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# ECHA's Human Resources (HR) Strategy 2019-2023

#### Introduction

The Draft Strategic Plan 2019-2023 of the European Chemicals Agency (ECHA) sets out new strategic priorities which take ECHA's current role as their basis, build on ECHA's competences and achievements, recognise the central importance of the legislation that ECHA implements in the EU regulatory system and attempt to anticipate the challenges ahead. ECHA expects that, through the new strategic priorities, it will be able to better contribute in meeting the policy objectives of the legislation and address its challenges, including the outcome of the Commission's REACH Review.

The objective of this human resources (HR) strategy is to enable the achievement of ECHA's strategic priorities by ensuring a work environment in ECHA that facilitates a culture of high performance and flexibility while, simultaneously, recognising the framework within which ECHA operates, notably the Staff Regulations and Financial Regulation. It provides a solid basis for ensuring that ECHA optimises its use of human resources and continues to develop the necessary scientific and technical competencies.

It is important, at the outset, to provide a description of the scope and purpose of ECHA's new strategic priorities. Firstly, ECHA, together with its partners, will use its competencies and comprehensive knowledge of chemicals on the EU market to identify groups of substances of concern, decide which regulatory action is needed and take the necessary action under REACH, BPR and CLP, or under other relevant legislation, such as OSH (Strategic Priority 1). Strategic Priority 2 takes the knowledge emanating from Strategic Priority 1, uses the legislative obligations of industry set out in REACH, CLP, BPR and PIC and ECHA's mandate therein, and aims to improve the knowledge and capacities in industry to take action before ECHA does. Finally, Strategic Priority 3 also takes the knowledge coming from Strategic Priority 1, uses it within ECHA's mandate to improve the consistency and integration within the EU chemicals regulatory system and contribute to the international work on chemicals management. ECHA will, thereby, be ready to continue its 10-year track record on delivering on its core tasks while, should the EU decide to do so, take on additional implementing tasks from more pieces of legislation, thus establishing synergies and consistency between various pieces of legislation.

In implementing the Strategic Priorities, ECHA will build on its competencies, knowledge, and experience, and improve its collaboration with the Member States' competent authorities, other national and EU Agencies and its stakeholders, remaining focused on delivering sound science-based opinions, decisions and advice. In addition, ECHA will continue adapting its processes, methodologies, tools, and staff competencies to reflect the advancing science, technology and changes in the regulatory environment. ECHA will also actively explore the potential of IT-based approaches, using opportunities offered by new developments in search and computing algorithms. It is also expected that the international dimension of ECHA's work as a cross-cutting element will increase further.

The successful execution of the new strategic priorities requires sufficient resources, infrastructure, knowledge and competencies to be available, while maintaining a high level of efficiency, motivation and staff wellbeing. ECHA's Draft Strategic Plan 2019-2023 has identified an enabling area of operation – 'Maintain and build identified staff competences for current and future tasks' – that provides a focus on the development and strengthening of sufficient scientific, technical and administrative competence for current responsibilities and future needs by ensuring robust processes for people and resource management and, in addition, fostering a culture of flexibility and adaptability that supports agile internal deployment and mobility and a

dynamic organisational structure. This HR strategy outlines the HR priorities and key actions that ECHA will take to make optimal use of the combined resources deriving from the various regulations under its remit in a context of limited fee income and the need to contain the European Union (EU) balancing subsidy, in light of existing and future budgetary constraints.

#### **Operating environment**

It is to be noted that the core mandate and specific tasks of ECHA, as laid down in the four regulations that it implements, will continue to be the backbone of its future activities. As a result, the majority of human and financial resources will continue to be consumed to ensure that the registration, evaluation, restriction, authorisation and classification processes under REACH and CLP deliver the impact that the legislator has attributed to them. While the 2018 registration deadline was the final regulatory deadline of the REACH registration for phase-in substances, it should be noted that the registration activity is expected to remain at a high level during the period of this strategy. In addition, the implementation of the recommendations of the Commission's 2018 REACH Review provides clear guidance for ECHA's future direction, including an increased focus on the level of compliance of registration dossiers, enhancement of evaluation, authorisation and restriction processes, and the expectation that ECHA would become a reference for the sustainable management of chemicals. Similarly, the processes under BPR and PIC remain significant contributors to manage risks and achieve a higher level of safety to human health and the environment. In parallel, ECHA has undertaken a strategic analysis of its future direction and has identified certain existing activity areas that are expected to grow and a number of potential new tasks that ECHA may assume, at the request of the Commission and/or legislator, during the time-frame of its Strategic Plan 2019-2023.

