on evidence assessment in Dublin cases**

For an overview of the different types of proofs used in the Dublin procedure and understanding the process of evidence assessment, you can consult the [EASO Practical Guide on the implementation of the Dublin III Regulation: personal interview and evidence assessment](#).

## **3. Drafting the request**

Once it is established that the information can be requested and all necessary information regarding the applicant is collected, case officers can start drafting the message. There are a couple of formal requirements that case officers need to make sure of, and there are recommendations on the way the message should be drafted.

### *Use the correct form accordingly*

- Make sure that the correct form (Annex V of the implementing regulation) is used, and that it is filled out accordingly.

### *Be specific in your request*

- When drafting your request, be specific in your questions and clear on what information is needed from the requested Member State.
- Use and tick the correct checkboxes on the form to highlight the information you are requesting.
- It is important to be aware of the limitations in the standard form and make the best use of the available space. This way you can ensure that the request is specific, and that it is clear for the requested Member State the information you need.
- When drafting the request, use short, simple sentences. Make sure that your questions are clear and that the request is understandable.
- Choose appropriate type of questions.

For example, consider in your request which type of questions fit your purpose better: open or closed questions? When drafting your message, consider if you would like to have an elaborate reply from the Member State, or would a closed question be a better fit for the purpose.

### **Good practice for referring to previous cases in the request**

If the case file has links to previous cases, it is useful to refer to these, and specify if additional information is being requested.

## **4. Attaching evidence and documentation**

When preparing the request for information, it is important to attach the evidence and documentation that you have at your disposal. Attaching evidence and documentation can support the content of the request and its objective, and it can also help the requested Member State to identify the person in question more quickly.

### *Consider the grounds of the request to assess if attachments are needed*

- Depending on the grounds of your request, if possible, you will need to attach documents to the requested Member State. Consider what is the ground of the request and attach the evidence accordingly.

For example, in specific cases, where the original document is needed, and you are asking the other Member State to send the identity document of the person concerned, attach the indication or documentation that suggests that the other Member State is in possession of that document. In this case, you can attach the statements of the applicant, or, if available, a receipt issued to the applicant by the Member State authority on recording the storage of the document.

### *Attach the relevant evidence necessary for the request*

- Make sure that you attach the evidence necessary for your request.
- If in your request you refer to a previous application, residence document or the statements of the applicant regarding their stay in the requested Member State, make sure that you attach the appropriate documentation that you have at your disposal.

For example, in case your information request is related to the determination of the responsible Member State, you will need to make sure that relevant documentation or evidence is attached accordingly, such as, Eurodac search result, VIS hit, or other.

### *Attach other relevant documents*

- If there are any other relevant documents that might help the requested Member State to identify the person and to provide the information these should be attached to the request, such as, copy of documents.

### **Additional remark on consent**

If the requested information requires the consent of the applicant, the requested Member State authority should ensure that only the information they are entitled to provide is transmitted. Whenever consent from the applicant is needed, the requested Member State ensures that the consent is received from the requesting Member State.

- When the written consent of the applicant is to be sent, it is recommended to specify what the consent relates to, such as, sharing information related to the grounds of the application.

It is preferred by some Member States that a Eurodac search result is attached even when there are no hits. This practice is useful to prove that the person concerned is an applicant for international protection in the requesting Member State.

## **5. Sending the request through DubliNet**

Once the request is drafted and all necessary documents are attached, the case file is complete and ready to be sent through DubliNet.

### *Check the request before sending*

- Apply the four eyes principle to ensure that the request to be sent is in order and meets both the procedural and formal requirements.

### *Use the right codes*

- Make sure that all formal requirements necessary for sending your message through DubliNet are respected.

### *Mark urgency where necessary*

- If an urgent reply is needed, it is encouraged to mark this accordingly in the subject line of the message (by + URGENT) to facilitate the cooperation between Member States.
- It is recommended to mark urgency especially in cases of unaccompanied minors (UAMs), persons in detention, persons awaiting a court decision in order for the requested Member State to prioritise the case.

### **Further reading on sending messages through DubliNet**

For recommendations on sending information requests through DubliNet, consult the ***Recommendations on the operational and technical use of DubliNet***.

## **6. Following up pending cases**

If outgoing or pending cases are monitored, sending a reminder can help to follow cases up.

