



European National Bodies cooperation - Prototypical process for multi-national self- declarations and compliance assessment

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Author(s)	Timo Hoffmann; Laura Kupers; Teet Eomäe; Patricia Pumpler; Benjamin Witsch; Zuzana Švédová; Irena Čačić; Albane de Crombrugghe
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Abstract

This document describes a support system (named ENBOSS – European National Body Support System) that allows for Service Providers and Data Providers to submit self-declarations in a central system in case their service or data is covering multiple countries. In addition, this system is designed to support the National Bodies in coordinating a joint compliance assessment of randomly selected self-declarations. This approach is meant to decrease the effort needed on both sides – the providers and the National Bodies.

Abbreviations

Abbreviation	Meaning
AD	Accompanying Documents
CA	Compliance Assessment
CAT	Core Alignment Team
DR	Delegated Regulation
EC	European Commission
ENBOSS	European National Body Support System
MS	Member State
NAP	National Access Point
NAPCORE	National Access Point Coordination Organisation for Europe
NB	National Body
SC, SCOM	Steering Committee
SCS	Steering Committee Support
SD	Self-Declaration
SP/DP	Service and/or data provider
SWG	Sub-working Group
WG	Working Group
WP	Working Programme

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Introduction

Background of the European National Bodies (NBs) Cooperation

The National Bodies (NBs) across various EU Member States often face similar challenges when implementing the ITS Directive and its Delegated Regulations. Tackling these issues individually, in isolation from each other, has led to inconsistencies in interpretation and redundancy in efforts. To overcome this, a cooperative framework among NBs has been established within NAPCORE, allowing them to address common challenges together, share expertise, and create harmonized solutions.

This collaborative effort allows NBs to benefit from the unique expertise of their peers across Europe. For example, certain NBs may have stronger legal knowledge, while others may excel in technical aspects or have extensive networks within the sector. By pooling these competencies, the NBs can develop more robust solutions. Additionally, countries that are in the process of establishing a National Body or do not yet have one in place can still contribute to and benefit from this cooperation, enhancing the knowledge base and creating a more integrated European approach.

Furthermore, many stakeholders affected by the Delegated Regulations are multinational companies. By working together, NBs not only gain more credibility but also strengthen their negotiating power, enabling them to engage effectively with these large multinational entities. Finally, collaboration among NBs reduces duplication of efforts, leading to more efficient and consistent compliance assessments (CAs), information sharing, and stakeholder engagement.

Importance of Cooperation for Multinational Collaboration

The challenges faced by National Bodies extend beyond borders, especially when dealing with multinational organizations. These companies operate across multiple Member States, which often means they have to comply with various interpretations of EU regulations. This inconsistency creates inefficiencies both for the multinational entities and for the National Bodies. Through a cooperative framework, NBs can align their processes and interpretations, ensuring that multinational organizations face a uniform set of requirements across Europe.

By coordinating their efforts, NBs can also strengthen their position when engaging with multinational stakeholders, ensuring that compliance assessments are more credible and less burdensome both for the multinational stakeholders and the National Bodies. Furthermore, this strengthens the ability of NBs to effectively implement the Delegated Regulations across Europe in a consistent and efficient manner.

Objectives and structure of this report

In this report, the scope of cooperative work amongst the NBs is widened to cover a common technical tool that supports the National Bodies, especially when it comes to dealing with multi-national data or service providers. The objective is to describe a possible supporting tool and process in a prototypical manner to show how a tool and process could look like, what it can cover, where it helps, and what issues remain or are new.

After this introduction, in the second chapter, the goals of the cooperation of the NBs on a European level are further described and options on the level of cooperation are given. The next chapter is dedicated to describing a technical tool and process: the “ENBOSS” – a European National Body Support System for multi-national compliance assessment. This system has been divided into modules,

that are detailed out with the process steps of the various actors. In the final chapter, we look at considerations based upon the experience gathered creating this process and next steps.

Goals of European National Bodies cooperation

The cooperation among NBs aims to achieve several goals, each of which focuses on improving efficiency, harmonization, and collaboration.

Regular Discussion on Shared Challenges

One of the core goals of this cooperation is to provide a forum where NBs can regularly discuss and address shared questions regarding their tasks, such as compliance assessments (CAs), stakeholder management, and the interpretation of Delegated Regulations. By meeting regularly, NBs can address common concerns, including:

- **Compliance Assessment (CA) Questions:** For example, how to interpret specific aspects of the regulations, such as restrictive licensing or random inspections.
- **Informing Stakeholders:** Sharing best practices for how to communicate effectively with stakeholders affected by the regulations.
- **Stakeholder List Management:** Coordinating approaches to maintaining and updating stakeholder lists.

By discussing these topics collectively, NBs can benefit in several ways:

- **Shared Expertise:** Each NB can contribute knowledge from their area of expertise, whether legal, technical, or operational, ensuring that all NBs are better equipped to handle complex challenges.
- **Harmonized Interpretations:** By working together, NBs can formulate consistent interpretations of the Delegated Regulations, ensuring that companies face the same standards across Europe.
- **Efficient Use of Resources:** Rather than solving the same problems independently, NBs can save time and resources by working together on shared issues.

Joint Communication with EU-Level Sector Federations

Many of the stakeholders affected by the Delegated Regulations are multinational organizations represented by sector-specific federations at the EU level. Examples include the European Parking Association (EPA), ACRISS (representing car rental companies), MOVE-EU (for shared mobility), and ChargeUp Europe (for electric vehicle charging infrastructure). By coordinating their communication and engagement with these federations, NBs can:

- Present a unified message regarding the obligations of these multinationals under the Delegated Regulations.
- Increase their impact and credibility when informing stakeholders about regulatory requirements.
- Explore possible collaborative efforts, such as joint initiatives or standardized approaches across sectors.

