

Secretariat-General (SG)  
Unit SG.C.5 – Digital Solutions & Process Efficiency

## Project Charter

### Electronic Access to European Commission Documents (EASE)

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The latest version of this controlled document is stored the [EASE project collaborative space](#).

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## 1 EXECUTIVE SUMMARY

Any citizen of the European Union (EU), or any natural or legal person residing or having their registered office in a Member State, has a right of access to documents of the EU institutions, bodies, offices and agencies, subject to the principles and conditions defined in Regulation (EC) n° 1049/2001<sup>1</sup>. The process of preparing a Commission reply to such applications is often a complex task, bound by strict deadlines and involving multiple stakeholders. The good communication and cooperation between the applicant, Commission services and, when applicable, third parties is essential throughout all the phases of the process.

The Electronic Access to European Commission Documents (EASE) project aims to design and develop a one-stop-shop, fully integrated solution that will be used for the submission and handling of the entire lifecycle of the applications for access to Commission documents. It will replace and improve GestDem, the current information system used for this purpose, whose support will end after 2020 [7].

The project covers two parts:

- a) A public online platform through which the citizens will be able to submit and have an overview of their applications, communicate with the Commission, as well as receive the (fully or partially) released documents;
- b) An application management system allowing the Commission to handle the applications for access to documents. Among other things, this implies registration and attribution of applications, consulting third parties, possibility to choose an appropriate template for communication with the applicant, sending the reply or the decision to the applicant etc.

In addition, the new information system will allow both the applicant and the Commission to better identify previous similar applications for access to documents, as well as documents disclosed as the result of such applications. The Commission will also be able to extract more meaningful statistics and to better monitor the respect of statutory deadlines. Importantly, the new IT tool will be designed in a way as to comply with the requirements laid down in the Regulation (EC) n° 2018/1725<sup>2</sup> ('data protection by design and by default'). Finally, the new IT tool will reuse the currently available corporate or ISA<sup>2</sup> components as much as possible.

With this information system, the Commission will increase its productivity, decrease operational expenses (e.g. postage), reduce margins for errors and provide quicker and more consistent replies to the applications. This will increase the quality of service and reinforce the Commission's image as a modern and transparent public administration. More broadly, it will make the EU decision-making process more transparent and bring it closer to its citizens.

## 2 CONSIDERATIONS ON THE BUSINESS CASE

The Business Case [10] built upon a comprehensive study conducted in 2018 in the context of the ISA<sup>2</sup> action 2018.05 'Electronic access to European Commission documents - Study', the stakeholder consultations [8], combined with the fact that the current IT tools used for handling applications to access to documents are fragmented and partly based on a

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<sup>1</sup> Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents, Official Journal L 345 of 29.12.2001, p. 94.

<sup>2</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, Official Journal L 295, 21.11.2018, p. 39.

technology (ColdFusion) that will no longer be supported after the end of 2020, have shown the urgent need for a new modern IT system.

## 2.1 Alternatives

The aim of the Business Case [10] for the EASE project was to ensure that the Commission would be equipped with modern, electronic and integrated IT tools in a timely manner. It explored four alternatives:

- A. Do nothing;
- B. Use the Alaveteli solution, employed by AskTheEU<sup>3</sup>;
- C. Use CASE@EC, the corporate solution for case management, developed by DG COMP;
- D. Develop a building-blocks based solution, reusing the existing ISA<sup>2</sup> and corporate building blocks.

The analysis of Strengths, Weaknesses Opportunities, Threats (SWOTs) selected option D 'Develop a building-blocks based solution' reusing corporate building blocks (e.g. EU Login, EU Access, EU Send, CNS, eSignature) and existing tools (e.g. Compass Corporate, DORIS).

## 2.2 Alignment with the European Commission Digital Strategy

The EASE project answers the five principles of the Commission's Digital Strategy as follows:

1. **Digital by Default and Once-only** – The project aims at automating the overall process of submitting, attributing and assessing the requests for documents (currently only partially supported). It will also reduce the need for a manual encoding of formal outgoing and incoming correspondence;
2. **Openness and transparency** – The solution will allow the citizens to search and retrieve previous applications as well as documents released as the result of such applications, thus leading to enhanced transparency. In addition, the system will make the process of submitting the new applications, as well as tracking their respective statuses, easier and more user-friendly;
3. **Interoperability and cross-border** – Reusable components of the IT system will be put at disposal of any national administration. In addition, the project will explore synergies with ISA2 building blocks and corporate solutions like the Commission Register of Documents;
4. **Security and privacy** – The new system will provide for the systematic identification of personal data dealt with in the process of handing applications for access to documents, and their easy retrieval or deletion at a later stage. It will thereby ensure compliance with the requirements laid down in the Regulation 2018/1725 ('data protection by design and by default'). The Commission's Data Protection Officer has proposed using the new system as a best practice example in this respect. In addition, the transfer of documents between the Commission, third parties consulted and applicants will be done in a more secure way than it is currently the case;
5. **User-centric, data-driven, agile** – The project will bring the fragmented and outdated solutions currently in place for handling requests to documents under a single IT solution. It will support the entire process of attribution and assessment of the requests for documents, third party consultations, as well as drafting and sending of the replies to the applicants. The applicants will have an overview of the applications

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<sup>3</sup> A website managed by an NGO 'Access Info Europe' based in Madrid. It is an online platform helping the citizens to create and send access to documents requests to the EU institutions.

they have submitted, including their respective statuses, as well as a guidance when submitting a new application.

### **2.3 Endorsement**

The Information Technology and Cybersecurity Board has endorsed the Business Case on 14/02/2019.

### 3 PROJECT DESCRIPTION

#### 3.1 Scope

##### 3.1.1 Includes ("IN" Scope)

- EASE Information system:
  - The in-depth analysis of the requirements and design of the future 'access to documents' business processes,
  - Technical architecture of the online platform for citizens and of the management system for handling the applications for access to documents,
  - Development of the online portal for applicants and third parties. It will enable the public to request documents, communicate with the Commission and access the (fully or partially) released documents through the platform. The tool will allow electronic communication between third parties and the Commission on the consulted cases,
  - Development of the management system for the handling of requests for access to documents,
  - Search functionality to allow the potential applicants and/or the Commission to search for the previous applications, documents disclosed, Commission replies, applicants etc.,
  - Leverage synergies with existing and future corporate solutions like Hermes/Ares/Nomcom (HAN), the public Register of Commission Documents, EULogin, eSignature, eSeal, eConfidentiality, Poetry, Secunda/MAUS,
  - Align with the data protection principles outlined in Regulation (EU) 2018/1725 and Regulation (EU) 2016/679.
- Align with the European Commission Digital Strategy, as outlined in Section 2.1 above
- Data migration: The new system shall integrate data available in GestDem, the IT tool used currently for handling the requests to documents, in order to ensure business continuity and improve its search capabilities,
- Business implementation: Project plans to provide the appropriate communication and training materials to the stakeholders and users of the system,
- Providing third parties with components for secure electronic exchange of information.

