



Secretariat-General (SG)
Unit SG.C.1 – Transparency, Document Management and Access to Documents

Business Case

Electronic Access to European Commission Documents (EASE)

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1 PROJECT INITIATION REQUEST INFORMATION

Project Title:	Electronic Access to the European Commission Documents		
Initiator:		DG / Unit:	SG.C.1
Date of Request:	31/01/2019	Target Delivery Date:	Q4/2020
Type of Delivery:	<input type="checkbox"/> In-house <input type="checkbox"/> Outsourced <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Not-known		

2 CONTEXT

2.1 Situation Description and Urgency

The current landscape of tools supporting the submission and handling of applications to access to Commission documents under Regulation 1049/2001 is fragmented and outdated. There is very little automation as there are various channels for the submission of the applications, consultation of the Member States and third parties and communication with the applicants.

Moreover, the current system (GestDem) is cumbersome, not user-friendly enough and sustained by a technology (ColdFusion) which will no longer be supported by DIGIT after the end of 2020. Applicants have very limited possibilities to search and retrieve documents already partially or fully disclosed under Regulation 1049/2001 as such documents are not fully published. The applicants also do not have an overview or traceability of their requests while the Member States have no overview of the documents on which they have been consulted.

On the side of Commission services who are responsible for replying to initial applications for access, and the Secretariat-General, which is responsible for confirmatory applications¹, the current system does not provide an all-in-one case-management system. It does not provide an overview of the workflow or the generation of the relevant statistics about the respect of deadlines, the types of replies given and the types of documents released.

In order to analyse how to improve the business processes and the supporting IT tools for submitting and handling requests for public access to documents, a comprehensive study was conducted in 2018 in the context of the ISA² action 2018.05 'Electronic access to European Commission documents - Study'. The outcomes of the study are:

1. 'AS IS' analysis [4] - The project team analysed the IT tools and business processes currently in place ('AS IS') for handling applications for public access to documents, from the submission of the applicant's request up until the final answer of the Commission.
2. Stakeholder consultations [8] - A wide range of consultations was carried out in 2018 in order to gather the stakeholders' views and suggestions and assess the business needs for the future IT system.
3. 'TO BE' analysis [5] - Based on the results of the consultations, the 'TO BE' business process workflows were designed, covering both initial and confirmatory applications. The overall processes cover the attribution and assessment of the requests for documents, the third-party (including Member State) consultations, as well as the dispatch of the reply to the applicant.

Moreover, during the study, we have explored solutions to provide applicants, Member States, other EU institutions and third parties with a user-friendly interface to European Commission, and to enable Commission services to deal with these stakeholders in an efficient and coherent manner.

Volume of requests to be processed

Annually, the European Commission receives approximately 6000 initial applications and around 300 confirmatory applications to access to documents. Of these requests, about 77% come through the online form, 23% come through other means (e.g. paper, e-mail). The 'AS IS' analysis has revealed weaknesses of the current system: too

¹ In case of a partial or full refusal of the access to the documents at the initial stage, the applicant can file a confirmatory application in which the Secretariat-General conducts a fresh review of the case.

many manual processes; a lack of tools to ensure that citizens' applications are dealt with in a coherent and consistent manner.

Objective and urgency

The objective of the EASE (Electronic Access to European Commission Documents) project is to ensure the Commission will be equipped with modern, electronic and integrated IT tools allowing the submission and handling of the requests for public access to documents. The solution will cover the public interface for communicating with applicants, the internal workflows within the European Commission, and the consultations of other EU Institutions, Member States and third parties, from the first request of the applicant to the final decision of the Commission. The ultimate goal is to bring the EU decision-making process closer to its citizens.

The urgency of the project is also justified by the fact that the current tools supporting the public access to documents process are fragmented and are sustained by a technology (ColdFusion) which will no longer be supported by DIGIT as from 2021.

Moreover, the current system, based on delivery by registered mail or by an express courier service, has triggered criticism² by the European Ombudsman and civil society, who consider it cumbersome and not citizen-friendly enough. Therefore, the future 'access to documents' process needs to become more efficient and more user friendly for the citizen so as to make the EU decision-making process more transparent in line with the Juncker Commission priority of 'Democratic Change'.

The aim of the future IT system is to be generic, reusable by any transnational, national or subnational administration managing requests from the public for access to documents.

2.2 Situation Impact

2.2.1 Impact on Processes and the Organisation

The main objective of the project is to provide an information system that enables streamlining of the access to European Commission documents processes across the different stakeholders.