It is noted that the timeframe of this strategy contains a number of inherent uncertainties for ECHA that have a significant impact on its planning process. It is, therefore, important to clearly signal these uncertainties so that the budgetary authority appreciates that further refinement of ECHA's activities, and associated resource allocation, may be necessary as more clarity on these uncertainties emerges. Firstly, it should be recognised that the engagement of human resources is inextricably linked to the availability of necessary financial resources. Here, the fact that ECHA is required to accurately forecast its fee income streams, for both REACH/CLP and BPR, to calculate the required EU balancing subsidy will continue to be problematic as the fee income is dependent on market behaviour and the strategies of individual companies. Therefore, this inherent uncertainty will continue to impact ECHA's operational stability and financial planning. In this context, a priority for ECHA is to examine, with the Commission, alternative options to ensure sustainable income (and, consequently, human resources) that will enable ECHA to implement its Strategic Plan. As outlined above, the implementation of the recommendations of the Commission's REACH Review will focus the activities and workload of the Agency. It is also anticipated that the negotiations on the UK withdrawal from the EU will be finalised in 2019, with potential repercussions on ECHA's budget and workload, particularly in the initial years after the effective date.

It is also noted that the current Multi-annual Financial Framework (MFF) concludes in 2020. For 2019 and 2020, therefore, ECHA will continue to comply with the overall programming of human and financial resources, in line with the Commission Communication on the resourcing of EU Agencies. It is ECHA's view that the new MFF (for the years 2021-2027) should take account of the necessary resources required for the growth in ECHA's existing tasks and the potential new tasks to be assumed by ECHA. The basic philosophy underpinning ECHA's capacity to resource this growth in existing tasks and undertake new tasks is that ECHA should be adequately resourced from the planning phases, as determined in the pertinent legislative and financial statements. In essence, ECHA requires long term human and financial resources stability so that the necessary competencies to fulfil its increasing mandate can be adequately developed and retained.

#### **Human resources practice**

ECHA will continue to maintain its low vacancy rate for all regulations and implement proactive human resource management practices (for example, recruitment and selection, performance appraisal, contract renewal and career development) to maintain a healthy level of staff turnover. ECHA will also continue to carefully monitor its establishment plan and ensure good forward planning with respect to recruitment, mobility and promotions. This will include consideration of changes in the recruitment grades of profiles to maintain and build scientific competence, enhance overall organisational performance and optimise the utilisation of ECHA's allocated human resources within the overall establishment plan. If ECHA cannot maintain its full REACH/CLP establishment plan, it will examine the use of additional flexibility measures (for example, posts conversion) to ensure that it has the necessary human resources in place to implement its work programme, including modifying ECHA's establishment plan, in accordance with ECHA's Financial Regulation. Finally, ECHA will also continue to cooperate closely with the Commission services, the Network of EU Agencies and the Network of Fee Receiving Agencies (EFRAN) in areas of human resources management that are of mutual interest.

The continued execution of its existing (growing) tasks and the implementation of any new tasks is enabled through a combination of a continuous focus on seeking efficiencies and synergies, giving lower priority to other tasks and the allocation of additional resources to ECHA. ECHA will continue to take steps to further improve efficiency in its operational and administrative processes, with the aim of increasing its operational output, and will continue to report on efficiency gains in the context of the Commission's annual Job Screening Exercise. In addition, while the fundamental principle is that new regulatory tasks should be combined with adequate additional resources (financial and human), ECHA's management team, supported by the HR unit, will continue to redeploy available resources and seek efficiencies and synergies to create capacity for the implementation of new tasks that require low staff intensity.

ECHA is largely an IT-based Agency, viewing IT as key enabler for the regulatory work that it carries out. ECHA will continue to invest in IT tools to enable efficiencies, both for companies that have regulatory obligations to submit data to ECHA and to Member States, and for authorities that are using this data under the regulations, and for any potential future roles in adjacent areas of chemicals regulation. This also has an international dimension as common tools and formats support efficiencies at international level, both for authorities and industry through promoting interoperability and exchange of data across systems. Therefore, as the human resources consumed on IT are planned to remain stable, after the intense years of building new IT systems, emphasis will be placed on the maintenance of those systems where the achievement of further efficiency gains is a priority.