##### 3.1.2 Excludes ("OUT" Scope)

The project will not consider the following components, which either are covered by existing projects or would need to be implemented as separate projects:

- The repository where the documents are stored (Register of the Commission Documents) is out of scope,
- The automatic public release of correspondence relating to requests for access to documents,
- Requests for documents from Member States not specifically requesting access under Regulation 1049/2001, and from other EU institutions, as they are out of scope of Regulation 1049/2001 and are handled according to the principle of sincere cooperation laid down in the Treaty (Article 4(3) TEU). Requests for documents from

third countries and international organisations are out of scope of Regulation 1049/2001 and are handled via diplomatic channels.

### 3.1.3 Scope Statement

The project ensures that the new IT solution is a one-stop shop for submitting and handling the applications for access to Commission documents under Regulation 1049/2001. This includes the means for the public to submit applications for access to documents, to track them and to communicate with the Commission.

From the Commission's perspective, it provides an end-to-end electronic system that supports the business processes involved in handling initial and confirmatory<sup>4</sup> applications.

## 3.2 Success Criteria

The Project Steering Committee will use the following Key Performance Indicators to measure its success:

- Wide uptake and positive evaluation of the new IT system by Commission staff (75 % satisfied or very satisfied),
- Wide uptake by citizens of the new means of communicating with Commission services on applications for access to documents, resulting in 90% of requests lodged by electronic means in the first two years, aiming for 95% afterwards,
- 20 % reduction in the time needed for the administrative handling of applications for access to documents,
- Fully electronic communication flows with the applicant and third parties,
- Data protection: compliance with the principles related to the processing of personal data in the framework of the handling of applications for access (data protection by design and by default).

## 3.3 Stakeholder and User Needs

ID	Need Description	Priority
N1	<p><b>Search</b></p> <p><u>Business description of the current situation</u></p> <p>Citizens are able to search for the publicly available Commission documents via the Commission Register of Documents. The current GestDem tool allows only the Commission to search for applicants, applications and documents to which access was requested and disclosed.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will extend the existing functionality:</p> <ul style="list-style-type: none"> <li>• Potential applicants will be able to search for previous and ongoing</li> </ul>	HIGH

<sup>4</sup> The initial requests (around 6000 per year) are handled by the Commission's Directorates-General. In case of a Commission's partial or fully negative reply to the request, the applicant can file the confirmatory application (around 300 per year). Such requests are handled by the Commission's Secretariat-General.

	<p>applications for access to documents and documents disclosed as the result of such applications</p> <ul style="list-style-type: none"> <li>Commission users will be able to search for similar previous applications, applicants, documents requested/disclosed, Commission replies/decisions as well as the applicable case law. They will also be able to leverage solutions as corporate search</li> </ul>	
N2	<p><b>Deadline management</b></p> <p><u>Business description of the current situation</u></p> <p>The current solution provides limited feedback on deadline management.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will improve the support for deadline management. It will provide communication improvements, automatic notifications and alerts in different situations (e.g. in case of approaching deadlines).</p>	HIGH
N3	<p><b>Identify users</b></p> <p><u>Business description of the current situation</u></p> <p>The current solution provides a mechanism to identify users for initial applications.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will offer similar functionality, based on best practices in user access management.</p>	HIGH
N4	<p><b>Submit application</b></p> <p><u>Business description of the current situation</u></p> <p>The current solution provides limited capabilities for application submission. The applicant has limited guidance for initial applications and the system does not support electronic submission of confirmatory applications.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will improve the user experience based on best practices. It will make the process of submitting the new applications easier and more user-friendly. It will also allow the applicant to submit a confirmatory application electronically.</p>	HIGH
N5	<p><b>Applications overview for the user</b></p> <p><u>Business description of the current situation</u></p> <p>Current solution does not provide this functionality.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will offer the applicants an overview of the applications they have submitted, including their respective statuses.</p>	MEDIUM
N6	<p><b>Consultations overview for third parties</b></p> <p><u>Business description of the current situation</u></p> <p>Current solution does not provide this functionality.</p> <p><u>Business description of the proposed solution</u></p>	LOW

	The proposed solution will allow third parties to have an overview of the cases on which they have been consulted.	
N7	<p><b>Data protection</b></p> <p><u>Business description of the current situation</u></p> <p>Current solution does not meet data protection requirements. The current system has difficulties with implementing the principles of data minimisation and storage limitation.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will apply the data protection principles ('data protection by design and by default'). It shall allow the data subjects to exercise their rights (right to access their personal data, of erasure of personal data as long as a reply has not yet been issued).</p>	HIGH
N8	<p><b>Document management</b></p> <p><u>Business description of the current situation</u></p> <p>The case handler sends the fully disclosed documents following an application to access to documents only to the applicant who requested it. Such documents are 'flagged' in ARES and published in HERMES repository but are not available to the public.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will allow the applicant to receive the fully or partially disclosed document directly via the platform; it will also make the disclosed documents available to all citizens.</p>	MEDIUM
N9	<p><b>Communication via platform</b></p> <p><u>Business description of the current situation</u></p> <p>The current IT system relies on case handlers manually uploading incoming and outgoing communication in the system.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will allow all stakeholders to exchange formal communication via the platform. The communication will be subsequently stored for e.g. search.</p>	HIGH
N10	<p><b>Alternative means of communication</b></p> <p><u>Business description of the current situation</u></p> <p>The current approach involves predominantly communication via alternative means (e.g. email or post). The case handlers subsequently manually encode the data into the system.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will generate all formal communication between the Commission, applicant and the third parties. It will also provide automatic notifications mechanism and allow the manual encoding of the alternative means of communication (e.g. emails and documents).</p>	HIGH
N11	<p><b>Use native language in communication</b></p> <p><u>Business description of the current situation</u></p> <p>The current IT system does not support automatic translation. The translation of the replies to the applicant and consultation letters to</p>	LOW