The future system will improve the workflows linked to the submission, processing and preparation of replies to requests for access to European Commission documents. It also aims to rationalise internal workflows and enhance consistency between replies.

2.2.1.1 Impacts on the organisation's strategy

The Commission services spend significant resources in processing requests to access to documents. The current IT configuration provides limited support. Obtaining statistics and Key Performance Indicators is difficult and incomplete due to the absence of any categorisation of documents requested and released.

The new IT system will enable the Commission services to have a better overview of the types of documents requested and released, and of the exceptions invoked. It will also ensure increased coherence in the access granted to the same or similar documents requested at different points in time, or by different Directorates-General or services.

The new system will also 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

² See decision in case 682/2014/JF

deletion at a later stage. It will thereby ensure compliance with the requirement, laid down by the new Data Protection Regulation 2018/1725, of 'data protection by design'³.

2.2.1.2 Impacts on the IT landscape

The current landscape of tools supporting the public access to documents in possession of the European Commission is fragmented and many exchanges are not electronic:

1. The European Commission provides, as part of the Register of Commission Documents ('RegDoc'), a web form allowing EU citizens and other beneficiaries to request access to the documents in possession of the European Commission.
2. The NGO Access Info Europe, established in Madrid in 2006, provides a separate/private website, AsktheEU, in which access to information and access to document requests forwarded by e-mail to the European Commission are published. This website uses the Alaveteli platform. Documents to which access is given under Regulation 1049/2001, requests and the answers to the requests are made public on that website. The main disadvantages are that:
 - a. the personal data contained in the communication between the European Commission and the applicant are published automatically, and
 - b. the system does not generate acknowledgments of receipt of the answers and the documents, which are critical to judge whether the confirmatory application was submitted within the legal deadlines.
3. Today, applicants have no electronic means at their disposal to file confirmatory applications ('appeals' when an initial application is rejected or partially rejected).
4. Whereas consultations concerning documents originating from other institutions are conducted via e-mail only, consultations of Member States and third-parties are not fully electronic:
 - a. Consultations concerning documents originating from third parties are conducted via registered mail / express courier delivery (an informal copy is provided by e-mail);
 - b. Consultations concerning documents originating from Member States are delivered by hand and by e-mail.
5. All written exchanges with applicants, Member States, third parties and other EU institutions are manually encoded afterwards in a different information system, which is called GestDem.
6. All (partially) negative initial replies are delivered by registered mail and by e-mail and all confirmatory decisions are notified to applicants via DHL by the Secretariat-General and by e-mail.
7. Notification/Consultation via registered mail or express courier delivery is required in order to ensure the traceability of communication with the applicants, third parties and Member States.
8. The Commission extracts statistics from GestDem, but these are incomplete, as the system does not allow for a systematic encoding of the types of documents requested, their subject matter, and the type of access granted. As a result, the Commission does not have an overview of the types of documents to which access is most often requested and the type of access that is generally granted to specific types of documents.

³ The Commission's Data protection Officer has proposed using the new system of a best practice example in this respect.

9. Because of the limited document categorisation and identification functionalities in Ares/GestDem, it can happen that access to a document partially released in the past is fully refused at a later stage, with negative consequences for the coherence of the Commission's policy, its image and its position in legal proceedings.
10. Units dealing with the treatment of initial and confirmatory applications for access to documents have in some cases set up tailor-made delay monitoring systems. There is no central overview of the respect of the deadlines under Regulation 1049/2001 at initial and confirmatory level and the time taken for the successive steps in the process;
11. If applicants asking for their personal data processed in the framework of the treatment of an application for access to documents, the Commission has to search for these data in various systems (email boxes, Ares/GestDem);
12. Templates and guidance on the use of the various exceptions and the Commission's administrative practice in this respect are available on MyIntracomm;
13. There is no corporate tool available to search previous decisions and documents released according to words appearing in the text;
14. Adobe Acrobat Professional is currently used in order to redact selected parts of text falling under one or several exceptions of Regulation 1049/2001;
15. The Commission's electronic translation tools, developed by the Directorate-General for Translation, are used case-by-case in order to understand the scope of applications submitted in a language other than the languages mastered by the unit.