Collaborative Efforts on Multinational Compliance Assessments (CAs)

Another important goal of cooperation is to streamline compliance assessments for multinational organizations. These organizations often operate across multiple Member States, which can lead to fragmented and inconsistent compliance processes. Through collaboration, NBs can:

- **Address Multinationals Together:** By coordinating their efforts, NBs can engage with multinational organizations as a single entity, simplifying the process for these companies and improving consistency.
- **Share CA Results:** Where applicable, NBs can mutually recognize the results of compliance assessments carried out by other Member States, reducing duplication and inconsistencies.
- **Divide Workload:** For complex cases involving multinationals, certain compliance assessment tasks can be taken up by a multi-national support system (like the one described below), allowing for a more efficient and resource-effective approach.

This collaborative approach will not only reduce the workload for individual NBs but also ensure that the compliance process is more credible and uniform across the EU. It will also enhance the NBs' ability to engage with multinational organizations in a meaningful way.

Progress Towards Formal Collaboration

The current cooperation among NBs can serve as a stepping stone towards more formalized structures, such as the potential future establishment of a European body under the NAPCORE framework. While this collaboration is currently informal, it is important to consider future opportunities for more formal agreements and structures that will further enhance the ability of NBs to work together.

How could such cooperation look like? For effective cooperation among National Bodies (NBs) in Europe, certain organizational structures, resources, and platforms need to be in place. These elements will enable smooth collaboration, consistent communication, and efficient handling of multinational tasks, such as compliance assessments (CAs). Below are key components required to ensure the success of such a cooperative framework:

1. Establishment of a Coordinating Body

A central **coordinating body** would be responsible for organizing and moderating meetings, setting agendas, recording meeting notes, and ensuring that tasks are distributed efficiently. This role can be shared on a rotational basis between different NBs or divided among two or more bodies to balance responsibilities. The coordinating body would act as the backbone of the collaboration, ensuring that all activities are well-structured and progressing as planned.

→ NAPCORE can (e.g. with a dedicated Working Group) form an organisational framework for this National Body coordinating body.

2. Regular Meetings

To ensure consistent progress and open communication, **regular meetings** should be scheduled, such as every six months. These meetings provide an opportunity for NBs to discuss ongoing challenges, share results of compliance assessments, and coordinate future actions. The regularity of these meetings will help maintain momentum and ensure that no issues are left unresolved for too long.

→ NAPCORE's current WG5 has already formed an organisational framework for this National Body coordinating body.

3. A Secure Collaboration Platform

The cooperation will require a **secure platform** for sharing information and documents, enabling continuous collaboration between meetings. This platform could host forums or chat



functions where NBs can ask questions, share updates, and resolve issues as they arise. A system like the **NAPCORE SharePoint** could be used for this purpose, ensuring that all data is stored and shared securely in compliance with privacy regulations.

4. **Formation of Specialized Working Groups**

For specific issues or tasks, **temporary working groups** can be established to focus on particular challenges or topics (e.g., sector-specific compliance assessments). Each working group would be responsible for developing solutions and reporting back to all NBs during the regular meetings. This division of labour will help NBs address more specialized issues efficiently, while also providing expertise tailored to specific topics.

5. **Minimum Legal Framework and Agreements**

For any formal collaboration on compliance assessments or other shared tasks, a **legal framework** must be established. This framework will formalize the cooperation, ensuring that all NBs commit to their roles and responsibilities. In addition, **GDPR-compliant agreements** must be made to allow the sharing of contact information and CA results between NBs. These agreements will provide the legal basis for cross-border data sharing, ensuring that all collaborative efforts comply with European privacy regulations.

6. **Allocation of Sufficient Resources**

Each Member State must commit to allocating sufficient resources—both in terms of funding and working hours—so that their NB can actively participate in the cooperation. The benefits of this collaboration, such as reduced workloads for individual NBs and improved efficiency, will justify the investment. Adequate funding will also be required to support the role of the coordinating body and to maintain the collaboration platform. Financial support for these activities could be derived from **shared national funding mechanisms** or through **co-funding arrangements with European entities** (e.g. NAPCORE).

By ensuring these components are in place, the cooperation among National Bodies can move towards a more formal and structured collaboration, benefiting all participating countries and stakeholders. It will allow for a more efficient, transparent, and consistent approach to managing multinational compliance assessments and other shared regulatory tasks.

ENBOSS – the European National Body Support System for multi-national compliance assessment

Challenge

Currently, multinational organizations are required to submit a self-declaration (SD) (upon request) in each Member State where they operate. This fragmented approach results in inefficiencies for both the organizations and the National Bodies (NBs). A multinational company can, in theory, be asked to submit up to 30 separate self-declarations for a single Delegated Regulation, depending on how many Member States they operate in.

Once submitted, these organizations may also be selected for compliance assessments in multiple Member States through random selection processes. This not only places a significant administrative burden on the companies but also introduces inefficiencies for the NBs, which must process and assess the same company multiple times in different countries.

Moreover, this decentralized system can lead to conflicting outcomes. A multinational organization may be deemed compliant by one NB, while another NB reviewing the same dataset may come to a

different conclusion. These inconsistencies create confusion for the organizations and hinder the overall harmonization of compliance efforts across Europe. This disjointed approach also weakens the credibility and efficiency of the compliance assessment process.

The challenge, therefore, lies in developing a more efficient and harmonized system for both multinational organizations and National Bodies, one that reduces redundancy and ensures consistent, transparent compliance assessments across all Member States.

Proposed Solution: The ENBOSS System

As a potential future approach to address inefficiencies and inconsistencies in the current system, NAPCORE WG5 has envisioned a unified solution. This vision seeks to simplify the submission of self-declarations (SDs) for multinational organizations while decreasing the administrative workload and assessment demands on National Bodies (NBs). We propose the European National Body Support System (ENBOSS) as a conceptual digital platform designed to support the submission, management, and assessment of self-declarations on a multinational scale.