In summary, ECHA is committed to allocating its resources in the most efficient manner possible and redeploying available resources to priority areas. Through implementation of this HR strategy, which comprises both existing and new practices, ECHA will continue to invest in proactively building the necessary staff competences, and achieving flexibility in reallocating resources, to effectively manage the changes in its legal mandate and policy objectives.

#### **Human resources priorities**

The strategy will be implemented under four priority areas, each of which contains a set of key actions, which will be planned, implemented and monitored to secure the effective roll-out of this strategy. The strategy will result in a five-year implementation plan which will contain clearly defined activities, milestones and a process for reviewing progress on its implementation. Periodic updates will be made available to staff and management and a review of the strategy and its implementation will be undertaken in 2021.

#### 1. Develop ECHA's competency base for current and future tasks



Competency management and strategicallyaligned learning needs identification are the key to a forward-looking knowledge-based organisation such as ECHA

Given the nature of ECHA's mandate, it is essential that its people have the right balance of competencies, experiences, attitudes and qualities that will enable them to succeed in their demanding roles. ECHA's team must be reliable, flexible, innovative team players and problemsolvers. With a relatively stable workforce in place and low turnover rates, a key concern is to broaden the competency base of the current ECHA staff for current and future tasks. ECHA's unique strength is the application of its competence to implement legislation and, therefore, staff development is concerned with

the application of competence to more and more (parts of) legislation. ECHA's new organisational structure bundles these competencies and places the processes closer to one another, where these competencies are needed, thereby enabling staff to learn to apply their competencies more easily and broadly.

An important element of this strategy is to ensure that skills and competencies acquisition is not only developed through formal training courses, but rather through on-the-job learning ('learning by doing'). Therefore, for ECHA to be successful, it becomes increasingly important to share the knowledge that it possesses in-house and to understand the work that colleagues are undertaking so that it can gain efficiencies, create synergies and learn simultaneously. The competencies that ECHA possesses today are largely the competencies required to implement other chemicals legislation. Alignment of ECHA's competency base to its operational requirements is, therefore, central to taking on new tasks. This will also assist ECHA in deciding on the appropriate course of action to take when allocating human resources to new tasks (including consideration of internal mobility, on-the-job training, external training course or external recruitment).

It is also important for ECHA's staff to acquire knowledge, manage their career paths and avail of the range of learning programmes on offer that are aligned with ECHA's strategic and operational priorities. Further enhancing career and learning opportunities for all ECHA staff remains a priority in the years ahead. As outlined in ECHA's Learning and Development framework, most learning occurs on-the-job where our staff members learn from their own work experience, from colleagues and from organised training courses; for example, our senior experts have the capacity to become mentors with a specific set of tasks and objectives. This will require a change of mind-set and working culture so that we can move from a class-room focussed training experience to a situation where the on-the-job learning is prevalent.

# **Key actions**

- Continue to advance learning and development options, addressing a range of competencies and utilising innovative formats and technologies, to make learning more effective and bring it closer to learners.
- Promote a culture of continuous learning ('learning by doing') to embed organisationwide knowledge transfer and facilitate enhanced collaboration and versatility.
- Review ECHA's current Learning and Development Framework and ensure that it is closely aligned with ECHA's new strategy.
- Support ECHA's management team in introducing a revised competency mapping framework that is actively promoted by management, reflects ECHA's current needs and informs decision-making on potential new tasks.
- Examine options to provide additional developmental opportunities for staff, including strategic secondments to partner organisations

#### 2. Build a high performing, flexible work environment



ECHA depends on the contribution of its highly qualified staff from diverse disciplines and is committed to building a high performing, sustainable work environment that facilitates a culture of teamwork, innovation and wellbeing at work.

ECHA, as a knowledge-based organisation entrusted with the implementation of the EU's chemicals management legislation, depends on high performing colleagues who are highly-educated and equipped with specialist knowledge and competencies from diverse academic disciplines. This means that ECHA's way of organising its work – starting from the physical environment, to values and HR policies – must reflect the needs and expectations of its staff.