	<p>the third parties employs the 'Poetry' tool.</p> <p>Translated templates in the 23 EU languages complement the need to communicate in the applicant's native language.</p> <p><u>Business description of the proposed solution</u></p> <p>The new solution will allow the automatic translation (for example in order to assess the scope of the new application). It will also integrate with the 'Poetry' tool, which will enable translation requests from the Directorate-General for Translation.</p>	
N12	<p><b>Automatize and standardize correspondence</b></p> <p><u>Business description of the current situation</u></p> <p>The current solution makes heavy use of email communication between parties.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed IT solution will support all formal communication between the Commission, applicants and the third parties. The system will handle such correspondence (e.g. notifications, holding replies etc.) by integrating the standardized templates available in all 23 EU official languages.</p>	HIGH
N13	<p><b>Log user acknowledgement of reply</b></p> <p><u>Business description of the current situation</u></p> <p>The current solution records the applicant's acknowledgement of receipt of the reply for the initial application<sup>5</sup>. The case handler uses the timestamp in assessing the admissibility of the confirmatory application.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will improve and integrate this workflow. It will automate the relevant assessment components. It will also provide feedback from the user on data access.</p>	HIGH
N14	<p><b>Secure documents exchange</b></p> <p><u>Business description of the current situation</u></p> <p>Stakeholders exchange documents relevant to applications for access to documents via e-mail and post.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will implement electronic secure document exchange using existing building blocks.</p>	HIGH
N15	<p><b>Handling applications</b></p> <p><u>Business description of the current situation</u></p> <p>The platform stores all relevant data for an application. Confirmatory applications preserve the identifier of the initial application.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will replicate the functionality. In addition, it will</p>	HIGH

<sup>5</sup> The case handler uploads the acknowledgement of receipt in a specific section in ARES.

	provide a workflow to facilitate the transition between tasks. The tool will provide to the relevant Commission staff a visual representation of an application's current state.	
N16	<p><b>Support split cases</b></p> <p><u>Business description of the current situation</u></p> <p>When the case concerns two or more Commission services, the request is split among different Commission services, each request receiving a new identifier.</p> <p>Most cases have a service nominated as 'lead' service. It ensures the consistency in the replies prepared by the Commission services. Such exchange of communication is handled via e-mails. The Commission's Secretariat General informs the applicant about the split via e-mail.</p> <p><u>Business description of the proposed solution</u></p> <p>The new IT tool will provide the same functionality to support splitting cases.</p>	HIGH
N17	<p><b>Use the same file for initial and confirmatory applications</b></p> <p><u>Business description of the current situation</u></p> <p>The current IT system uses the same identifier for both initial and confirmatory applications as well as the same file (storing all the relevant data).</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will offer the same functionality.</p>	HIGH
N18	<p><b>Handle partially disclosed documents</b></p> <p><u>Business description of the current situation</u></p> <p>The case handler redacts the documents in a separate software. They send such partially disclosed documents to the applicant and upload them in the system.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will extend the current functionality. It will allow the case handler to associate the redacted part of the document with the relevant exception and use this information when communicating with the applicant.</p>	LOW
N19	<p><b>Statistics and reporting</b></p> <p><u>Business description of the current situation</u></p> <p>The current approach involves manual, on-demand generation of statistics and reports.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will be able to generate different types of statistics (e.g. annual reports, per-task metrics) and be sufficiently flexible to allow for the generation of the new types of statistics (e.g. Data as a Service).</p>	HIGH
N20	<p><b>Identify entities</b></p> <p><u>Business description of the current situation</u></p> <p>Case handlers manually identify entities like third parties and</p>	LOW

	<p>applicants. The process is time consuming.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will identify different entities and improve the processing time and quality of an application.</p>	
N21	<p><b>Register, assign and reassign requests</b></p> <p><u>Business description of the current situation</u></p> <p>The Commission registers the requests (which can be submitted via different channels), sends the acknowledgment of receipt to the applicant and assigns them to the relevant service, unless they have already been assigned by the applicant.</p> <p>A service can reassign to another service in case of erroneous assignment. This process may occur multiple times. Secretariat-General is informed (added to carbon copy recipients of such e-mail exchanges).</p> <p><u>Business description of the proposed situation</u></p> <p>The proposed solution will replicate this solution (however, since most requests will be submitted via online platform, it will not be necessary to register them manually).</p> <p>In case of re-assignment, the system will keep the history logs of the reassignments.</p>	HIGH
N22	<p><b>Audit trail</b></p> <p><u>Business description of the current solution</u></p> <p>While the existing solution does provide limited support for tracking user actions, it does not implement any feature to know the status of a request at a specific past date.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will allow to know what action has been executed by which actor and when and to know the status of a request at a specific moment in the past.</p>	MEDIUM
N23	<p><b>Phase-out of the current GestDem application</b></p> <p><u>Business description of the current solution</u></p> <p>Not applicable.</p> <p><u>Business description of the proposed solution</u></p> <p>All data within the existing GestDem application will be migrated to EASE so that it can remain accessible to all relevant stakeholders. This full data migration will allow for an immediate substitution of the existing GestDem application by EASE, without the need of a transition period of coexistence of both applications. It will also improve its search capabilities.</p>	HIGH
N24	<p><b>Manage user roles and rights</b></p> <p><u>Business description of the current solution</u></p> <p>The existing GestDem application does offer the possibility to manage users. The system owner manages the access and roles to the application.</p> <p><u>Business description of the proposed solution</u></p>	HIGH

	EASE will allow Directorates-General and third parties to manage their own users of the application by giving / revoking access and adding / removing roles. Additionally, EASE will allow the Directorates-General to update their users in the application when a user moves from one Directorate-General to another.	
N25	<p><b>Support joint replies</b></p> <p><u>Business description of the current solution</u></p> <p>The existing GestDem application does offer the possibility to manage joint replies.</p> <p><u>Business description of the proposed solution</u></p> <p>EASE will allow case handlers and administrative coordinators to prepare joint replies and correspondence for multiple requests.</p>	HIGH
N26	<p><b>Manage templates</b></p> <p><u>Business description of the current solution</u></p> <p>While the existing solution does provide limited support for managing lists within the system, it is not possible to manage the templates that will be used by the case handlers to send out correspondence.</p> <p><u>Business description of the proposed solution</u></p> <p>The proposed solution will allow corporate coordinators to manage the templates used by local/corporate coordinators and case handlers to correspond with the applicants, third parties and Member States.</p>	MEDIUM