This project aims to eliminate this fragmentation and implement a fully electronic, holistic solution for:

- filing initial and confirmatory applications;
- communicating with applicants throughout the application process;
- consulting Member States, other EU institutions and third-parties;
- replying to requests;
- making documents released under Regulation 1049/2001 available to the wider public;
- Identifying documents fully or partially released under Regulation 1049/2001 and classifying them according to the document type and policy area concerned (e.g. 'briefing' related to 'infringements');
- Identifying, extracting and deleting (after expiry of the retention period) personal data processed when handling applications for access.
- a corporate delay monitoring system enabling to monitor the respect of the deadlines under Regulation 1049/2001;
- integrating reply templates into the system for handling applications;
- facilitating full-text search of previous decisions;
- incorporating secure text redaction tools, with automatic full-text search capabilities for specific types of data (e.g. names; Member States' acronyms);
- incorporating automatic text translation tools in order to enable a first assessment to be made of the scope (e.g. falling under Regulation 1049/2001 or not) of new applications..

Business Domain	Yes/No
Human resources	
Strategic Planning & Programming	
Document Management	Yes
External Communication	Yes
Internal Communication	Yes
Legislative Lifecycle	Yes
Grant Management	
Financial Management	
Asset Management	
Audit	

Business Domain	Yes/No
Procurement	
IT	Yes
Programme Management	
Statistics Management	Yes
Case Management	Yes
Trans-European Services and infrastructure management	
Crisis management	
Structured data exchange management (star systems)	Yes
Meetings domain	
Other: data protection	Yes

Business Domain	Political field	Political Topic	Macro Process	Process	Situation Impact Description	Impact to Process Owners and Users
Other	Data Protection	[Regulation (EU) 2016/679 – GDPR], REGULATION (EU) 2018/1725	Data protection	Transparency, Compliance , Processing personal data, Rights of the data subject	Data protection by design. Following the principles related to processing of personal data.	High
External communication	Transparent and democratic institutions	Regulation 1049/2001	Request for access to documents	Initial and confirmatory applications	New electronic platform for submitting confirmatory applications. Enhanced search capabilities. Enhanced statistical results. Improved transparency and feedback. Interfaces towards external systems.	High
Document Management	Transparent and democratic institutions	Regulation 1049/2001; eDomec rules	Document management	Document processing	Integrated document processing. Improved search. Workflow-based document management.	High
Internal division of work and communication	Transparent and democratic institutions	Regulation 1049/2001: eDomec rules	Application processing	DG processing	Workflow-based approach. Improved search capabilities. Integration with corporate solutions. Improved transparency.	High
				SG processing	Complement rather than	High

Business Domain	Political field	Political Topic	Macro Process	Process	Situation Impact Description	Impact to Process Owners and Users
					duplicate processes. Improved transparency. Workflow-based task management.	
Structured data exchange management (star systems)	documents under Regulation 1049/2001	Regulation 1049/2001	Communication	Secure data transfer	Enable secure data transfer to external entities (e.g. Parliament, Member States)	Medium
IT	Transparent and democratic institutions	Regulation 1049/2001, Regulation (EU) 2016/679	System capabilities	Integration with corporate solutions	Improved system flexibility will allow integration with new solutions relevant to the business process.	Medium
Case Management	Transparent and democratic institutions	Regulation 1049/2001; Working Methods of the Commission	Respect of legal deadlines	Corporate delay monitoring	A corporate delay monitoring system with automatic alerts for Commission services and applicants will ensure a better respect of the legal deadlines and the identification of possible bottlenecks	High

2.2.2 Impact on Stakeholders and Users

Figure below illustrates the simplified flow of information and the involved stakeholders:

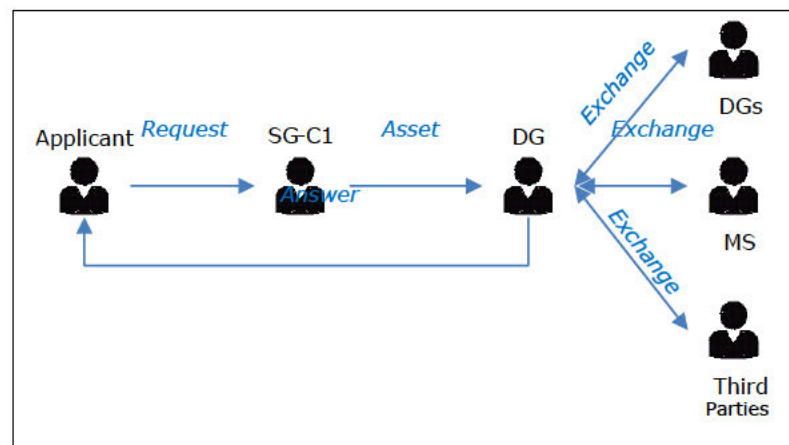


Figure 1: Simplified view of the interactions between actors

2.2.2.1 Applicants

The new system aims to promote electronic exchanges to speed up the processing of the request to documents. It will support both initial and confirmatory applications.