- When a request is pending with the requested Member State and no reply was received within 5 weeks to the request, you can choose to send a reminder to the requested Member State.

## Checklist 1: Sending a request for information

### Step 1. Screening the information that is to be requested

- ☐ Identify what the request relates to
- ☐ Check if the request is necessary to send
- ☐ Assess the appropriate and efficient way or channel of receiving the information
- ☐ Ensure the formal requirements for sending a request are met
- ☐ Ensure that the request is within the scope of the Dublin III regulation
- ☐ If the information cannot be requested, liaise with any internal stakeholders

### Step 2. Collecting information related to the person

- ☐ Collect information related to the identity of the person
- ☐ Collect information related to the person's link with the requested Member State

### Step 3. Drafting the request

- ☐ Use the correct form, correctly filled out
- ☐ Be specific in your request

### Step 4. Attaching evidence and documentation

- ☐ Consider the grounds of the request and assess if attachments are needed
- ☐ Attach the relevant evidence
- ☐ Attach other relevant documents, if needed

### Step 5. Sending the request through DubliNet

- ☐ Check the request before sending by using the four eyes principle
- ☐ Use the right codes
- ☐ Mark urgency in the subject line where necessary

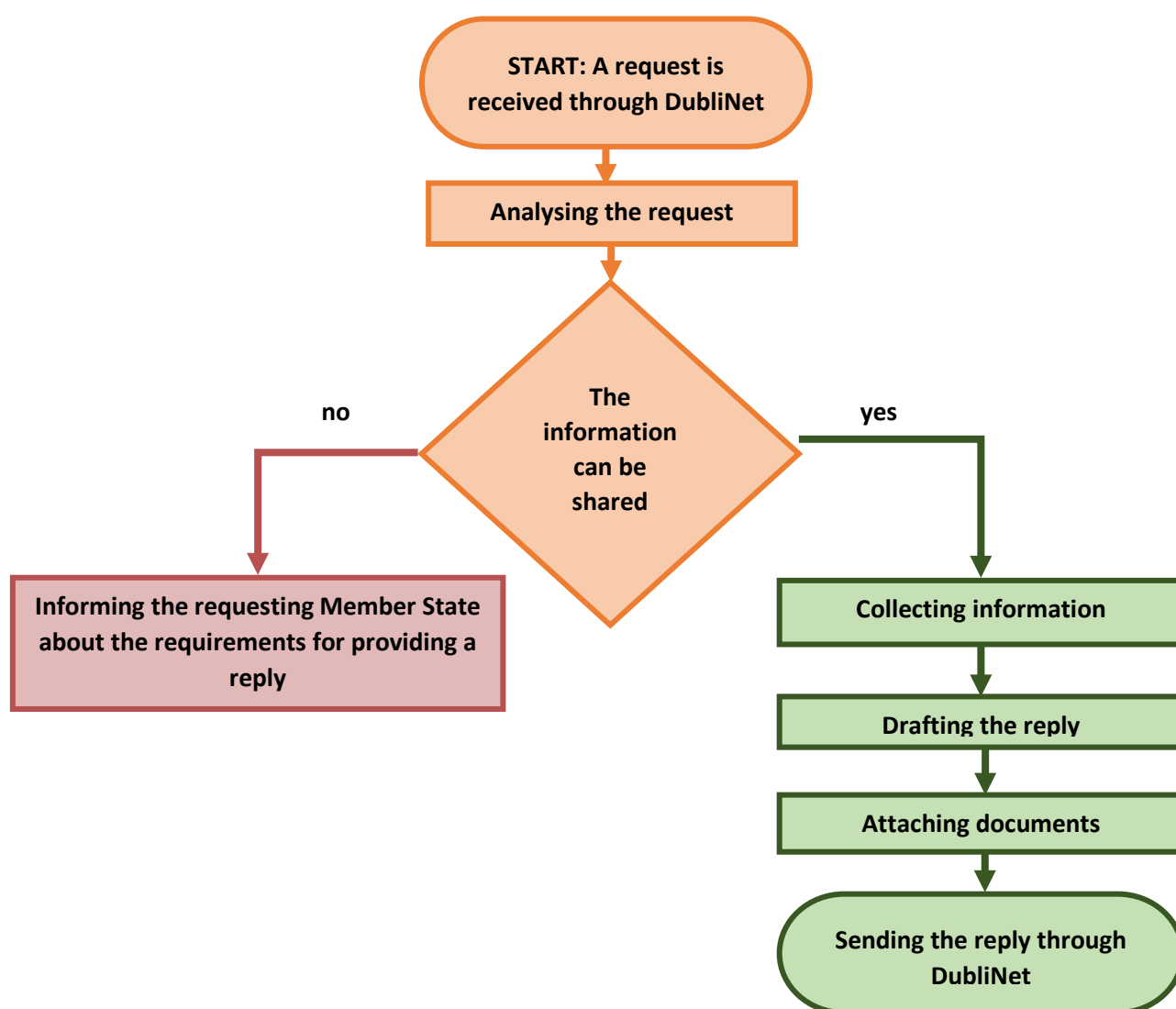
### Step 6. Follow-up

- ☐ Send a reminder if need be

### 3. Replying to a request

#### Standard workflow 2: Replying to a request

The below workflow was developed based on expert level discussions on an ideal workflow for an efficient and effective procedure for sending information requests by Dublin Units<sup>11</sup>.



<sup>11</sup> It is important to note that for the sake of clarity, no prejudice has been made regarding whether the request is sent by the Dublin Unit to determine responsibility or if the request involves other stakeholders needing information when examining the application for international protection. The workflow is intended to cover the best practice regardless of the purpose for sending a request. The elements of the workflow are clickable.



When a request is received, the first step is to analyse what the request relates to and if the information can be provided. Afterwards, case officers can proceed with collecting the necessary information and drafting a message if it is ascertained that a reply can be provided.

## 1. Analysing the request

When receiving a request for information, it is recommended to conduct an analysis of the request to assess what steps are needed for replying to the request.

The below steps are recommended for analysing an incoming request.

### *Identify the person*

- Based on the information provided in the request, identify the person in the national database.
- Check if the person is already known to your authority, has been registered or has previous, linked cases in the system.
- Checks in the system can include search for aliases, checks conducted based on the fingerprints, or look for photos, if available.

### *Identify what the request relates to*

- It is recommended to establish what the request relates to and what information is being requested.
