



EUROPEAN COMMISSION

**MEETING WITH EUROPEAN CITIZENS' INITIATIVES (ECI)
ORGANISERS ON THE HOSTING OF ECI ONLINE COLLECTION
SYSTEMS BY THE EUROPEAN COMMISSION**

7 September 2012

SUMMARY REPORT

PARTICIPANTS

European Commission:

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Mario Paulo Tenreiro, Manuel Szapiro, Olga Kurpisz, Charlotte Rive, Annalisa Buscaini (Secretariat General – Institutional team G4),

Ulrich Kroener, Peter Flack (DG Human Resources and Security – Security Directorate)

ECI "Uno di Noi":

Sophia Kuby, Ana Del Pino García Barrera, Carmelo Floridia, Michele Trotta

ECI "Let me vote":

Alain Brun, Philippe Cayla (from Paris via videoconference)

ECI "High Quality European Education for All":

Blandine Smilansky, Hors Nickels

ECI "Single Communication Tariff Act":

Aline de Meester

ECI "Fraternité 2020":

Luca Copetti

ECI "Central public online collection platform for the ECI":

Carsten Berg

1. REMINDER FROM PREVIOUS MEETING

European Commission (EC) recalled its commitments, as explained during the last meeting:

1. Host interested ECI's online collection systems on a platform in the EC Datacentre.
2. Prepare all documents related to hosting environment for certification by the competent Luxembourgish Authority.
3. Give advice/guidance/support documents on how to draft the organisers' Risk Management documentation.
4. Help the organisers on any other technical issue related to their certification request for their online system (e.g. to secure their own environment).
5. Help the organisers in their notification to the Data protection authorities, if needed.
6. Train the organisers in the operation of OCS.
7. Provide personalised assistance/guidance to the organisers.

Commission Vice-President Sefcovic had further agreed to extend the 12-month deadline for the first registered initiatives until the Commission's hosting environment is made fully operational.

2. TOUR DE TABLE

Organisers asked a number of questions to the EC.

How many notifications to the Data Protection authorities are required for the Online Collection system?

Answer: The notification to Data Protection authorities is required by the legislation on data protection in each Member State (it is not something specific to the citizens' initiative). In principle, each person signing the host agreement with the EC must notify the Data Protection authorities of their country of residence. If the hosting agreement is only signed by the representative of the citizens' committee, one notification to the Data Protection authorities of his country of residence would be enough. Organisers are nevertheless advised to enquire from their data protection authorities. Organisers must provide proof of notification(s) to the EC.

Why must organisers sign a hosting agreement?

Answer: This will reassure all parties, first among which the Luxembourgish authority, that responsibilities are contractually and formally clarified.

What prevents the Commission from performing all of the required risk assessment activities on behalf of the organisers?

Answer: The EC cannot specify how organisers go about their business. In short, as applicable to the OCS use, organisers need to answer the basic questions of "who does what, how, where and when". Also, the EC cannot choose the mitigating measures for the Organisers, as this would amount to interference.

Is there any way to know how many people have signed the initiative?

Answer: Yes, the admin module of OCS displays that information. So far there is no connection between OCS and other systems to, for example, update the ECI web page with that information.

Is it true that OCS doesn't allow French people to support initiatives?

Answer: There was a problem with people coming from some French 'Départements', because their ID card numbers didn't pass the validation checking. After receiving the correct information from the French authorities, the problem in OCS was fixed within hours and EC confirms this problem is no longer present.

The 12-month period for collection of signatures has been extended. What is the new deadline?

Answer: The final deadline for collection of signatures has not yet been fixed. EC will come back to organisers of ECI as soon as the deadline is known.

A lot of people from the EC are attending the meeting. Is it possible to provide to the ECI organisers the EC organisation chart?

Answer: EC will send the organisation chart. Please see the list in Annex.

Is it necessary to include in the source of funding the private donations? If yes, how? Should the donator name appear or just "private donation"?

Answer: For reasons of transparency, in accordance with the ECI regulation, organisers are required to disclose any source of funding and support of more than 500 €/year/sponsor. The name of the sponsors (including individuals) should be indicated.