Applicants will benefit of better transparency (e.g. through automatic notifications and workflow monitoring). They will have better tools to search for existing documents, including those previously disclosed under Regulation 1049/2001. The new system will be compliant with the requirements for 'data protection by design' flowing from the new Data Protection Regulation 2018/1725.

2.2.2.2 Commission Services

The new system aims to better assist users in the Commission services responsible for handling initial applications for access, and the Secretariat-General users responsible for handling confirmatory applications by allowing the automatisisation of certain tasks, incorporation of standardized templates and replies, notifications in case of approaching deadlines and better identification of similar previous applications to access to documents.

2.2.2.3 Other persons associated to the request

The new system aims to better assist users from Member States and third parties by using systematic guidance, data mining to detect similar cases or specific (types of) words appearing in the text (e.g. personal data; Member States' acronyms), provide relevant pre-filled templates, facilitate the translation of the documents, displaying a comprehensive timeline and fully electronic communication with the Commission.

2.2.2.4 IT landscape

By using an integrated information system, the Commission will be able to ensure an efficient and coherent treatment of requests and their rigorous follow-up.

2.3 Interrelations and Interdependencies

The Commission provides limited integration with the corporate document management system. Commission staff relies on email communications for requests processing in addition to using the system.

In order to handle applications for public access to European Commission documents, Commission staff needs to exchange information with applicants, Directorates-General, Member States and other third parties.

3 EXPECTED OUTCOMES

The main objective of the EASE project is to implement a one-stop-shop for submitting and handling the applications for access to Commission documents under Regulation 1049/2001. . It is designed to tackle the issues outlined in the analysis of the surveys conducted amongst Commission staff, the general public (including applicants), Member States and the unit in the European Parliament dealing with access to documents.

The solution aims to provide the Commission with an end-to-end electronic system that supports the business process for handling initial and confirmatory applications, including better delay monitoring and more informative statistics.

The system will provide applicants with a streamlined interface, more transparency through e.g. status updates and more powerful tools for searching and accessing exiting documents, including those disclosed in previous applications for access to documents.

Public administrations and European institutions will be able to make use of the functionalities developed for the new information system for their secure electronic exchange of information with the Commission, other institutions and Member States, thereby facilitating cooperation and reducing handling times.

The solution will 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.

4 POSSIBLE ALTERNATIVES

This chapter covers the four alternatives that were explored during the study conducted in 2018 and the preliminary analysis:

- A. Do nothing.
- B. Using the Alaveteli solution, employed by AskTheEU.
- C. Using CASE@EC, the corporate solution for case management, developed by DG COMP.
- D. Develop a Building Blocks based solution and take advantage of existing ISA² and corporate building blocks.

4.1 Alternative A: Do Nothing

4.1.1 General Description

GestDem is the system currently used to handle requests for access documents under Regulation 1049/2001.

Doing nothing would force the Secretariat-General to retract the system in 2021^{4,5} due to the expiry of the ColdFusion technology by that time.

4.1.2 SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> Low budget for maintenance compared to development of a new system. 	<ul style="list-style-type: none"> GestDem is not adapted to the growing volume of requests and the complexity of the processes. Processing a request takes time and resources due to manual verification and processing. The business process for handling requests and its outcome is not standardised, as a result of which the thrust of the reply may vary from one Directorate-General or case handler to another. The ColdFusion technology underlying GestDem will no longer supported by DIGIT from 2021. Difficult to recruit experts with the necessary skills in ColdFusion technology. .
Opportunities	Threats
	<ul style="list-style-type: none"> The delays and the limited set of functionalities in the current system put at risk the coherence in the handling of applications for access, resulting potentially in reputational damage.

⁴ IT Board Operational conclusions of 18/10/2018

⁵ Note to the IRMs of the DGs and Executive Agencies: ColdFusion 11 and next steps of 08/09/2016

	<ul style="list-style-type: none"> • The paper-based communication of replies (by registered mail and express courier service) has been criticised by the European Ombudsman and civil society, affecting negatively the Commission's pursued image as a 'modern' and 'transparent' administration.
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4.1.3 Qualitative Assessment

This alternative would maintain the current status quo, with the severe limitations in term of transparency, quality and high workload for all users.