- It is recommended to try to prioritise certain categories of requests such as those marked urgent or those dealing with UAMs.

## 2. Ensure that the information can be shared

The analysis of the request received will lead to an assessment of whether the information that is requested can be shared or not. It is important to verify if all information can be shared, or if there are questions where a reply cannot be given.

### *Make sure that the information can be shared*

- Ensure that the request is in the scope of Article 34 and that the information can be shared in accordance with the rules set out in Article 34 Dublin III regulation.
- Make sure that the information that is being requested is fit for sharing, and no data protection rules are breached.
- It should be checked if there are any formal requirements that should be met to provide a reply.
- If the request is sent in accordance with Article 34(3) Dublin III regulation, check if the consent of the applicant is provided.

## 3. Collecting information

After ensuring that all is in place to reply to the request, the collection of information can start. Depending on the national setup and the way the access to information is organised, the procedure for collecting information on a national level can be different. General recommendations on the procedure for collecting information are outlined below.

### *Collect information related to the person*

- After identifying the person concerned, collect all information that is necessary for replying to the request.
- Check all information in the national database to familiarise yourself with the applicant's case file.

*Collect information related to the questions asked*

- Once familiar with the applicant's case file, it is recommended to look for the specific information that is being requested.
- Make sure that your information is up-to-date, and that it is complete.
- If the information that is being requested is not directly available to your unit, check if you can collect the information by requesting another unit/authority to provide the information.

**Good practice for collecting information when internal stakeholders are involved**

In some Member States, other units or sectors will be contacted within the authority to receive access to the information. In such cases, it may be useful to have internal guidelines regarding the communication and the workflow within the responsible authorities. If liaising is needed with other stakeholders to provide the requested information, it is important to take this processing time into account when working with such requests to endeavour to reply to the request within 5 weeks, or if marked urgent, as soon as possible.

**Good practice on recording the processing of cases**

Some Member States draft a note for the file explaining the type of request received and recording all steps undertaken by the responsible case officer, including, for example, the checks conducted, the stakeholders who were contacted and the information received. This recording can help in the future to identify the different elements considered during the collection for information.