The experts employed by ECHA expect leadership to allow them to contribute to the Agency's deliverables most effectively, based on their individual skills and competencies. In order to be motivated, they need a level of empowerment that is commensurate with their expected output and level of responsibility. ECHA's staff want to know who depends on their contribution and to be able to work with those colleagues trustfully, which requires effective communication channels and teamwork that will increasingly extend beyond traditional organisation boundaries such as units or directorates, and will, thereby, facilitate enhanced agility and flexibility. In addition, the organisation needs to be flexible to allow for regular job changes with new challenges, by means of internal mobility or project work.

Flexible workforce planning serves the interests of ECHA's staff to expand their knowledge and professional experiences and is imperative to prepare ECHA for a future that will involve growth in existing tasks and integration of new tasks and processes. In this environment, a central role for the HR unit will be to plan the Agency's human resources according to its strategic priorities and to on-board colleagues with new skills and competencies while, simultaneously, maintaining

the motivation and commitment of its existing staff. This can be achieved by instilling a culture of versatility and flexibility in the use of our resources that is supported by a dynamic organisational structure and culture.

ECHA's new organisational structure is appropriate to support the way that we work. It meets the criteria set for a change in structure; staff development, efficient ways of working and facilitating ECHA in taking on new tasks. In addition, the new organisational structure - based firmly on competencies and a staff who know how to apply their competencies to different pieces of legislation – will enhance ECHA's ability to take on new tasks.

ECHA is proud of the diversity of its staff which, we believe, is one of its great strengths as an organisation and assists in finding innovative solutions to achieve its objectives. ECHA remains committed to attracting, retaining and developing a staff base that is diverse in the broadest sense, in terms of geographic balance, gender, language, age and disability, in addition to background, experience and competencies. ECHA believes that a diverse workforce flourishes where there is a culture of inclusion, so it seeks to create an inclusive working environment in which all staff feel valued and respected irrespective of difference and are enabled to perform to their optimum level.

ECHA's physical work environment, together with its HR policies related to the organisation of work, needs to serve the needs of its staff. ECHA will move to a new building in 2020, which will be equipped with state-of-the-art working and meeting facilities that respect health and safety at work and will facilitate collaboration and teamwork. HR policies that aim at empowering staff to organise their work in a manner that achieves a sustainable work-life balance, while respecting the needs of their colleagues and the interests of the service, will be further enhanced, where appropriate. Following the staff policy framework set by the European Commission, ECHA will strive to customise these rules to reflect the Agency's specificities through consultation with its network and providing input to the drafting process at Commission level. In this respect, the HR Unit will continue its active involvement in relevant Commission-led Committees and Working Parties.

## **Key actions**

- Work closely with ECHA's management team to seek efficiencies and synergies that create capacity for the implementation of new tasks that require low staff intensity and report progress in the Commission's annual Job Screening Exercise.
- Continue to facilitate conditions whereby staff are able to work collaboratively across different processes and pieces of legislation.
- Continue to develop practical strategies and solutions for monitoring, reducing and mitigating risks that affect staff health, wellbeing and work-life balance.
- Continue to promote a working culture that facilitates open communication and work closely with ECHA's Staff Committee and external partners to address staff-related topics.
- Review ECHA's people principles to ensure alignment with ECHA's desired working culture and values, and contribute to the organisational review of ECHA's values.
- Continue to ensure that ECHA's specificities are accurately communicated and reflected in the development of HR policies and practices through continued cooperation with the Commission's Standing Working Party, HR-specific Committees and the EU Inter-Agency Network.

#### 3. Promote staff engagement by facilitating career development opportunities



The promotion of pragmatic career development opportunities that align organisational needs and individual expectations is vital in sustaining staff engagement and motivation at all levels in the organisation.

ECHA is committed to a performance management system in which individuals take responsibility and are held accountable for their performance, are recognised for their achievements and are mentored to develop their potential. When performance falls below expectations, it is essential that areas for improvement are clearly identified, that staff receive

accurate, timely feedback and that appropriate improvement opportunities are provided. Trust in the performance management system will be reinforced by systematic, fair and transparent procedures to assess the suitability of staff for new roles and assignments. Managers bear a particular responsibility for fostering a culture of trust, transparency, honesty, dialogue, collaboration and innovation.