This alternative provides a limited set of features for all users. It supports a limited subset of the requested features. Notably, it does not cover the confirmatory request workflow and has limited support for the internal workflows in the Commission.

DIGIT will cease support to ColdFusion in 2021.

Factoring in all considerations, we conclude that this is **not a viable alternative**.

4.2 Alternative B: Using the Alaveteli solution

4.2.1 General Description

Alaveteli is an engine that interfaces citizens with authorities, used by AskTheEU.org. It provides application management, time tracking, search capabilities and an interface to the authority's request entry point. In case of the European Commission, the entry point is an email address.

It is important to stress that Alaveteli does not deal with the internal workflow of authorities.

Contact points:

- Web: <http://alaveteli.org/>
- Web: <https://www.asktheeu.org/> is an example site using the Alaveteli engine

4.2.2 SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • NGOs in multiple jurisdictions already use the Alaveteli solution. • Proven open source product. • Requires limited development for the public interface for communication to users. 	<ul style="list-style-type: none"> • Alaveteli does not cover internal workflows. • The engine must be interfaced with European Commission's tools (e.g. document management). • Programming language used by Alaveteli (Ruby on Rails) is not a standard at the Commission. • Even if we use Alaveteli for the 'frontend' (public interface), we would still need to develop the 'backend' (management system). • Not fully compliant with GDPR .
Opportunities	Threats
<ul style="list-style-type: none"> • Take advantages of the functionalities offered by the tool. 	<ul style="list-style-type: none"> • Third-party product.

4.2.3 Qualitative Assessment

Out of the box, this solution covers a limited subset of the business requirements.

The tool can only manage a subset of the process, namely the interface with applicants ('frontend'). It does not cover the request management aspects:

- follow-up of requests by the Commission and consultation with third parties,
- related monitoring and statistical functionalities

and it is not fully compliant with data protection regulation

The tool uses the Ruby on Rails framework/language. DIGIT does not currently support this technology.

Given the limitations, we conclude that **this alternative is not viable**.

4.3 Alternative C: Using CASE@EC

4.3.1 General Description

This alternative would consist in using CASE@EC, the corporate case management building block developed by DG COMP.

The main goal of the CASE@EC Project is to deliver a modern, efficient and re-usable solution for case management, which fulfils the common business needs of the participating Directorates-General in the project (AGRI, BUDG, COMP, MARE, TRADE and OLAF). The product has a Directorate-General-agnostic design, allowing inclusion of other stakeholders. It uses IBM Case Manager.

Contacts:

- Web: <https://webgate.ec.europa.eu/fpfis/wikis/display/CASEatEC>
- Email: COMP-CASE@ec.europa.eu

4.3.2 SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • A generic 'Case Management Tool' customised with common business needs of the Commission. • Scalable software • Connectivity to a vast array of Commission building blocks and systems. 	<ul style="list-style-type: none"> • User interface is not always very user friendly • A custom form for the applicant's requests must be developed. The form will not link directly to case data. • Roadmap to integrate the already involved Directorates-General is full until 2022, while the full EASE project has to be delivered at the end of 2020. • Portal for external users' needs to be developed. • As the new system will be workflow-based, CASE@EC would need structural adaptations to take on board the requirements of the EASE project.
Opportunities	Threats
<ul style="list-style-type: none"> • Based on the 'IBM Case Manager' solution. This approach may result in lower running costs as expertise can be involved on demand (e.g. consultants). • Use a tool specifically tailored for the Commission. 	<ul style="list-style-type: none"> • Implementing cases requires IBM expertise. • The IBM product has a per-node licencing model. Licencing costs need to be factored into the final solution, and are subject to change. • The risks are mainly related to the time needed for obtaining a mature product, the complexity for the business and the technical team to apprehend the tool and possible future changes in IBM's pricing and technical assistance policy. • Complex governance in place for CASE@EC may affect delivery of changes required for the EASE project. • Business needs to be trained to the product as well as the technical team – currently, no IBM Case Manager Experts are available in Secretariat-General.

	<ul style="list-style-type: none"> • Trained resources pose a retention risk due to financial constraints and market demand.
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4.3.3 Qualitative Assessment

This tool is a corporate case management product initiated by DG COMP. The purpose of this product is to evolve in the coming years to become a standard tool for the Directorates-General.

The tool uses a fee-based approach and an inherent dependence on IBM's pricing and assistance policy.