The vision of ENBOSS provides a solution that allows multinationals to submit one SD, preferably digitally, which is valid for all Member States. This would help motivate the multinationals to submit SDs and thus increase the number of submitted SDs. Additionally, the tool could assist the NBs in multinational compliance assessments, since these international SDs could be assessed at a multinational level, leading to one harmonized outcome for the CA and decreasing the workload for the individual NBs. On top of that ENBOSS can also be in charge of the random selection process and supervise the multinational CA (carried out by one or more NB).

In the next sub chapters a detailed description of the ENBOSS-solution is given. The process is divided in different modules (the red boxes), and for each module the goals, the requirements, the process and the outputs as well as the identified potential issues are described. The overall picture on page 11 can be hard to read, but in each sub chapter one module is enhanced to a readable size.

General description and components of ENBOSS

ENBOSS (European National BOdy Support System) is a centralized platform that manages the end-to-end workflow for self-declaration and compliance assessments, providing a standardized mechanism for data providers, National Bodies, and NAPCORE to communicate and process relevant documents. It ensures consistency across participating bodies by handling submissions of self-declarations, random selection for compliance assessments, document management, and final compliance reporting.

Core Components

- **Web Interface for Self-Declaration (SD) Submission**
 - A front-end that allows data providers to log in, submit self-declarations, and attach any required documentation.
- **API for Data Transfer (NAP / NB systems to ENBOSS)**
 - A programmatic interface enabling National Access Points and National Bodies to send or retrieve self-declaration data directly to ENBOSS.
- **Secure Database**
 - A data store where all self-declaration records, user information, metadata, and compliance information are securely held.
- **Document Management System**

- Facilitates the storage, retrieval, and versioning of files and supporting materials attached to each self-declaration or compliance assessment.
- **System Administration Module**
 - Provides administrators with tools to manage user roles, configure system settings, perform maintenance tasks, and ensure the platform's security and reliability.

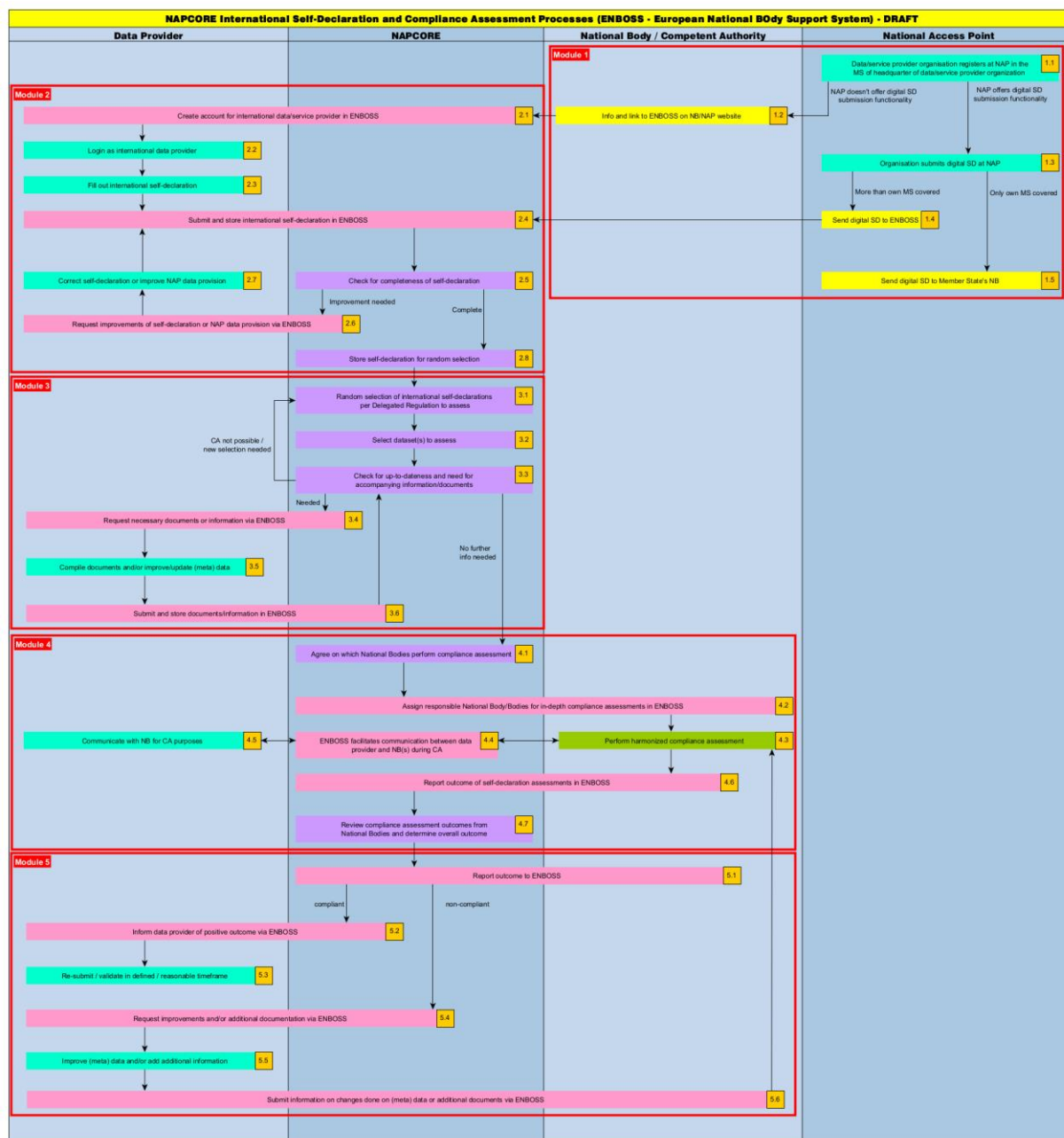
Workflow of SD & CA using ENBOSS

The following is a representation of the workflow of SD submission and CA using ENBOSS. The following colors have been used to differentiate the various roles/actors:

	Service provider or data provider
	National Access Point
	ENBOSS – the European National Body Support System
	NAPCORE, and specifically the group of National Bodies within NAPCORE
	National Body / Competent Authority

Mostly they align with the “swim lanes” in the following workflow diagram, except for two instances:

1. The ENBOSS is mostly used to facilitate communication between the various roles. Therefore, no dedicated swim lane was used, but rather a box spanning between the various roles concerned was used to illustrate this cross-actor role.
2. In the beginning of the process, the service provider or data provider starts at the National Access Point to provide, along with their data provision, their self-declaration.



The ENBOSS process is aligned with the harmonized compliance assessment process from NAPCORE¹ that was drafted for national compliance assessment.

Demonstration of multi-national SD & CA using a simulated ENBOSS

In the following, the process of a multi-national SD and CA using ENBOSS as pictured above is described in more detail. For this, five modules depicted as red boxes in the diagram above have been defined:

Module 1 – Submission of SD at NAP (if available)

Not strictly a module of ENBOSS, in this module the data or service provider submit their self-declaration at the National Access Point if this is an available functionality of the NAP. In this case,

¹ Current version: https://napcore.eu/wp-content/uploads/2024/09/Guidelines-Compliance-Assessment_v2_clean.pdf

the NAP forwards the digital SD to ENBOSS. Otherwise, the provider is guided to ENBOSS to submit the SD directly.

Module 2 – Completing and Submitting the Self-Declaration

Data/service providers create an ENBOSS account, fill out the international self-declaration, and submit it for basic completeness checks.

Module 3 – Random Selection and Preliminary Assessment

Based on defined criteria, NAPCORE use ENBOSS to randomly select submitted self-declarations for in-depth compliance assessment and request any missing documents.

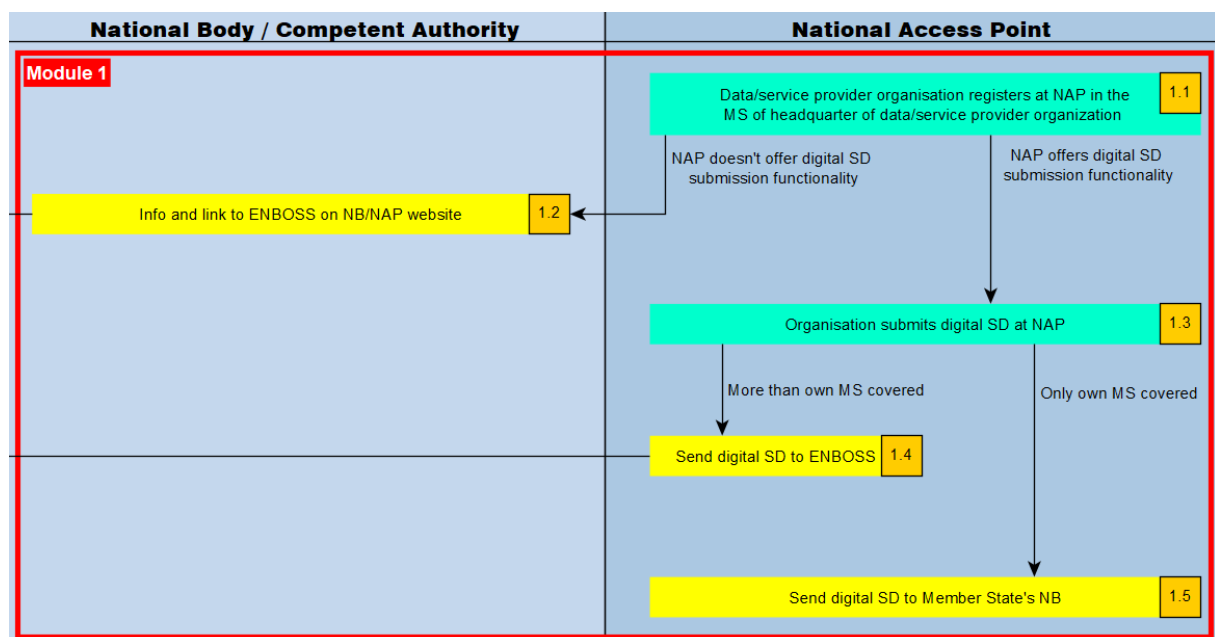
Module 4 – Assigning and Conducting the Compliance Assessment

NAPCORE assigns the responsible National Body(ies) to perform a harmonized in-depth compliance assessment, communicating with the data/service provider as needed.

Module 5 – Reporting Results and Follow-Up

Assessment outcomes (compliant or not) are reported in ENBOSS, with providers informed of results, any required improvements, and opportunities for resubmission.

Description of the simulated process – Module 1



Goal of this module

Module one describes how a stakeholder can submit a (multi-national) digital SD and how the interaction between the NAPs and ENBOSS works.

Requirements and input(s)

- All NBs participating in ENBOSS must use the harmonized NAPCORE forms and templates for the compliance assessment process (self-declaration and accompanying documents).
- A digital tool (form) must exist that allows organisations to fill in a digital self-declaration for the respective DRs. This tool must be either on the NAP or on the ENBOSS website.

- NAPs which are cooperating with ENBOSS should support the transition or harvesting of digital self-declarations. If a NAP does not support these automatic procedures, a manual transfer of the digital self-declaration from the NAP to the ENBOSS needs to be foreseen.
- The NAP must distinguish between national and multi-national SDs.