ECHA will identify itself as an employer of choice to position and promote the organisation to the professionals that we currently employ, and the talent base that we will target in the future. For this purpose, a modern employer brand is important and ECHA should ensure that every function within the organisation understands the value of such a strong employer brand to the success of the business and the key role that they have in sustaining a consistent brand experience and reputation.

Continuous career and talent development stimulates the work environment, maintains competencies that are aligned to the business needs, motivates staff and encourages discretionary efforts from staff members who feel appreciated and empowered. Internal mobility will be implemented in a way that builds competencies and experiences that are supportive of career development and is aligned with evolving organisational needs. ECHA will enhance its practices in recognising the value of staff accomplishments, creativity, team-work and innovation and will enable staff and managers to combine horizontal and lateral career moves, to achieve both individual and organisational objectives, thereby complementing the flexible environment that ECHA requires for the future.

## **Key actions**

- Develop practices (for example, competency mapping) that support the assessment of current and future capacity gaps and projected staffing needs to better inform ECHA's workforce planning and ensure the optimum use of human resources.
- Examine alternative options for the engagement of interim placements for peak-in-workload and specific project assignments.
- Develop an employer brand for ECHA and ensure its continuous evolution to remain competitive on the market.
- Devise complementary methods for recognising performance (outside the performance appraisal and reclassification exercises) at individual/team level.
- Design and implement a succession planning programme to ensure the continuous availability of key scientific, technical and managerial expertise.

 Continue to seek synergies in HR processes with other EU Agencies and develop, together with comparable EU Agencies, close connections with pertinent European universities and national authorities to ensure the availability of desired scientific and technical competences.

## 4. Enhance management and leadership capabilities



Developing current and future managers to proactively influence, motivate and empower staff in the achievement of organisational objectives is critical for a high performing organisation.

As consistently reflected in staff surveys, ECHA's staff is proud of its work and is highly motivated and committed. This motivation can inspire excellence, particularly when supported by strong leadership. ECHA's managers play a critical role in its organisational culture and, specifically, in facilitating an agile and flexible work environment in ECHA. ECHA looks to its managers as leaders, coaches, mentors and role models who are responsible for facilitating the development and performance of their teams and creating enabling

environments.

Leaders should have the capacity to unleash the potential of individuals for the benefit of the overall organisational purpose. ECHA's leaders should explore their potential as servant leaders, not focussed solely on their unit achievements, and should be capable of seeing the 'bigger picture' to achieve the strategic objectives of the Agency.

It is important that ECHA's managers share a common vision, are able to communicate this vision transparently to staff and stakeholders and can set a clear direction for staff to be confident and trustful. ECHA's leaders need to act together as a united management team while leading their functional teams, in alignment with the strategic organisational objectives and, whenever needed, presenting a common narrative that is understandable at all organisational levels. ECHA's management team also need to be ready to seize opportunities when they occur, manage risks and build relationships with internal and external stakeholders to ensure the sustainability of the Agency. ECHA needs to be credible in the eyes of our stakeholders when it comes to the use of resources allocated to ECHA and, again, managers must be aligned and demonstrate a shared understanding with respect to the organisational planning and use of resources at organisational level.

## **Key actions**

- Strengthen the role of managers in the development of staff's careers that balances organisational needs and individual aspirations, including a strong focus on facilitating organisational agility and flexibility to be able to respond to changes in the operating environment.
- Develop ECHA's leaders through processes that include assessment, coaching, shadowing and feedback mechanisms, with a sharp focus on ECHA's values.
- Promote best management practices and processes to strengthen ECHA's management capacity and create an enabling work environment for staff.
- Revise ECHA's current leadership programmes to ensure a sound appreciation of general management issues.
- Devise and implement strategies to facilitate identified staff to attain valuable experience at the next career level.

#### Conclusion

The successful execution of the new strategic priorities identified in ECHA's Draft Strategic Plan 2019-2023 is dependent on the development and strengthening of sufficient scientific, technical and administrative competence for current responsibilities and future needs by ensuring robust processes for people and resource management and, in addition, fostering a culture of flexibility and adaptability that supports agile internal deployment and mobility and a dynamic organisational structure. This HR strategy outlines the HR priorities and key actions that ECHA will take to make optimal use of the combined resources deriving from the various regulations under its remit in a context of an increasing mandate, limited fee income and the need to contain the EU balancing subsidy. The strategy will result in a five-year implementation plan and a process for reviewing progress on its implementation, including periodic updates to staff and management.