

Ms Emily O'Reilly  
European Ombudsman

Your ref: Complaint 2273/2019/MIG  
Our ref: ICO/MIJU/2935c/2020  
Please quote when replying.

Warsaw, 7 December 2020

**Subject: Frontex's reply as regards complaint 2273/2019/MIG**

Dear Ms O'Reilly,

With reference to your proposal for a solution related to complaint 2273/2019/MIG, I would like to inform you that we prepared our Roadmap on how to update Frontex Public Register of Documents. Therefore, the document - envisaging short-, mid-, and long-term actions and deliverables - is hereby enclosed.

With regard to sensitive documents which are not included in the Public Register of Documents, I would like to reiterate that the number thereof will be published in the Consolidated Annual Activity Report as of 2020. As regards 2019, the data will be presented on our website.

Yours sincerely,



Fabrice Leggeri  
*Executive Director*

Annex: Roadmap to update Frontex Public Register of Documents

## Roadmap to update Frontex Public Register of Documents

Following the proposal from the European Ombudsman of 7 October 2020, Frontex presents its concrete actions to be taken in the coming months and years in order to:

- Update the Register of Documents in the short-term;
- Design a systematic approach across the Agency to maintain the Public Register of Documents regularly updated in a comprehensive manner;
- Prepare an adequate ICT infrastructure for this purpose.

It has to be born in mind that over 2021 the Agency is planning to implement the Commission's Advanced Records System (ARES) that in mid-term perspective will be used as platform to support the management of the Public Register of Documents.

### Short-term actions

**These actions are envisaged to be launched by the end of February 2021:**

- Stock-taking of all important documents held by all Frontex entities deemed suitable for inclusion in the Public Register of Documents launched by the end of 2020.
- Start developing a Public Register of Documents on the webpage by populating it with documents currently dispersed across different website sections. This will be done according to the categories available in filing plan/file list/retention schedule developed for Ares.
- Collecting feedback from sister EU agencies that already have a comprehensive Public Register on their website.

### Mid-term actions

**These actions are envisaged to be launched as of 2021 (most of them related to the preparatory steps of the implementation of ARES that is supposed to be fully done by end of 2021):**

- Developing a search engine and the (categories of) documents to be included in the Public Register of Documents.
- Determining properties of the European Commission's Advanced Records System (ARES) and the development of a protocol to display the name, registration number, the registration date and the subject matter and/or description of the documents.
- Preparing technical requirements for the dedicated platform - Public Register of Documents.
- Drafting necessary procedures to become a basis for a structured and systematic upload of the documents to the Public Register of Documents.

### Longer term deliverables

**This phase will commence with the ARES roll out envisaged for 2021/2022:**

- Frontex is to establish ARES as a General Register and the central Document Management System by end of 2021;
- After implementation of the system, Frontex will connect or move existing document registers/workflows into ARES. The exception will be done for 'specific' registers/systems as for example ABAC that will remain independent (these will be indicated in Document Management Policy expected to be finalised and approved in 2021);
- As soon as available, Frontex will implement an ARES functionality on creating a Publicly Available Versions (PAV) and will use the possibility to externalise/publish it on the website (if feasible to be integrated). Since the development of this functionality is still in a project phase, an estimated timeline is difficult to be provided (best case scenario - end of 2021);
- Documents released as part of public access to documents are also to be made available in the Public Register of Documents (this will be also possible through the PAV functionality);
- Once the system and PAV functionality are in place, the updates of the publicly available documents to the Public Register of Documents will be conducted in a structured and systematic manner.