Process description

Step #	Who is actor?	Situation	Task	Outcome of task	Next step in process
1.1	SP/DP	Data needs to be made accessible at a NAP and/or SP/DP needs to submit a SD	Organisation registers at a NAP in the MS of headquarter to describe data/services and/or create self-declaration.	Registration of the organisation at the NAP	1.2/1.3
1.2	NB	Stakeholders must be informed about SD procedure of national/multi-nationals organisations. NB needs to be informed about new multi-national SD.	Provide clear link to ENBOSS with necessary information on NAP for multi-nationals + information for non-digital SD for national organisations (including a data reference number)	National and multinational SP/DP knows how to hand in a self-declaration according to national conditions and ENBOSS conditions.	2.1
1.3	SP/DP	National or multi-national SP/DP has to fill in a SD. NAP supports digital self-declaration.	An authorized representative of the organisation fills in the required digital SD form per DR on the NAP.	Digital SD is registered on the NAP and marked as national or multi-national SD	1.4/1.5
1.4	NAP-operator	Multi-national SD was handed in (SD concerns more than one MS only). NB needs to be informed about new multi-national SD.	Sends digital SD to ENBOSS, NB will be informed about received multi-national SD	ENBOSS receives digital multi-national SD	2.1
1.5	NAP	National SD was handed in. National Body needs to be informed about received national digital SD.	NB will be informed about received SD.	NB received SD. (or information about SD)	End

Output(s) / Interface description

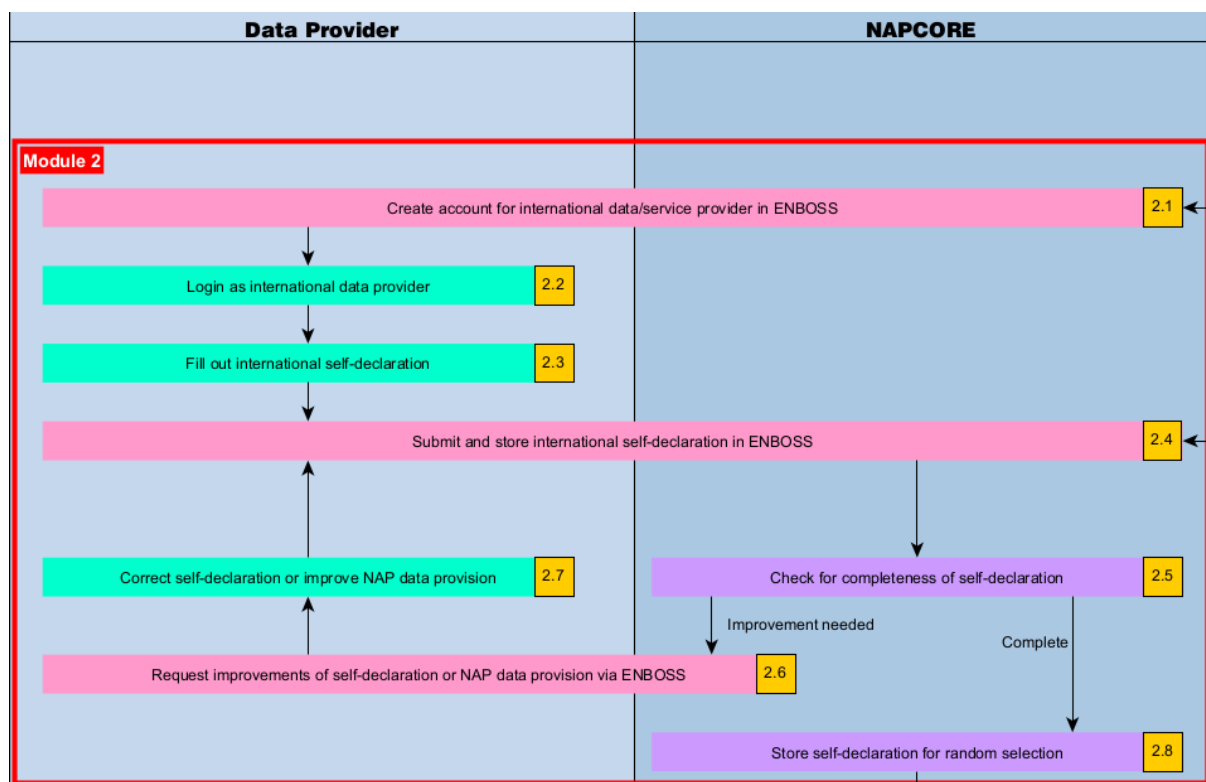
In what case?	Output description	Requirements/notes
The NAP offers a digital SD-functionality	The users submit a multi-national SD on the NAP. The NAP sends the multi-national digital SD to ENBOSS. This message would also include all information needed for ENBOSS to contact the submitter (=metadata on the organization and user). ➔ Module 2, case 1	ENBOSS should be capable of automatically retrieving (or receiving) the submitted SD from the NAPs that offer a digital SD-functionality (e.g. through harvesting).

The NAP does not offer functionality to submit digital SD	The multi-national user submits a digital SD on ENBOSS (link to ENBOSS at the NAP) ➔ Module 2, case 2	The link to ENBOSS on the NAP needs to be visualized and well explained to ensure users follow it.
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Observations during/after simulation and identified preconditions/issues

- The SD templates created by NAPCORE can be the basis for the digital SD-forms.
 - The submitter must be able to declare for which countries it is registering data and/or services and be informed that the necessary information will be shared with the different European NBs/CAs.
 - It should not be possible to submit a non-compliant SD (so option “No, I will not comply”) should not be possible.
 - The form should also contain a direct the link to the registered dataset(s) and/or service(s).
 - A unique identification connecting SD forms and NAP registered organisations is needed.
- A first example of a digital SD-form can be found in Annex I. No signature will be required for the digital SD as this would complicate the procedure very much (no EU-wide easy to implement digital signature solution exists).
- The NAP-operators will need to investigate how a digital SD-form can technically be integrated in their NAP. The digital SD-form should not be an external form (e.g. Microsoft forms, Google-forms).