## 4. Drafting the reply

There are no standard requirements related to the format of the replies to Article 34 requests provided by the implementing regulation. In the national practices, there exist various forms of replying to information requests. Some Member States use templates developed on a national level, while other countries provide replies in the free text field of the message that is sent through DubliNet.

*Use an appropriate format for the reply*

- Irrespective of the form of the reply, data protection rules should always be respected.
- It is recommended to provide a reply in a form that is accessible to the requesting Member State by ensuring that it is specific to the individual case, the case is identifiable and correctly referenced, and the format of the reply will comply with the general rules on sending messages through DubliNet.

**Additional remark on standard forms for replying to information requests**

While the implementing regulation does not provide any rules for replying to Article 34 requests, there are special forms to use in case the information exchange is related to unaccompanied minors or dependent persons, in accordance with Article 6(5) and Article 16(4) Dublin III regulation.

Annex VII and Annex VIII implementing regulation are to facilitate the information exchange between Dublin Units with regards to identifying and locating family members of the applicant in situation of dependency or to identify or locate family members of a UAM. Part A of these annexes contain the form to request information, while Part B of these annexes are the form to be used for providing replies.

**Good practice related to replies to information requests**

Some Member States use templates or standard forms developed at the national level to provide replies to information requests in a timely manner. When using such templates, it is good practice to include the reference number of the case in both countries, the personal details of the applicant and any aliases used, as well as the logo or name of the authority providing the reply. Using a .pdf extension to submit replies through DubliNet can guarantee data protection.

*Be specific in your answers*

- When drafting your reply to the request, make sure that you give specific replies to the questions. It is recommended to provide substantially exhaustive replies so that the requesting Member State could acquire the necessary information.
- Ensure that the reply is specific, and that it is clear for the requesting Member State what information you are providing, or which question you are replying to.

**Additional remark on exhaustive replies**

When you provide a substantially exhaustive reply, there is no need for the other Member State to send a follow-up request. This makes the process less time consuming for all parties.

*Ensure that all questions are replied to*

- When drafting your message, make sure to reply to all the questions with sufficient details.

*Provide up-to-date and accurate information*

- Make sure that that you are sharing the latest information that it is accurate, and that you endeavour to send a complete reply by using up-to-date sources.

*If the question cannot be answered, draft your reply accordingly*

- In cases where a reply cannot be given because the information cannot be shared, inform the requesting Member State about the reason for not replying to the question.

For example, if the request relates to information that requires the approval of the person concerned but the consent is not attached, remind the requesting Member State to send the consent of the person.

## 5. Attaching documents

When all the necessary information is collected, it is important to make sure if any document should be attached to the reply. If attachments are to be sent, make sure that you only send what is requested or necessary for the requesting Member State.

*Attach the requested documents as necessary*

- Make sure to attach all the documents that are necessary or are specifically requested by the requesting Member State.
- Make sure that you are allowed to share such documents.

## 6. Sending the reply through DubliNet

Once the reply is drafted and all necessary documents are attached, the case file is complete and ready to be sent through DubliNet. When sending messages through DubliNet general recommendations should be considered.

*Check the reply before sending*

- Apply the four eyes principle to ensure that the reply to be sent is in order and meets both procedural and formal requirements

*Use the right codes*

- Make sure that all formal requirements necessary for sending your message through DubliNet are respected, and that you are using the right codes for the subject line of the message to be sent through DubliNet.

*Mark urgency where necessary*

- If an urgent reply was needed, make sure to mark your reply accordingly in the subject line of the message (by +URGENT).

For recommendations on sending information requests through DubliNet, consult the ***Recommendations on the operational and technical use of DubliNet.***

## Checklist 2: Replying to a request for information

### Step 1. Analysing the request

- ☐ Identify the person to whom the request relates
- ☐ Identify what the request relates to

### Step 2. Ensure that the information can be shared

- ☐ Make sure that the information can be shared
- ☐ Make sure that the request is within the scope of the Dublin III regulation

### Step 3. Collecting information

- ☐ Collect information related to the person
- ☐ Collect information related to the questions asked