### 3.4 Deliverables

ID	Deliverable Name	Deliverable Description
D1	Project Management	This deliverable refers to the activities needed to manage the project, i.e. documentation and maintenance of the project management artefacts, planning of project management meetings and monitoring and control activities related to change, quality, deliverables acceptance, risk and issue management.
D2	Requirements specification	The detailed analysis will confirm the scope, concerned stakeholders and quantify benefits and costs.
D3	Security plan	This deliverable identifies the security and the business continuity requirements (including the detailed data protection ones).
D4.1	System Analysis V1	Analysis of V1 of EASE – focus on the Commission management of an initial application, excluding the communication with applicants.
D4.2	System Analysis V2	Analysis of V2 of EASE – focus on the Commission management of a confirmatory application, excluding the communication with applicants.
D4.3	System Analysis V3	Analysis of the V3 of EASE – focus on the data migration from GestDem to EASE.
D4.4	System Analysis V4	Analysis of V4 of EASE – focus on the applicant's submission and monitoring of an initial application, including the communication with the Commission.
D4.5	System Analysis V5	Analysis of V5 of EASE – focus on the applicant's submission and monitoring of a confirmatory application, including the communication with the Commission.
D4.6	System Analysis V6	Analysis of V6 of EASE – focus on the communication between the Commission and the third parties.
D4.7	System Analysis V7	Analysis V7 of EASE – focus on integration with the corporate decision-making platform Decide
D5	System architecture	The system architecture of EASE, taking into account the corporate restrictions, possibilities and best-practices.
D6.1	Technical proof of concept V1	Vertical slice of the <u>management application</u> containing all foreseen components and reusable building blocks to make sure that this component of the application is technically sound.
D6.2	Technical proof of concept V2	Vertical slice of the <u>portal</u> containing all foreseen components and reusable building blocks to make sure that this component of the application is technically sound.

D7	Testing and acceptance plan	<p>Test plans and scenarios for the functional work-packages of each planned release will be defined within the scope of this deliverable. Description of the testing activities, testing approach and acceptance criteria.</p> <p>This deliverable will be constructed iteratively, as software releases become available.</p>
D8	Business implementation	<p>This deliverable refers to the activities needed to ensure a proper transition and the successful adoption of the project's deliverables. This includes but is not limited to:</p> <ul style="list-style-type: none"> <li>• Communication and promotion</li> <li>• End-user documentation</li> <li>• Business continuity</li> <li>• Benefits tracking</li> <li>• Stakeholder engagement</li> <li>• Support and training</li> </ul>
D9.1	[V1] First EASE release	The first release of EASE covers the features in scope of D4.1 – System Analysis V1
D9.2	[V2] Second EASE release	This release of EASE covers the features in scope of D4.2 – System Analysis V2
D9.3	[V3] Third EASE release	This release covers the features in scope for D4.3 – System Analysis V3
D9.4	[V4] Fourth EASE release	This release of EASE covers the features in scope of D4.4 – System Analysis V4
D9.5	[V5] Fifth EASE release	This release of EASE covers the features in scope of D4.5 – System Analysis V5
D9.6	[V6] Sixth EASE release	This release of EASE covers the features in scope of D4.6 – System Analysis V6
D9.7	[V7] Final EASE release	This release of EASE covers the features in scope of D.4.7 – System Analysis V7
D10	Data migration	Migrate all data currently managed by the existing GestDem application, to ensure its complete phasing out.
D11	User training and communication activities	Training activities for Commission services' users and communication actions for citizens and third parties
D12	Lessons learned	Description of the lessons learned by the project closure and before the start of the maintenance.

### 3.5 Features

Related Need	ID	Features	Deliverable(s)
N2, N9, N11, N12, N13, N15, N16, N21	F1	<p>Communication</p> <ul style="list-style-type: none"> <li>• Perform all official communication via the platform</li> <li>• Automatically send the request for</li> </ul>	D9.1, D9.2, D9.3, D9.4, D9.5, D9.6

		<p>contribution to the relevant Directorate General (for confirmatory applications only)</p> <ul style="list-style-type: none"> <li>• Consult the relevant Directorate-General (who dealt with the application at the initial stage) and the Legal Service in the context of a draft confirmatory decision (for confirmatory applications only)</li> <li>• Integrate communication templates</li> <li>• Allow automatic input of text/data relevant for the specific case</li> </ul>	
N9, N11, N12, N16	F2	<p>Translation</p> <ul style="list-style-type: none"> <li>• Provide communication templates in all languages</li> <li>• Provide automatic translation of text (e.g. in order to assess the scope of the application)</li> <li>• Manage translation requests (e.g. documents, correspondence) to Directorate-General for Translation</li> </ul>	D9.1, D9.2
N5, N6, N10, N12, N14, N15, N16	F3	<p>Dashboards</p> <ul style="list-style-type: none"> <li>• Provide an overview of applications for the applicant and display the status of the ongoing ones (including information about the split cases)</li> <li>• Provide third parties with an overview of consultations, including the status for each one of them, as well as the documents on which they have been consulted</li> </ul>	D9.3, D9.4, D9.5
N2, N8, N9, N11, N12, N21	F4	<p>Notifications</p> <ul style="list-style-type: none"> <li>• Manage automatic feedback to applicant</li> <li>• Manage reminders, alerts, notifications to the applicants, and third parties (e.g. in case of approaching deadlines, reattribution of cases etc.)</li> <li>• Manage the change of deadline (e.g. deadline stops running while clarification from the user is pending)</li> </ul>	D9.1, D9.2, D9.4, D9.5, D9.6
N2, N3, N4, N5, N6, N7, N8, N9, N10, N11, N12, N13, N14, N15, N18, N19, N20, N21, N22, N23, N24	F5	<p>Data management</p> <ul style="list-style-type: none"> <li>• Data protection by design and by default</li> </ul>	D9.1, D9.2, D9.3, D9.4, D9.5, D9.6, D10
N2, N7, N8, N14, N18, N22, N23	F6	<p>Document management</p> <ul style="list-style-type: none"> <li>• Manage document publication</li> <li>• Transfer to historical archives</li> </ul>	D9.1, D9.2, D9.3