Description of the simulated process – Module 2



Goal of this module



The goal of this module is to describe how a SD is submitted or received and then stored into the ENBOSS information system. The aim of this process is to ensure the compliance of SD and to prepare them for a random selection.

Once the self-declaration is submitted in ENBOSS, it will undergo an automatic completeness check. From there on, two options are possible:

1. **The SD requires improvements and/or additional information to be completed.** This means that NAPCORE will request improvements of the SD via ENBOSS. The data provider shall make the required adaptations and re-submit its international self-declaration to ENBOSS. From there on it will have to undergo a new automatic completeness check.
2. **The SD does not require improvements.** In this situation the SD is stored and may now be selected for a random selection for a compliance assessment.

Requirements and input(s)

Requirements

- Data holders should either have access to the NAP of the MS in which their headquarter is located (if the NAP offers a SD submission functionality) or an access to ENBOSS (if the NAP does not offer this functionality).

Input

- A formally complete SD form
- Input from Module 1

Process description

Step #	Who is actor?	Situation	Task	Outcome of task	Next step in process
2.1	SP/DP	The creation of an ENBOSS account is needed for international SPs/DPs to register their self-declaration	Create an account at ENBOSS	The account is created	2.2
2.2	SP/DP	Logging in required	Logs in to ENBOSS	SP/DP is logged in	2.3.
2.3	SP/DP	International SD needs to be filled in	Insert data to the SD form	SD recorded at ENBOSS	2.4
2.4.	ENBOSS	The international SD is submitted by the SP/DP at ENBOSS or The MS NAP, which offers a SD submission functionality (see previous module), submits the SD data automatically to the ENBOSS	Records SD data	SD is stored in the ENBOSS (accessible by NBs via ENBOSS)	2.5
2.5	ENBOSS	SD is referred for completeness checking	Performs an automatic completeness checking	SD completeness check is done. The results are shared with the SP/DP	2.6 (if the SD is not complete) or 2.8 (if the SD is complete)
2.6	ENBOSS	SD or NAP data provision needs improvements	Communicate to the submitter what improvements are	SD or NAP data provision has been rejected and further	2.7

			required for completion	amendments have been requested	
2.7	SP/DP	Request from ENBOSS for improvements regarding SD or NAP data provision	A corrected SD will be re-submitted and/or corrections on NAP data are made	The corrected SD is submitted and stored at ENBOSS and/or NAP data is corrected	2.4
2.8	ENBOSS	SD does not need improvements	Store SD for random selection	The formally complete SD is stored	Module 3

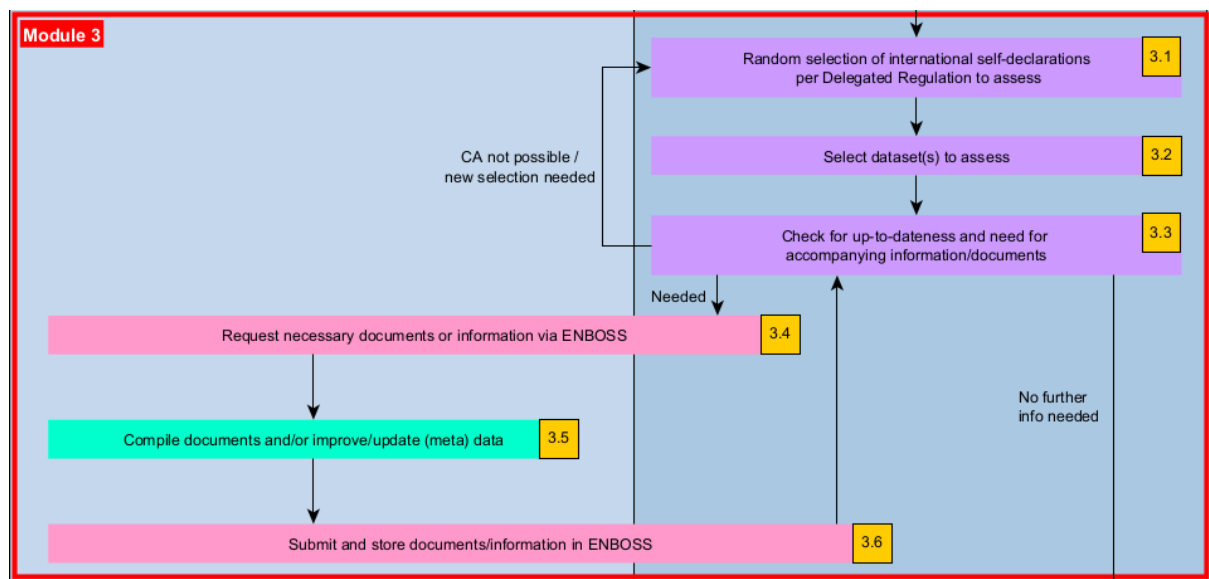
Output(s) / Interface description

In what case?	Output description	Requirements/notes
The MS NAP does not offer a functionality to submit self-declarations	Functionality that allows to direct the user via URL to ENBOSS using a web link on MS NAP home page in order to enter a self-declaration.	The link to ENBOSS needs to be visualized and explained well in the NAP to ensure users may follow it.
International SD needs to be filled in	ENBOSS shall clearly display the international SD template in order to allow data/service providers to complete it. A contact email should be added in case of questions or issues with the form.	There is a need for a SD form template.
The SD is submitted	A confirmation message should be sent to the data or service provider to inform them that the SD was well submitted.	A standardised confirmation message should appear after the SD is submitted.
The SD is formally completed	An email is sent to the SP/DP in order to inform them that the SD is stored for the random selection.	The email should inform the data or service provider about the next steps.
The SD is not formally completed	An email is sent to the SP/DP in order to highlight which parts are missing and/or need an improvement.	The email should be clear and underlining the parts requiring an improvement. The email should refer to a contact person.

