

Retroplanning for the drafting of the Agency’s implementing rules for the processing of operational personal data (Article 90 EBCG Regulation)

No	Actions	Deadline	Responsibility	Stage
<p>The new Frontex rules on Operational Personal Data (‘OPD’) is to be adopted by the MB before the end of 2021.</p> <p>LPU is to coordinate the preparation of the OPD rules.</p>				
1.	Workshop on OPD organised involving MS/COM. Two subsequent meetings have been held with DPO/BUs.	24 June 2021	LPU	Done
2.	Establishing a Project Board (‘PB4OPD’) - for the preparation of a Management Board Decision adopting implementing rules concerning the processing of operational personal data by the Agency	26 July 2021	CAB/LPU	ED to approve the submitted draft (DMS) - key milestone
3.	Bilateral meetings with PB4OPD members to request to supply LPU with all the preparatory documents already produced (latest drafts, conclusions of past meetings, etc) in order to develop a draft concept	26 - 30 July 2021	LPU/PB4OPD members	Meetings to be held
4.	<p>Preparation for the PB4OPD kick-off meeting</p> <ul style="list-style-type: none"> Set the date, draft the agenda Develop a draft concept (or skeleton) Consider lines to take (e.g. EDPS) Draft allocation of tasks, setting up deadlines 	30 July 2021	LPU	In progress, internal LPU meeting scheduled 23 July
5.	<p><u>PB4OPD kick-off meeting</u></p> <ul style="list-style-type: none"> Agree on the process for the adoption Come up with a “skeleton” of the rules (e.g. controllership, definitions, purposes, info flow, storage, etc). BUs to identify their needs the new OPD Rules needs to address - mapping of all activities in the possible scope of Art 90 Task accordingly. Decide next steps 	2 - 9 August 2021 (tentatively 9 Aug 2021 at 10 am)	LPU (+ members)	Stage 2: planning and drafting
6.	Follow-up on work with the business units, if necessary.	23 - 27 August 2021		
7.	<p><u>2nd PB4OPD meeting</u></p> <ul style="list-style-type: none"> Take stock and progress with the work Identify necessary missing elements Task accordingly Check relationship with other DP rules 		LPU (+ members)	
8.	Follow-up on work with the business units, if necessary.			
9.	<p><u>3rd PB4OPD meeting</u></p> <ul style="list-style-type: none"> Present and discuss the first draft of the OPD Rules 		LPU (+ members)	

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	<ul style="list-style-type: none"> Identifying possible weak points of the draft Task accordingly if necessary 	6 - 10 September 2021		
10.	Internal consultation (involving also other business units who were not represented in the project board)	20 - 24 September 2021	LPU	
11.	Final draft is submitted to the Executive Management	8 October 2021		
12.	Consult COM on the draft	15 October 2021	LPU	
13.	Consult the MS on the draft, format to be decided (a second OPD workshop or written consultation).	15 November 2021	As in the first workshop	Stage 3 - consultations with external stakeholders - corrections if necessary
14.	Consult the EDPS on the draft (if necessary)	19 November - 17 December 2021	LPU	
15.	Present to the MB for adoption	17 December 2021 - end of the year	LPU	Stage 4 - adoption (by written procedure)

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