N2, N4, N10, N15, N17, N21, N22, N23, N24, N25	F7	<p>Application handling</p> <ul style="list-style-type: none"> <li>• Workflow for application processing</li> <li>• Visual indication showing the progress for each request</li> <li>• Integrate with relevant Commission decision making tools (e.g. Decide)</li> <li>• Integrate with ARES and other HAN compliant tools</li> <li>• Manage document redaction</li> <li>• Identify documents annexed to a Commission reply sent to the applicant (e.g. possibility to indicate what is 'Document 1', 'Document 2' mentioned in the text of the Commission reply)</li> </ul>	D9.1, D9.2, D9.3
N1, N2, N10, N24	F8	<p>Help</p> <ul style="list-style-type: none"> <li>• Provide a step-by-step guidance to the applicant when submitting a request</li> <li>• Provide guidance to third parties when consulted</li> <li>• Provide user documentation</li> <li>• Provide tool documentation (e.g. integration documentation for shareable components)</li> </ul>	D9.1, D9.2, D9.4, D9.5, D9.6
N19, N22	F9	<p>Reporting and statistics</p> <ul style="list-style-type: none"> <li>• Log workflow, consultation and edition actions in an audit trail</li> <li>• Search through and consult the audit trail</li> <li>• Provide workflow statistics (how many cases are at which deadline)</li> <li>• Provide various types of statistics (number and type of documents disclosed, exception invoked for refusing the access etc.)</li> <li>• Provide 'data as a service' for flexible reporting</li> </ul>	D9.1, D9.2, D9.3
N1, N7, N9, N10, N14, N15, N20, N22, N23	F10	<p>Search and suggestions</p> <ul style="list-style-type: none"> <li>• Automatically identify entities and personal data in text</li> <li>• Identify documents from different data sources (e.g. registries, Corporate Search and Hermes/Ares/NomCom)</li> <li>• Indicate to the case handler if a third party has already been consulted as regards disclosure of the document identified</li> <li>• Indicate if there is an ongoing Ombudsman case or Court of Justice proceedings relevant</li> </ul>	D9.1, D9.2, D9.3, D9.4, D9.5, D9.6, D10

		for the application /document <ul style="list-style-type: none"> <li>• Search and/or suggest similar applications, applicants, Commission replies/ decisions, documents disclosed, relevant case-law</li> </ul>	
N3, N4, N5, N6, N09, N10, N12, N13, N18, N23, N24	F11	Identity and access management <ul style="list-style-type: none"> <li>• Manage user creation for applicants, third parties and Commission users</li> <li>• Manage contact points for third parties</li> <li>• Identify users</li> </ul>	D9.1, D9.2, D9.3, D9.4, D9.5
N26	F12	Template management	D9.1, D9.2, D9.3, D9.4, D9.5

### 3.6 Constraints

The project is subject to the following constraints:

Time and budget

- Delivery date in Q1 2021. The current IT system used for handling the applications for access to documents is based on a phased-out technology (ColdFusion) which will no longer be supported by the Commission IT landscape as from April 2021.
- The total cost of ownership, for the period spanning from 2019 until 2020, cannot exceed the amount of 1450 k€.

Business

- Business processes must continue uninterrupted.
- The system must be designed with data protection as a core feature.

Integration with corporate systems

- The solution must integrate with a number of corporate building blocks and systems [10] (e.g. EU Login, EU Access, EU Send, Compass Corporate, Ares/Hermes, DORIS). These integrations impose additional constraints, which need to be taken on board and tackled as part of the project.

Use of standards

- The solution will be built using standard technologies (in line with the recommendations provided by DIGIT and DG COMM for EUROPA).

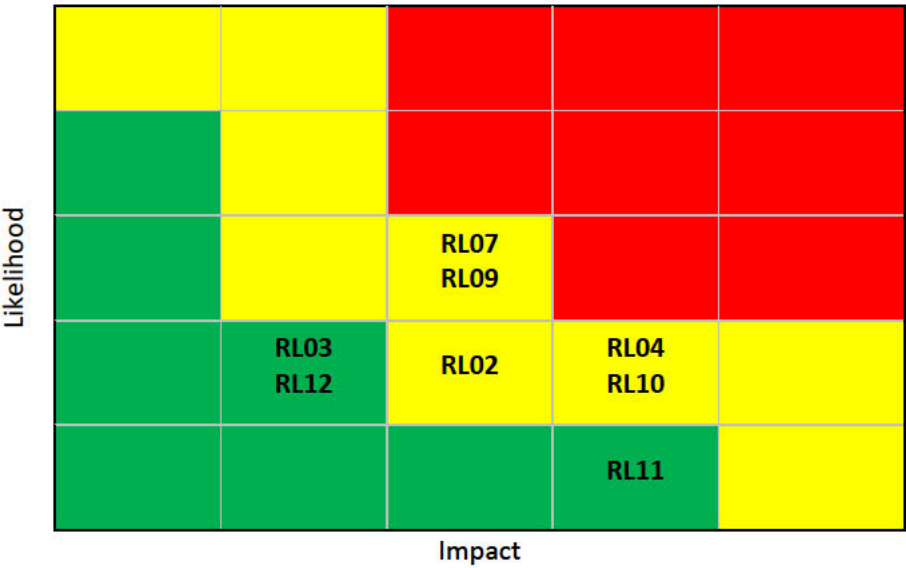
### 3.7 Assumptions

The project formulates the following assumptions:

- The project will receive the appropriate financial and human resources.
- All project stakeholders will be involved in the project when required.
- Users of the envisaged solution will support the definition of requirements and will provide feedback via testing activities (the User Taskforce was already created for this purpose).

- In terms of supported languages, EASE management system Graphical User Interface will support both French and English. For the Graphical User Interface of the external Portal all 23 official languages will be supported.

3.8 Risk Register



ID	Risk Description & Details	Status	Likelihood <sup>6</sup>	Impact <sup>7</sup>	Risk Level <sup>8</sup>	Risk Owner	Risk Response Strategy <sup>9</sup>	Action Details
RL01	<b>Lack of management commitment and support</b> Non-alignment and poor response to the evolving needs of the business	Closed	1	3	3	PO & SP	Reduce	<ul style="list-style-type: none"> <li>Get the endorsement of the Steering Committee</li> <li>Organise regular Steering Committee Meetings</li> <li>Clearly define roles and responsibilities</li> <li>Communicate on a regular basis</li> </ul>
RL02	<b>Insufficient time</b> to develop the minimum viable product	Approved	2	3	6	SP	Avoid	<ul style="list-style-type: none"> <li>Set up incremental functionality delivery and provide alternative paths to cover for the missing functionality</li> <li>Review the scope to reduce the number of initially available features to ensure a timely delivery</li> <li>Negotiate the deadline for delivering the minimum viable product</li> </ul>
RL03	Difficulties in implementing <b>data protection by design</b>	Approved	2	2	4	SP	Reduce	<ul style="list-style-type: none"> <li>Involve the Data Protection Officer in the data architecture</li> <li>Review synergies with Building Blocks and Corporate solutions based on the data protection principles</li> </ul>
RL04	<b>Lack of user acceptance</b> Incomplete and inconsistent use of the system, continuous complaints on functional and non-functional features and projection of organisational shortcomings onto the system	Approved	2	4	8	SP	Reduce	<ul style="list-style-type: none"> <li>Provide training material and organise workshops to demo the application, as intermediate releases are available</li> <li>Provide migration support for GestDem users</li> <li>Get an in-depth understanding of how the system will be used, the rationale behind it and the way in which the proposed solution will effectively help the users affected</li> <li>Pay particular attention to usability and performance</li> <li>Involve user representatives in all phases of the project</li> </ul>
RL05	<b>Incorrect system requirements</b>	Closed	3	5	15	BM & PM	Reduce	<ul style="list-style-type: none"> <li>Follow a user centric approach, describing user stories from</li> </ul>

<sup>6</sup> A numeric value denoting the relative probability that the risk should occur.