Observations during/after simulation and identified preconditions/issues

It is recommended to submit the digital SD on the NAP where the service/data provider registers the data and thus already has a user-account and an organisation. Only if the NAP has no possibility for digital SD submission the stakeholder can submit it at ENBOSS.

Description of the simulated process – Module 3



Goal of this module

The goal of this module is to randomly select a self-declaration, request the necessary filled in accompanying documents from the stakeholder (if not yet available) and to perform the theoretical assessment.

- Per DR a predefined number of SD are randomly selected by NAPCORE.
- If an organisation has multiple datasets or services registered on the NAP (this information is available in the filled in digital SD (question 13), NAPCORE makes a selection of the datasets/services to assess.
- Once the to be assessed dataset(s) and/or service(s) have been selected, NAPCORE checks the following:
 - Is the self-declaration still up-to-date or should the provider update it? In the previous module (module 2) the self-declarations were already approved and checked for completeness. Therefore it can be assumed that all self-declarations stored in the ENBOSS system are most likely valid and that correct contact details of the stakeholders are available unless they changed in the period between submission of the SD and the random selection.
 - Is there is need for accompanying documents (AD) from the provider?
- ENBOSS informs the service or data provider that it has been selected for multi-national compliance assessment. If necessary, ENBOSS requests an update to the SD and/or the necessary AD (in English for multi-national CA) related to the SD from the stakeholder. The harmonized NAPCORE templates for the AD are used.
- The service or data provider submits the filled in AD to ENBOSS and/or makes the necessary corrections/updates to SD (within 3 weeks according to the harmonized CA process).
- ENBOSS stores the received documents/information in a correct manner.
- If NAPCORE found a self-declaration to be invalid, this is communicated to ENBOSS whom will mark the SD as “not valid” and removes it from SD storage. NAPCORE will in this case select a new SD of CA by means of random inspection.
- After receiving the improved documents from the provider via ENBOSS, the initial check of the provided information is redone by NAPCORE. This improvement circle will continue until all necessary information are provided by the stakeholder.

- If the SD is considered as up-to-date and all the necessary AD are available, NAPCORE performs a theoretical assessment of the AD (check on plausibility and completeness). If necessary, NAPCORE contacts through ENBOSS the provider to demand additional updates/corrections/documents.
- After a positive theoretical assessment of the AD, a more thorough content assessment can be performed on the selected dataset(s)/service(s). This is described in module 4.

Requirements and input(s)

Requirements:

- Access to stored self-declarations
- Possibility to contact stakeholders (correct contact details)
- If the SD is multi-national, the accompanying documents shall be in English

Inputs:

- Filled-in self-declaration form (stored in ENBOSS system)
- Necessary accompanying documents (to be provided by stakeholder or already submitted by stakeholder and stored in ENBOSS system)

Assumptions:

- Stored self-declarations or accompanying documents are possibly outdated and/or invalid
- Process for random selection is undertaken at least once a year per Delegated Regulation

Process description

Step #	Who is actor?	Situation	Task	Outcome of task	Next step in process
3.1	NAPCORE	SDs are available for random selection.	Perform random selection from the available international SDs according to the harmonized NAPCORE compliance assessment process.	One or more selected self-declarations (and thus identified organisations) per DR for CA-process	3.2
3.2	NAPCORE	Self-declarations for multinational CA are selected.	Select one (or more) dataset(s) and/or service(s) referred to by the SD for the compliance assessment	One or more identified dataset(s) and/or service(s) per SD	3.3
3.3	NAPCORE	The "to be assessed" dataset(s) and/or service(s) have been identified.	i. Check if info of SD is still up-to-date ii. Check if the necessary AD are available for the to be assessed dataset(s) and/or service(s) iii. If SD is up-to-date and AD available: perform theoretical assessment of the accompanying documents (check on	Outcome of Task 3.3 i, ii, or iii can be negative or positive. If all positive, the content assessment can start. If one of the outcomes is negative, input can be requested from the provider (corrections, accompanying doc's). In some cases the outcome of the 3.3	4.1 (overall positive outcome) or 3.4 (input needed from provider) or 3.1 (CA not possible for selected SD)

			plausibility and completeness).	checks is that the selected SD is not suitable for CA and a new SD has to be selected.	
3.4	ENBOSS	Input needs to be requested from SP/DP.	ENBOSS informs the provider that it has been selected for multi-national compliance assessment and requests missing or outdated information or documents.	Data or service provider receives request.	3.5
3.5	Data or service provider	SP/DP needs to provide or correct SD/AD.	Provider corrects information or documents on NAP or ENBOSS.	Incorrect information is corrected and/or the documents submitted.	3.6
3.6	ENBOSS	SP/DP submits the demanded (updates for) SD/AD and or corrections.	ENBOSS saves the received documents/updates. If necessary, invalid SD is marked as "not valid" and removed from SD storage.	ENBOSS receives corrected information or documents from provider.	3.3