A solution based on CASE@EC could cover an important part of the workflows employed by the European Commission. The features used by applicants or by other external stakeholders require complementary implementations.

CASE@EC team aims to deliver to production in 2022, giving priority to Directorates-General members of the Inter-service Working Group⁶. This approach, coupled with the specific skillset required to deliver a solution, implies a realistic delivery for Unit SG.C.1 – Transparency, Document Management & Access to Documents around 2022. This schedule is not in line with the time constraints of the EASE project to be delivered partially in 2019 and in full in 2020.

The primary weakness of CASE@EC is its incompatibility with the business processes used in the handling of applications to access to documents. The handling of such applications requires a workflow based on well-defined and pre-established steps. In contrast, CASE@EC is case-based.

Taking into account all above factors, we conclude that **CASE@EC is not a viable alternative.**

⁶ Inter-service Working Group is composed of: DG COMP (chair), OLAF, DG AGRI, DG MARE, DG TRADE, DG BUDGET

4.4 Alternative D: Develop a Building Blocks Based Solution

4.4.1 General Description

The Commission services spend significant resources in processing applications to access to documents.

The approach is to reuse existing components and ISA² building blocks e.g. eID, EU Send (eDelivery/e-TrustEx usage will be transparent), EU Access, Corporate Search and Compass Corporate. It will reduce the development workload while guaranteeing coverage of the identified requirements.

By developing a component-based solution, we will provide coherence in the whole workflow (including the citizens, Commission services, Member States and third parties).

A Building Blocks based solution is a dual opportunity to for the Secretariat General and the Commission to:

- Use and develop smart components that could be further reused
- Maximise synergies with existing solutions and building blocks.

4.4.2 SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • Modular application. • IT tool fully adapted to the needs of the the citizens and the Commission services • In line with the digital strategy of the Commission. • Optimal exploitation of synergies. • Control over the timeline. 	<ul style="list-style-type: none"> • Dependence on external contractors to develop the solution. • Integration with third-party modules and so, potential adaptation of third-party modules.
Opportunities	Threats
<ul style="list-style-type: none"> • Reusing services provided by DIGIT and other Directorates-General. • In a second step, integrate advanced tools like DORIS. • Data protection by design. 	<ul style="list-style-type: none"> • Overlapping with some functionalities available in CASE@EC.

4.4.3 Qualitative Assessment

This approach has the potential to develop a high range of business functionalities in the predefined period of the EASE project 2019-2020. It also allows for agile integration of features. It capitalises on existing in-house expertise, corporate solutions, building blocks and frameworks.

Consequently, this alternative is considered viable.

4.5 Conclusion

To conclude, based on the above analysis of alternatives, the chosen solution is 'Alternative D: Develop Building Blocks Based Solution'.

Table below presents a non-exhaustive inventory of the possible reusable components for the Building Block-based solution.

Components	Service name
EC Portal	Compass Corporate: MyWorkplace
Workflow	Compass Corporate: WF engine
Document repository	Ares/Hermes
Notification	Corporate Notification System
Visa/eSignature	eSignature/eSeal
Link to external systems	Vista and External Repository Services (ERS)
Task management dashboard	Compass Corporate – Task Centre
Actors & Roles	EU Access
Workflow Engine	Compass Corporate – e-Workflow
Confidentiality negotiation	eConfidentiality
Data transfer	EU Send (the building block choice will be transparent)
Data mining	DORIS
Search of documents	Corporate Search

The project teams will investigate their usage and will include them in the solution if useful.

5 SOLUTION DESCRIPTION

5.1 Legal Basis

- Article 15(3) TFEU,
- Regulation 1049/2001,
- Regulation 1367/2006,
- Regulation 1725/2018,
- Commission Decision 2001/937/EC.

5.2 Benefits

The following benefits have been identified:

- The solution will offer a new set of features, such as workflow management with regard to initial and confirmatory requests and data protection by design. It will improve existing workflows (e.g. search facilities, interactions with third parties and applicants, elaboration of informative statistics). It will help the Commission to increase its productivity (do more with same amount of resources).
- Implementing features requested by stakeholders such as search and retrieval of previous replies and previously released documents, automated communications via templates, would contribute to reducing the response times.
- Enhanced feedback to applicants and easier access to already available documents would lead to enhanced transparency.
- Improved reporting and feedback to users will help increase the quality of service. Business-driven built-in reporting capabilities for key indicators will facilitate the monitoring of the quality of replies and the respect of the legal deadlines.
- Implementing an end-to-end electronic workflow will decrease operational expenses (e.g. postage) Using state-of the art technologies will also contribute to lowering system maintenance costs, and reinforce the Commission's image as a modern and transparent public administration.
- The proposed solution seeks to leverage synergies with corporate solutions. We have identified potential interactions with ARES and public registers of Commission documents)