<sup>7</sup> A numeric value denoting the relative severity of the impact of the risk if it should occur.

<sup>8</sup> The risk level is the product of the likelihood and impact (RL=L\*I).

<sup>9</sup> The possible risk response strategies are: Avoid/ Transfer or Share/ Reduce / Accept.

ID	Risk Description & Details	Status	Likelihood <sup>6</sup>	Impact <sup>7</sup>	Risk Level <sup>8</sup>	Risk Owner	Risk Response Strategy <sup>9</sup>	Action Details
	Re-factoring on already implemented features leading to additional costs and delays in the project							<p>the point of view of the user performing the action on the system</p> <ul style="list-style-type: none"> <li>Continuous involvement of business in the drafting and validation of specifications</li> <li>Preparation of screen mock-ups for each user story to reflect how the system will behave</li> </ul>
RL06	<b>Training offer not delivered on time</b> Users' errors using the application leading to an increased volume of support requests	Closed	1	3	3	PO & SP	Avoid	<ul style="list-style-type: none"> <li>Involve the training / support team during the whole lifecycle of the project</li> <li>Tailor training offer to all user target groups. Set a different set of priorities and needs for each target group independently</li> <li>Integrate relevant information into new releases to cater for existing users</li> <li>Design intuitive interfaces for users based on best practices. Make use of e.g. wizards, on-boarding techniques to minimise the impact</li> </ul>
RL07	<b>Complexity of data migration</b> Reduced functionality	Approved	3	3	9	SP & PM	Reduce	<ul style="list-style-type: none"> <li>Start analysis on the data migration early within the project.</li> <li>Build a prototype to perform data migration and progressively improve it by running migration exercises and checking data quality</li> <li>Implement data migration in phases to maximize its benefits (search)</li> </ul>
RL08	<b>Lack of Compass Corporate endorsement</b>	Closed	2	3	6	SP	Reduce	<ul style="list-style-type: none"> <li>Participate in Compass Corporate training sessions in the early stages of the project</li> <li>Establish small proof-of-concept implementations to validate the technical stack and enablers</li> <li>Request dedicated support channels for the development team</li> </ul>
RL09	<b>Multiple service suppliers</b>	Approved	3	3	9	SP	Reduce	<ul style="list-style-type: none"> <li>Establish a communication plan</li> <li>Apply change management procedures</li> </ul>

ID	Risk Description & Details	Status	Likelihood <sup>6</sup>	Impact <sup>7</sup>	Risk Level <sup>8</sup>	Risk Owner	Risk Response Strategy <sup>9</sup>	Action Details
								<ul style="list-style-type: none"> <li>Follow up closely the project progress and milestones</li> <li>Establish a hand-over plan</li> </ul>
RL10	<b>Integration with other systems</b>	Approved	2	4	8	SP	Reduce	<ul style="list-style-type: none"> <li>Establish a business continuity plan for EASE system</li> <li>Assess the IT Service Continuity plans for the systems to be integrated</li> <li>Establish service level agreements for each of the systems to be integrated.</li> </ul>
RL11	<b>Lack of stakeholder availability</b>	Approved	1	4	4	PO	Reduce	<ul style="list-style-type: none"> <li>Ensure that the stakeholders and their roles are identified correctly</li> <li>Ensure the dedication of the stakeholders to the project</li> <li>Agree on the planning of the business analysis and the commitments required from the stakeholders.</li> <li>Agree on a stakeholder communication plan.</li> <li>Ensure the collaboration between stakeholders.</li> <li>Ensure that the commitments are maintained.</li> </ul>
RL12	<b>Changes in requirements late into the project</b>	Approved	2	2	4	PO & BM	Reduce	<ul style="list-style-type: none"> <li>Asses the proposed change if it will increase the value of the solution</li> <li>Define the action(s) to be taken</li> <li>Define the impacts on the planning and the required resources</li> <li>Get the approval of the Business</li> <li>Prioritise the change request</li> </ul>

Note: The [project's wiki](#) [12] contains the most up-to-date Risk Log.

## **4 COST, TIMING AND RESOURCES**

### **4.1 Cost**

The total budget for the EASE project for the period of five years from 2019 to 2023 is estimated to 1800 k€.

During the July 2019 Project Steering Committee meeting, the System Owner decided to allocate 100 k€ from the GestDem development budget to EASE to deal with archiving and migration aspects within the scope of the EASE project.

	2019		2020		2021		2022		2023		
Expenditure	Budget Line	Amount <sup>10</sup>	Budget Line	Amount	Budget Line	Amount	Budget Line	Amount	Budget Line	Amount	Total cost
Solution Development <sup>11</sup> (k€)	Registers & Publications 25.01.11.00	200	Registers & Publications 25.01.11.00	100	Information Systems 20.04.01.00	100	Information Systems 20.04.01.00	100			1650
	ISA2 26.03.01.01	600	ISA2 26.03.01.01	550							
Solution Maintenance <sup>12</sup> (k€)					Information Systems 20.04.01.00	50	Information Systems 20.04.01.00	50	Information Systems 20.04.01.00	50	150
<b>Total per year (k€)</b>		800		650		150		150		50	1800
<b>Total per year FTE officials<sup>13</sup></b>		1.52		1.45		0.46		0.1		0.1	3.63

<sup>10</sup> If you cannot provide an amount, provide at least a qualitative statement (e.g. 20 days of training, 2 laptops, etc.)

<sup>11</sup> Development: provide the total (anticipated) cost (human resources) for the development of the solution

<sup>12</sup> Maintenance: provide the total (anticipated) cost (human resources) in k€ per year to maintain the solution

<sup>13</sup> Total FTE officials: provide the total (anticipated) effort that will be spent by Commission officials on the project (in man-weeks, man-months or man-years).

## 4.2 Timing and Milestones

Table below is merely indicative, subject to change during the Planning Phase. It does reflect, however, the activities, deliverables and approach that the project will take.

