



14.12.2023

FFPE Flash Info - Use of "Signal" for BCP Exercises



Dear Colleagues,

The FEDERATION is supporting the interrogations of our **FFPE colleagues** in Luxembourg who first raised their concerns and addressed a recent development concerning the use of the "Signal" messaging app for Business Continuity Plan (BCP) exercises, which has been introduced without prior consultation with trade unions. Why do we need this? What is the purpose? What is it all about?

Many staff members in Luxembourg have been asked by their hierarchy to install the "Signal" app on their personal phones, some of them even during the weekend!

But it is not only limited to a site as now it is also requested for major sites like **Brussels**.

While the administration has indicated that this is on a voluntary basis, it seems to be from middle management an implicit expectation for all of us to comply with the installation.

The FEDERATION wants to clarify that :

1. No one has to be forced to install third-party apps on his/her personal devices
2. If you choose not to install "Signal", your Head of Unit must/should find an alternative means to contact you.
3. Other tools are already available for contacting staff as TEAMS widely installed on devices and also on mobiles.
4. This must not become a means to be always available or to monitor your reception; even less it must not be an obligation to reply to your hierarchy as they have other means to contact you and -anyway - only during working hours.

But also we would like to raise the following issues :

For business continuity, there is NOAH in principle. Apart from this guide adopted at the end of November, the page does not provide for the use of Signal. For more info see : ([Guidance \(europa.eu\)](https://european-civil-service.europa.eu/)),

This raises several questions:

1. What is the legal basis for asking a staff member to use an external application?

2. Consent: but is it really free consent? But then it is not very clear in the instruction that we can refuse (we already have Noah for this) or have another way;
3. No document/ Data Protection record provides Signal as a parallel system to NOAH. Moreover, no document seems to provide for the use of Signal.
4. This forces staff/and externals to share their private numbers with lots of people (in groups we see everyone's numbers); this in addition to the risks of having the members of all the commissions in an external application;

We also acknowledge and understand that not installing the app may place an additional burden on the Heads of Unit, who were requested to pressure their colleagues in their unit to download the app; further, if they didn't succeed in doing so, may be perceived as non-compliant, increasing the pressure on them.

On the other hand, as we are approaching the annual evaluation, many colleagues could not feel at ease saying "NO" to the person who will write the appraisal in several weeks from now – namely their Head of Unit.

This issue is even more awkward as it comes from directors, who request Heads of Unit, that request to Team Leaders to monitor the replies received from members of the service. **This is unacceptable!** We don't want to be monitored this way! And without prior discussions on the reasons behind and all legal and ethical aspects!!

We insist on the fact that the choice to install "Signal" on your personal device remains entirely yours.

The FEDERATION recalls what we said for years now!

The administration should not rely on employees' personal phones for official BCP communication. If there is a need for a dedicated communication channel for BCP purposes, the administration should explore alternatives, such as providing company phones, offering remuneration for using personal devices or any other non-invasive means.

The unilateral decision to introduce "Signal" without proper dialogue with trade unions raises significant concerns. It reflects not only a lack of consideration for a proper social dialogue, and we view this as an "acte de force" by the administration.

The FEDERATION is committed to ensuring that the rights of our staff members are respected. We urge the administration to engage in meaningful dialogue with us to find a mutually agreeable solution, and to suspend if not stop this nonsense. We need the Administration to come and tell us what is all about! We will raise the issue in the Central Staff Committee for action!

Please feel free to reach out to us with any concerns or questions. We are here to support you and ensure your voice is heard.

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