5.3 Success Criteria

The project will be considered a success if the IT solution will cover the 'TO-BE' workflows in an efficient manner. Success criteria are defined for the project, independent on the selected solution. The Project Steering Committee will use 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, resulting in only 5% of requests lodged by non-electronic means;
- 20 % reduction in the time needed for the administrative handling of applications for access;

- Fully electronic communication flows with the Commission services' counterparts in the European Parliament and the Council;
- 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; personal data minimisation).

5.4 Scope

The following items are 'IN SCOPE':

- the in-depth analysis of the system:
 - In-depth analysis of requirements;
 - In-depth design of the future 'access to documents' processes;
- the implementation of the system:
 - Technical architecture of the online platform for citizens and of the management system for requests handling;
 - Development of the online platform for applicants, enabling the public to request documents, communicate with the Commission and access the (fully or partially) released documents through the platform;
 - Development of the management system for the handling of requests for access to documents; training material and communication with users.;
 - Testing.
- Transition in production of the system, trainings and communication to users.

The items 'OUT OF SCOPE' of the project are:

- The repository where the documents are stored (the current Register of Commission Documents);
- 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.

5.5 Solution Impact

Process	Solution Impact Description
Access to documents partially or fully released in the past	The system will provide search capabilities to access the documents partially or fully released in the past
Submitting applications for access to documents held by the European Commission	It will use best practices to optimise user-friendliness. The IT system will allow easy and electronic submission of confirmatory applications. All correspondence between the applicants and

Process	Solution Impact Description
	Commission service will be done electronically via the IT system
Handling applications for access to European Commission documents	<p>The system will provide an electronic workflow for the handling of initial and confirmatory applications for access. It will improve corporate capabilities to identify similar requests submitted in the past and streamline the communication with third parties. It will enable secure data transfers to external entities. The system will incorporate automatic translation tools.</p> <p>The system will provide capabilities to identify previous similar requests and corresponding replies.</p>
Document management	The system will be integrated with corporate document management solutions. It will provide a mechanism to identify similar documents, including those released under previous applications for access.
Reporting	The system will provide advanced reporting capabilities. This will enable Commission services to identify bottlenecks, monitor the respect of the legal deadlines and have an overview of the (types of) documents requested and released under Regulation 1049/2001.
Data protection	The system will implement data protection by design, following the principles relating to processing of operational personal data.
Communication	The system will enable end-to-end electronic communication with external entities. It will provide templating mechanisms to facilitate communication with external stakeholders.
Transparency	The system will improve transparency by providing better feedback on the state of play of each application.

5.6 Deliverables

The high-level deliverables for the project will be:

- Online portal for citizens and management system for the Commission services to handle the requests to access to documents including:
 - Functional and technical specifications
 - Acceptance test plans
 - Administration and user manuals
- Business implementation and transition plans.
- Communication plan.
- Training.

5.7 Assumptions

The following assumptions have been formulated:

- Availability of expertise and financial resources.

- Adaptations to linked systems (Ares, Register of Commission Documents,...) designed and implemented where necessary and in a timely manner, so as to ensure compatibility with the new IT system.

5.8 Constraints

The project is subject to the following constraints:

- Limited financial/human resources.
- The current IT system uses in a phased-out technology (ColdFusion) which will no longer be supported by the Commission IT landscape as from 2021.
- Business processes must continue uninterrupted.
- The system must be designed with data protection as a core feature.
- The internal and external interfaces must comply with the DG COMM UI/UX recommendations and guidelines.

5.9 Risks

The following risks have been identified:

ID	Risk	Mitigation
1	Compass Corporate components are not ready in time	Follow-up of the risks with the Compass team
2	Delivery on time	Incremental delivery of the tasks. Include the Business in the all phases of the project
3	Business requests too ambitious in terms of scope and schedule	Incremental delivery of the tasks, in order to provide core added-value business first and managing requests in a second phase with agreement of the business
4	Substantially higher funding for 2019 and 2020 required - not yet secured for 2020	Follow up the risk with ISA ² and the corporate governance instances. Prioritise features with the business. Involve external stakeholders (e.g. Directorates-General) to contribute features 'in kind'.
5	Modules not available	Implicate the modules' owners, business and other stakeholders in module implementation. Contribute to the module if necessary.