ID	Milestone Description	Deliverables	Target Delivery Date
M1	Requirements specified and validated	D1, D2	06/2019
M2	System architecture designed	D5, D7	07/2019
M3	Proof-of-concept prototype, validating the system architecture and technology chosen	D6.1, D6.2	10/2019
M4	[V1] Functional and technical specifications validated	D4.1	09/2019
M5	[V1] System developed, tested and validated by all relevant stakeholders	D9.1, D7	04/2020
M6	[V2] Functional and technical specifications validated	D4.2	02/2020
M7	Security study	D3	06/2020
M8	[V2] System developed, tested and validated by all relevant stakeholders	D9.2, D7	09/2020
M9	[V3] Data migration analysis	D4.3	04/2020
M10	[V3] Data migration dev, test, validation	D9.3, D7	09/2020
M11	[V4] Functional and technical specifications validated	D4.4	07/2020
M12	[V4] System developed, tested and validated by all relevant stakeholders	D9.4, D7	11/2020
M13	[V5] Functional and technical specifications validated	D4.5	07/2020
M14	[V5] System developed, tested and validated by all relevant stakeholders	D9.5, D7	11/2020
M15	[V6] Functional and technical specifications validated	D4.6	05/2021
M16	[V6] System developed, tested and validated by all relevant stakeholders	D9.6, D7	10/2021
M17	[V7] Functional and technical specifications validated	D4.7	05/2022
M18	[V7] System developed, tested and validated by all relevant stakeholders	D9.7, D7	10/2022
M19	Data migration	D10	09/2020

ID	Milestone Description	Deliverables	Target Delivery Date
M20	Training and communication activities	D11	11/2020
M21	Lessons learned	D12	01/2021

#### 4.3 Planned Resources

ID	Resource	Requirement	Description
PM	Project Manager (SG.C.5)	1	Project Manager of the project, with the necessary skills to execute an IT project and already familiar with the PM2 and Agile@EC methodologies.
BM	Business Manager (SG.C.1)	1	The equivalent of the Project Manager from the Project Owner's side. This resource will be in charge of the business implementation, training, communication and the relation with case coordinators and handlers across the Commission services.
BA	Business Analyst (SG.C.5)	2	Intramuros consultants hired via a framework contract (to be defined) to draft the high level and detailed analysis of the solution, based on the requirements defined.
ARC	Architect (SG.C.5)	1	Intramuros consultants hired via a framework contract (to be defined) to define the technical design of the application.
DEV	Developers (SG.C.5)	8	Intramuros consultants hired via a framework contract (to be defined) to implement the application.  Knowledge of the following technologies is required: <ul style="list-style-type: none"> <li>• Back-end: Java, Oracle DB &amp; Spring</li> <li>• Front-end: Javascript, Angular &amp; eUI</li> </ul>
UID	User Interface Designer (SG.C.5)	1	Intramuros consultants hired via a framework contract (to be defined) , partially involved during the whole lifecycle of the project, in charge of defining user-friendly interfaces and interaction patterns, based upon the requirements and analysis of the solution.

ID	Resource	Requirement	Description
TST	Tester (SG.C.5)	1	Intramuros consultants hired via a framework contract (to be defined) to test the application and develop the test plans and scenarios.
TRA	Trainer (SG.C.3)	1	Intramuros consultant who prepares the required training material.
UR	User Representatives (EC services) <ul style="list-style-type: none"> <li>• Case coordinators</li> <li>• Case handlers</li> </ul>	5-10 Coordinators and Handlers across the EC services	The user representatives will support in the requirements definition and testing activities.

## 5 APPROACH

### 5.1 Methodology

This project will adopt PM<sup>2</sup> and Agile@EC as its project management and delivery methodologies.

In addition, the project will employ the approach of user-driven processes by involving end-users from the very beginning and at every step (e.g. through user experience research and user testing). This will ensure that the final product fulfils their needs.

### 5.2 Change Management

#### 5.2.1 Project Change

Project change management aims to bring transparency, accountability and traceability to all project improvements and modifications implemented during the project life cycle. It ensures that the appropriate level of authority properly assesses, agrees upon and approves changes with a significant impact in any of the dimensions (i.e. scope, time, cost, quality or risk).

A project change can result from a change in scope, a new requirement, an improved quality, a newly identified issue, a preventive action to reduce the risk level, or from a decision taken to change any of project baselines (scheduling, staffing or budget). The agile organisation will allow for maximum flexibility and scalability, in order to maximise the system's value.

The project will follow the PM2 approach for change management, illustrated in Figure 1 below:

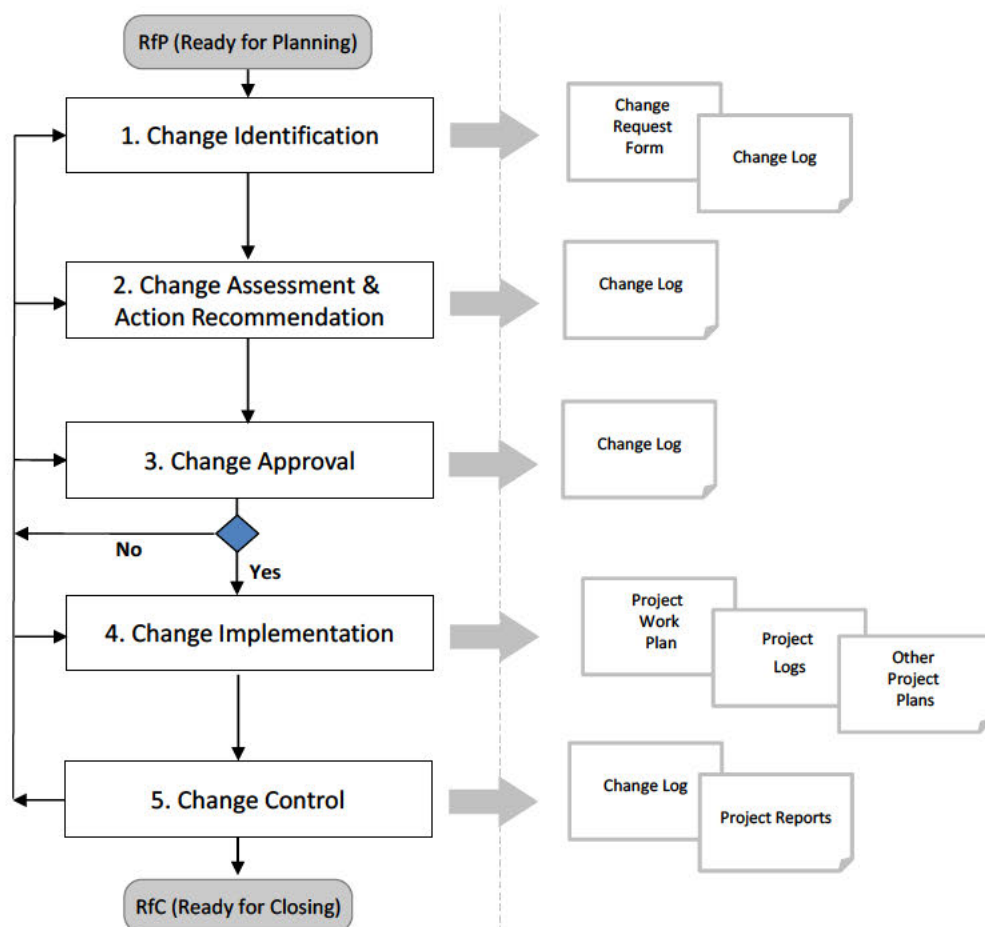


Figure 1: Change management process

Depending on the origin and nature of the change request the Project Core Team (PCT) or the Business Implementation Group (BIG) will be involved in the pre-approval activities.