EC promised training to Organisers, what is the procedure to arrange it?

Answer: Please contact the EC to have training arranged on a bilateral basis.

Is it possible to improve and customise the OCS application, in particular to add campaigning tools?

Answer: OCS forms must be aligned with Annex III to Regulation EU 211/2011; i.e. the forms cannot include additional information such as e-mail addresses. However, the OCS is open-source, and as such can be extended. The EC will nevertheless not host any modified versions of OCS. The OCSI hosted at the EC cannot be modified by organisers, and in particular it is not integrated with an organisers' web site. The

EC suggests that the organisers' web site can drive social media interaction or collect supporters' email addresses with their consent, and then link to the OCS site.

3. STAY OF PLAY / ROLES OF ORGANISERS IN THE CERTIFICATION PROCESS

EC HOSTING

EC completed the set-up of the OCS environments in the Datacentre located in Luxembourg. EC and Luxembourgish authority have collaborated very closely to have everything ready for September 15th. An audit of the OCS deployment already took place during the last two weeks and an additional meeting between EC and the Luxembourgish authority will take place next Tuesday to clarify any outstanding issue.

ORGANISER RISK ASSESSMENT

EC will provide to the ECI organisers the guidance templates needed to run their own Risk Assessment. In addition to the documentation, EC is available for any question and ready to review the ECI documentation before organisers submit their formal request for certification.

The Organiser Risk assessment documentation is composed of the following documents:

- a) Organiser Scope of Security. This document has to be produced by ECI organisers. In this document they will describe their own organisation and what are the roles and responsibilities within.
- b) Organiser Risk Assessment Report. This document describes the main risks in the management of the ECI initiative. It has been produced by the EC and ECI organisers will include it in the documentation to request the OCS certification.
- c) Organiser Risk Treatment Plan. Based on suggestions from EC, ECI organisers will choose the countermeasures they will take to mitigate the risks.
- d) Organiser Statement of Applicability. This document describes the controls (policies, procedures, guidelines, practices or organisational structures) that are relevant and applicable to the organization's OCS. It has been produced by EC. ECI organisers will include it in the documentation to request the OCS certification.

HOSTING AGREEMENT

This is the second major component of the OCS documentation to be provided by ECI organisers to the Luxembourgish authority for the certification of their system.

It is similar to a standard hosting contract and it will have to be signed by at least the representative of the citizens' committee. Other members of the committee could also

sign it in addition to him. EC will request a copy of the ID card of people signing the Hosting agreement.

4. NEXT STEPS

EC will continue to support organisers in the preparation of their certification request, notably through meetings and personalised assistance.

Charlotte Rive (SG-ECI@ec.europa.eu) is the EC point of contact for the organisers.

A new meeting with Organisers interested in the Hosting provided by the EC will be scheduled for September 28th.

Based on the documentation provided by EC, ECI organisers need to complete their own Risk Assessment.

ECI organisers need to notify the relevant Data Protection authority(ies).

Once the ECI organisers have completed their own Risk Assessment, notify the competent Data Protection authority(ies) and signed the Host agreement with the EC, they can request the certification to the Luxembourgish authorities.

5. CLOSING REMARKS

- All the participants to the meeting will receive a summary report of the meeting.
- EC confirms that everything will be ready for organisers to request the certification on September 15th.
- By the end of next week (September 14th) organisers will receive a copy of the hosting agreement and the documentation/guidance package for the Organiser Risk Assessment.
- From that date, EC will be ready to hold bilateral meetings with the organisers to help them in their tasks, in addition to regular contacts by email and/or phone.
- A new meeting between the EC and ECI organisers will take place on September 28th.
- The OCS developer community has been launched in joinup.eu. All suggestions are welcome.

6. RELATED DOCUMENTS

- Meeting with ECI organisers, 13/06/2012

<https://joinup.ec.europa.eu/software/ocs/issue/minutes-meeting-eci-organisers-13/06/2012-1500-1700>

- Meeting on the Hosting of ECI Online Collection Systems by the European Commission, 08/08/2012

<https://joinup.ec.europa.eu/software/ocs/news/meeting-hosting-eci-online-collection-systems-european-commission>