5.10 Costs, Effort and Funding Source

1.3 FTE officials and 10 external contractors will be involved in the development of the system. 2 external contractors and 0.1 FTEs official will maintain it. For short periods, several officials (owners of the Commission building blocks and systems) will provide expertise on integrating their components with the final system (0.2 FTE as support). Units SG.C.1 - Transparency, Document Management & Access to Documents and SG.C.5 - Digital Solutions & Process Efficiency will perform support and coaching.

Due to the administrative nature of the Secretariat-General, IT infrastructure and hosting costs are not charged back.

Solution Implementation Costs (k€ & FTEs)	2019	2020	2021	2022	2023	TOTAL
Solution Development	700 ⁷ 0,6	600 ⁸ 0,6				1300 1,2
Solution Maintenance		40 ⁹ 0,05	50 0,1	40 0,1	40 0,1	170 0,35
Support	0.2	0.2				0.4
Training						
Infrastructure	-	-	-	-	-	-
TOTAL	700 0,8	640 0,85	50 0,1	40 0,1	40 0,1	1470 1,95

Business Implementation Costs (FTEs)	2019	2020	2021	2022	2023	TOTAL
Change management		0.05				0.05
Start-up costs	0,30	0,20	0,20			0,70
Coordination	0,40	0,30	0,10			0,80
Training	0.02	0,05	0,06			0,13
TOTAL	0,72	0,60	0,36			1,58

⁷ 600K from the ISA² budget line and 100K from the Registers and Publications budget line

⁸ 500K from ISA² budget line and 100k from the Registers and Publications budget line

⁹ Part of the maintenance budget will be migrated from the current application, GESDEM

5.11 Roadmap

This project will follow agile principles for building the IT solution. Agile sprints will be of 2-4 weeks.

Initiating Phase:

Definition of the context, impact and outcomes of the envisaged solution	2018
Business Case approved	Q1 2019
Project Charter approved by the Information Technology and Cybersecurity Board	April 2019

Planning Phase:

Project planning artefacts approved	April 2019
Security Plan	2020

Executing Phase:

Request for new Website to DG COMM	June 2019
Architecture Overview	June 2019
Public Portal and Requests Management system (Version 1)	Q4 2019
Public Portal and Requests Management system (Version 2)	Q4 2020

Closing Phase:

Project completed	Q4 2020
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5.12 Synergies and Interdependencies

The Project Support Team has identified an array of components for the proposed solution:

- The system will use **HAN** to reference relevant documents
- **EU Login** facilitate users' access to a wide range of Commission information systems
- **Compass Corporate** provides multiple features e.g. workflow engine, document management
- **EU Send** will help the system with secure data delivery in order to integrate with other stakeholders' systems
- **eSignature/eSeal** provide mechanisms for creating and verifying electronic signatures
- **eTranslation** provides machine translation capabilities to help stakeholders exchange information across language barriers
- **Secunda/EU Access** provides user authorisation management
- **Corporate Search** for the search of documents

The landscape of corporate solutions is evolving continuously. Thus, Project Support Team will monitor for relevant components and propose them to the Project Steering Committee as they become available.

The solutions developed in this project will be shared with other Directorates-General or external stakeholders that may be interested in extending the system with new features or in integrating components in their own workflows.

6 GOVERNANCE

6.1 Project Owner (PO)

The Project Owner is [REDACTED], [REDACTED] SG.C.1 - Transparency, Document Management & Access to Documents.

6.2 Solution Provider (SP)

The Solution Provider is [REDACTED], [REDACTED] SG.C.5 - Digital Solutions & Process Efficiency.

6.3 Approving Authority

The Approving Authority is the IT and Cybersecurity Board.

Signature of the approving authority Date

APPENDIX 1: REFERENCES AND RELATED DOCUMENTS

ID	Reference or Related Document	Source or Link/Location
1	Project folder	Collaborative site
2	Public access to documents Regulation EC N°1049/2001	EurLex
3	General Data Protection Regulation EC N°2016/679	GDPR
4	AS IS Business Process Analysis Report	Collaborative site
5	TO BE Business Process Analysis Report	Collaborative site
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	Ombudsman
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	Collaborative site
9	Note to the IRMs of the Directorates- General and Executive Agencies: ColdFusion 11 and next steps	Ares(2016)5120861