### 5.2.2 Configuration Management

Project documentation will be stored in the My IntraComm collaborative site dedicated to the EASE project and on the Confluence wiki site based on the unit's document management policy guidelines.

The project will host its source code on a distributed version control system (VCS) on DIGIT's CITnet infrastructure.

Deployment artefacts will be built via continuous integration and deployment plans configured on DIGIT's CITnet platform.

### 5.2.3 Organisational Change

The Business Manager will document organisational change(s) in the Business Implementation Plan.

The Business Implementation Group (BIG) will meet on a regular basis to keep track of the business implementation actions related to organisational change. The BIG will also track the project work plan activities and tasks, which fall into the following categories:

- Communication and promotion,
- End-user documentation,
- Business continuity,
- Benefits tracking,
- Stakeholder engagement and
- Support and training.

## 6 GOVERNANCE AND STAKEHOLDERS

### 6.1 Structure

The project will follow the standard PM2 Project Governance structure, as illustrated in Figure 2 below:

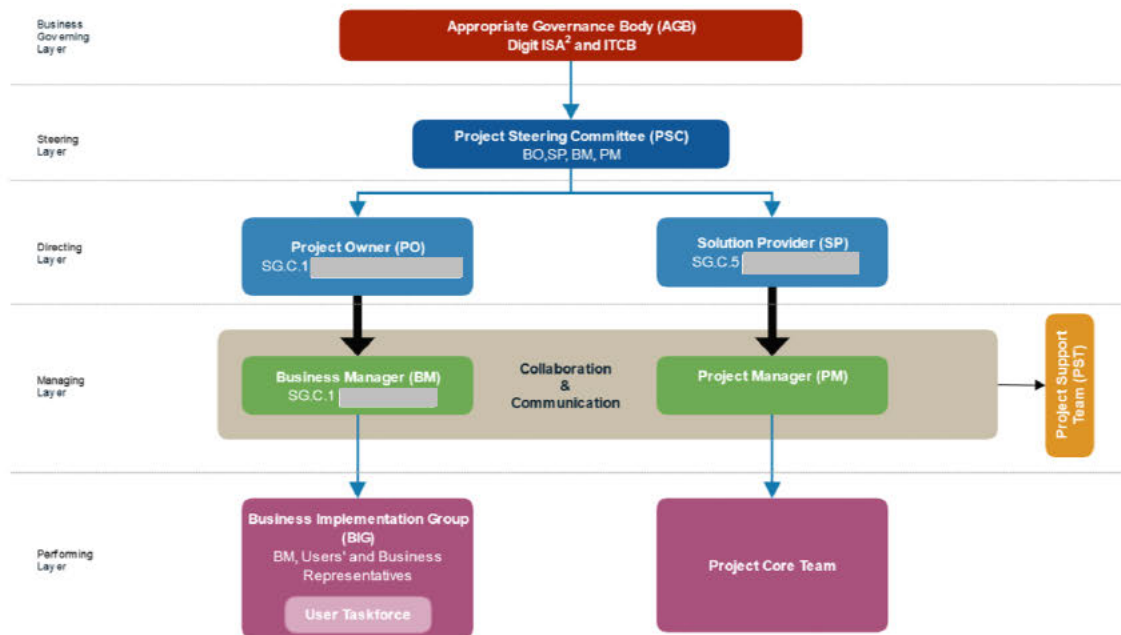


Figure 2: Project governance

The Project Steering Committee is composed of the following members:



Role	Name
Project Owner	SG.C.1 - Transparency, Document Management & Access to Documents [Redacted], [Redacted]
Solution Provider	SG.C.5 - Digital Solutions & Process Efficiency [Redacted] - [Redacted] [Redacted] - [Redacted] [Redacted] - [Redacted]
Business Manager	[Redacted] (SG.C.1)
Project Manager	[Redacted] (SG.C.5)

### 6.2 Roles and Responsibilities

There are no deviations from the standard PM2 Roles and Responsibilities.

### 6.3 Other Stakeholders

Role	Name
User Representatives	This group will be composed of Coordinators and Case handlers from across EC services.
Data Protection Coordinator	[Redacted] (SG.C.1)

<b>GestDem Project Manager</b>	 (SG.C.5)
<b>Local Information Security Office (LISO)</b>	 (SG.C.5)

## APPENDIX 1: REFERENCES AND RELATED DOCUMENTS

ID	Reference or Related Document	Source or Link/Location
1	Project folder	<a href="#">Collaborative site</a>
2	Public access to documents Regulation EC N°1049/2001	<a href="#">EurLex</a>
3	General Data Protection Regulation EC N°2016/679	<a href="#">GDPR</a>
4	AS IS Business Process Analysis Report	<a href="#">Collaborative site</a>
5	TO BE Business Process Analysis Report	<a href="#">Collaborative site</a>
6	European Ombudsman decision in case 682/2014/JF on the European Commission's requirement that persons who ask for public access to documents provide their postal address	<a href="#">Ombudsman</a>
7	IT Board Operational conclusions of 18/10/2018	Ares(2018)5481745
8	European Commission on the initiative for a new IT system for managing applications to access documents and related correspondence	<a href="#">Collaborative site</a>
9	Note to the IRMs of the Directorates- General and Executive Agencies: ColdFusion 11 and next steps	Ares(2016)5120861
10	EASE – Business Case document	Ares(2019)727716
11	EASE – Wiki page	<a href="#">EASE - Confluence Wiki</a>
12	EASE – Logs page	<a href="#">EASE - Logs</a>
13	EC Digital Strategy	<a href="#">A Digital Strategy for a future-proof Commission (cached on the collaborative site)</a>