### Step 4. Drafting the reply

- ☐ Use an appropriate format for the reply
- ☐ Be specific in your answers
- ☐ Ensure that all questions are replied to
- ☐ Provide up-to-date and accurate information
- ☐ If any question(s) cannot be answered, draft your reply accordingly providing the information that you are able to share

### Step 5. Attaching documents

- ☐ Attach the requested documents as necessary

### Step 6. Sending the reply through DubliNet

- ☐ Check the reply before sending
- ☐ Use the right codes
- ☐ Mark urgency where necessary

## 4. Organising the Article 34 procedure

This chapter is offering a collection of recommendations that managers or practical policymakers can choose to consider for organising the processes in their Member State depending on their resources and possibilities. The ideas were collected based on the discussions held with Member States on organising an effective and efficient workflow for proceeding with information requests.

The way Dublin Units organise their procedure for working with information requests is up to the Member State authority. Discussions among experts on the topic led to a collection of recommendations or existing good practices that are shared in this document. These recommendations regarding the organisation of the procedure were set out by the experts working with the Dublin procedure, including Article 34 procedures.

### Further reading on standards of the Dublin procedure

The [\*EASO Guidance on Dublin Procedure: Operational standards and indicators\*](#) lays down the standards (commonly agreed practices) and their indicators (how the implementation of the standards can be measured) for the Dublin procedure.

## Effective and efficient organisation of the procedure

An effective organisation of the procedure of information sharing in accordance with Article 34 is important to guarantee that all legal and procedural requirements are met. There are many aspects of organising the procedure effectively. Recommendations are also collected below for making the procedure more efficient and making the best use of the available resources.

### Direct access to information

When working with information requests, having easy access to the relevant sources of information can speed up the procedure and ensure an effective information sharing, as well as to facilitate quick access for the applicant to the asylum system.

#### *Have a centralised, direct access to information in place*

- Having centralised access to the relevant sources of information can contribute to a swift processing of cases. A centralised database can connect all the databases used by the authority, such as the case management system for asylum cases or Dublin cases, or access to Eurodac, VIS, SIS, or other relevant databases.
- Having centralised, direct access to relevant databases will enable case officers to conduct searches, consult or update information in the database and extract the relevant information as needed. This efficient and effective way of access can help the case officers to familiarise themselves with all aspects of the case and have all the relevant information at hand in one place. It may also allow a case officer better access to information to be able to quickly determine if an information request is needed or not.

#### *Use a digital case management system*

- If resources allow, it is recommended to have digital case management systems in place for a fast and efficient way of processing information requests.
- A digital case management system can ensure direct access to the relevant databases for all case officers.
- Digital case management can also include access to digital archives, without the need to consult other authorities to get access to complete files of applicants.

### Good practice on working with digital case management systems

Working with digital case management systems can make your job easier because the data of the person concerned are automatically pre-filled by the system. This way of working ensures quicker access to the database, without the need for the case officer to fill in the data of the person concerned. This will allow the case officer to focus on checking if the data is correct and draft the text of the reply.

#### *Have internal standard operating procedures in place*

- It is often considered helpful to have internal guidelines or standard operating procedures (SOPs) for the communication and cooperation between the case officers who identify the need for further information during the examination of an asylum case and the Dublin Unit.
- It is important in an administration that there are clear instructions regarding tasks and responsibilities in relation to information sharing.

#### *Establish cooperation between Dublin case officers and asylum case officers*

To make the exchange of information process more efficient, effective and, to avoid unnecessary requests for additional information, it is generally recommended to set up the frame of cooperation between the Dublin Unit and the units responsible for the examination of international protection.

Internal guidelines on the following questions could speed up the procedure.

- In which circumstances is it advisable to launch a request?
- What kind of information can be requested from other Dublin Units?
- How can the request be best formulated internally?
- What level of detail of information is needed?
- What kind of supporting documents should be attached to the request?

Internal guidelines/cooperation can establish the framework regarding which situations an asylum case officer may initiate the information request. These can also contain specific examples with a non-exhaustive list of what kind of information can be requested, including:

- grounds on which the applicant based the application in the other Member State;
- result of the age assessment;
- results of DNA test;
- evidence submitted by the applicant;
- results of the authenticity of documents submitted by applicant;
- the decision taken on the application;
- any other relevant information within the scope of the Dublin III regulation.

Internal deadlines can be also set that could determine the framework of the communication between the Dublin officer and the asylum case officer and set clear rules for all case officers involved.

### Working with indirect access

It is currently not possible for every organisation to have centralised, direct access to the relevant databases, such as to Eurodac, VIS, or other relevant databases. This is, however, not an obstacle for the effective organisation of the procedure. In cases where Dublin Units have indirect access to information, there are several recommendations that can be considered for an effective and efficient way of working.

### *Conclude working arrangements for information requests*

- It is recommended to organise indirect access by concluding a working arrangement with the authority in charge (e.g., police, border guards, aliens' policing, or others) to organise access to the relevant information for the Dublin Unit.
- A working arrangement between the competent authorities on access to information may cover:
  - the scope of the information that can be accessed
  - timeframe for replying or providing the information;
  - the way the access to the information is organised (for example, by creating a user account to use the database);
  - the list of personnel responsible for the exchange within the authorities;
  - any limitations;
  - and other considerations relevant for the national authority.

### *Establish standard operating procedures on a national level*

- It is recommended to develop SOPs to organise the internal procedure and the indirect access to the information.
- An SOP can describe the roles, responsibilities, and the steps for proceeding to ensure respecting data protection rules, transparency, and accountability by a standard way of proceeding.
- If a working arrangement between the competent authorities is in place, an SOP, governing the cooperation and the internal procedure within the authority can be part of the working arrangement.

### *Appoint information contact points*

- Indirect access to the relevant information can also be organised by appointing information contact points within the different authorities who have the task to share information on a national level with the Dublin Unit when requested.

## **Training and capacity building**

The allocation of tasks to case officers may play a role in the efficiency and effectiveness of the procedure. Awareness raising, increasing understanding on the scope of Article 34 among staff involved in such requests and training can help the efficiency. Allocating tasks to informed and trained case officers contribute to the effectiveness of the procedure.

### *Ensure awareness and basic knowledge on information sharing among staff members*

- It is recommended to raise awareness and basic understanding of the scope of Article 34 to make successful information requests, to increase the quality of information requests and replies, and to limit the time spent on drafting the requests and replies.
- Awareness and basic knowledge on Article 34 among those who are involved in information requests can also contribute to the effectiveness of the procedure. Such awareness and understanding are considered important even if the Member State deals with, in practice, only a few information requests per year.
- It is recommended that case officers at Dublin Units who work with information requests should have a basic understanding of the scope of Article 34, its objectives, and purposes, as well as its limitations.

### *Provide training on Article 34 to staff members*

- It is recommended to provide a basic training course on Dublin, including Article 34 requests, to staff working with such requests or to those involved in the process so to contribute to an efficient and effective procedure.



*Allocate tasks to competent staff*

- Member States may decide to allocate tasks of information sharing only to trained staff members who have a basic knowledge of the use of DubliNet.
- Member States may decide to allocate the task of sending or replying to information requests to competent and informed staff members.

*Provide support by the Dublin Unit*

- Member States may decide that Dublin Units provide support to other units or authorities on a national level regarding the drafting of information requests when other case officers are involved.
- When case officers from different units are involved in information requests, operating a helpdesk, providing information materials, internal training or launching awareness raising campaigns by the Dublin Unit can provide useful support.

## Cooperation between Member States

As specified in Article 34(5), the requested Member State should provide a reply to the request for information within 5 weeks. To facilitate the information exchange between the Dublin Units, Member States can agree on practical terms of cooperation.

### Good practice on cooperation between Member States for following up pending cases

Greece and the Netherlands agreed that to ensure that all information requests are replied to, the Netherlands can send a list of pending cases to Greece to help following up the cases. The list of cases is sent on a regularly basis as agreed by the two Dublin Units. This grouped reminder is deemed as a successful practice in the case of these two countries. However, such practice should only be followed if the requesting and the requested Member States agrees on doing so.

### Good practice on using liaison officers

Some Member States have chosen to have a liaison officer present in other Member States. Liaison officers can support the information exchange for instance by reminding the requested Member State of a pending reply due to the specific nature of that case or if there is an urgency

It is however to be noted that liaison officers cannot replace the formal channel of providing information, but they can act as facilitators of the information exchange by following up cases. Exchange of liaison officers is subject to agreement between the Member States. Therefore, their tasks and scope of activities can be different in the Member States.