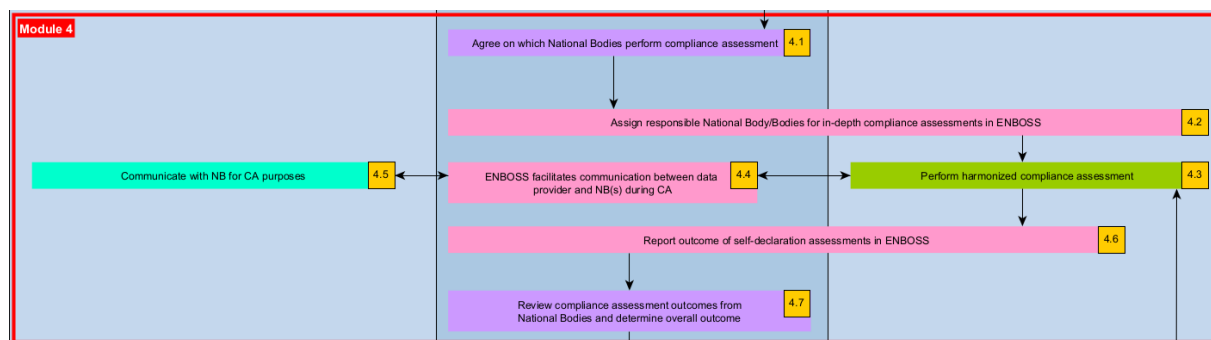
Output(s) / Interface description

In what case?	Output description	Requirements/notes
Stakeholder needs to be contacted by ENBOSS	ENBOSS sends e-mail to inform about compliance assessment and request to the stakeholder to demand AD, corrections or updates.	Correct contact information of the stakeholder is needed. The email to the stakeholder should be clear underlining the necessary actions requested.
ENBOSS needs to be able to receive documents from stakeholder	ENBOSS must be able to receive and store the AD from the stakeholders.	Upload function as well as storage capacity on ENBOSS website is needed.
Stakeholder has questions for ENBOSS	ENBOSS needs to be contacted by stakeholder for a general enquiry or for a specific question	Contact interface for ENBOSS is needed (ENBOSS mailbox)
NAPCORE needs to inform ENBOSS about non-valid SD	If NAPCORE finds a SD to be invalid, this must be communicated to ENBOSS so that it can be marked as "not valid" and be removed from the SD storage.	

Observations during/after simulation and identified preconditions/issues

- ENBOSS mailbox needed also for **general** enquiries.
- Even though the digital SD is verified and approved at the moment of submission in module 2, it may not be valid anymore at the moment that it is selected for random selection. It is therefore necessary to include a check if the SD is up-to-date in step 3.3 before requesting the necessary AD.

Description of the simulated process – Module 4



Goal of this module

The objective of this module is to initiate a process for an in-depth compliance assessment (= content assessment) in an international context. The module begins by selecting which National Bodies (NBs) will perform the compliance assessment. Once the NBs are selected, the responsibility for assessing specific self-declarations (SDs) is formally assigned to them. The designated NBs then carry out the harmonized compliance assessments by verifying the data's compliance with the Delegated Regulations, ensuring accuracy, timeliness, and completeness, and identifying any potential discrepancies. Finally, ENBOSS consolidates the assessment results and forwards them to the European NB Group for review.

Requirements and input(s)

- Digitally submitted SDs available in the ENBOSS
- Information and result stored in ENBOSS from the previous Module (3)
- Knowledge of the compliance assessment process as defined by NAPCORE
- Harmonized template for recording results
- European NB Group (for reviewing results)

Process description

Agree on which National Bodies perform compliance assessment (4.1):

All NBs of all affected countries are invited to carry out the CA on a voluntary basis. Agreement on National Bodies (NBs) on a voluntary basis to conduct in-depth compliance assessments of SDs previously flagged in Module 3. The selected NBs are informed, and their roles and responsibilities for assessing the SDs are confirmed. Once the selection is complete, the process moves to the next phase.

Assign responsible National Bodies for in-depth compliance assessment (4.2):

ENBOSS formally assigns the selected NBs to the specific SDs. Each NB has access to the necessary documents such as the SD, the ADs and the most recent versions of the harmonized templates and methodological guidelines. This step ensures that the NBs are fully equipped and informed about their tasks. Each assigned NB carries out the CA focusing on the data regarding their MS(s)

Selected NB performs the CA of the SD (4.3):

The designated National Bodies carry out a detailed compliance assessment of the SDs for the selected datasets (=output of module 3.2) based on the harmonized CA procedure established by NAPCORE. This process includes verifying the compliance of the data with the relevant Delegated Regulations, checking the accuracy, timeliness, and completeness of the provided information, and identifying any discrepancies or non-compliance issues. The results of these assessments are recorded using the harmonized templates.

ENBOSS facilitates communication between DP and NB s during CA (4.4):

If communication between the DP and the NBs needs to be ensured regarding the initiation of cooperation for the assessment process, ENBOSS will facilitate this communication.

NB will if needed communicate with SP/DP (4.5):

If further communication is needed during the assessment phase of the NBs with the SP/DP, this is facilitated by ENBOSS. While this could be a purely bilateral communication between each NB and the SP/DP, by using ENBOSS one could ensure that e.g. not all assessing NBs need to ask for the same clarifications from the SP/DP.

Report Outcomes of Self-Declaration Assessment in ENBOSS (4.6):

If there is no need for further feedback from the DP, the NB/NBs will submit the results of the assessments to ENBOSS for review.

Review compliance assessment outcomes from NB/ NBs and determine harmonized outcome (4.7):

ENBOSS collects all assessment results from the participating NBs and forwards them to the European NB Group for a final review. This review ensures consistency across all assessments, validates adherence to harmonized standards, and highlights potential areas for improvement in the assessment process. Once the review is complete, the consolidated results are recorded in the ENBOSS system as a common, overall result and prepared for further processing.

Step #	Who is actor?	Situation	Task	Outcome of task	Next step in process
4.1	European NB group	Agreement on NBs for in-depth compliance assessment has to be made	Agree on which NBs carry out compliance assessment	One or more NB/ NBs have agreed to carry out in-depth compliance assessment	4.2
4.2	ENBOSS	The responsible NB/NB's for in-depth compliance assessments have to be formally assigned in ENBOSS	The agreed upon NB(s) for the in-depth CA are formally assigned in the ENBOSS-system. ENBOSS sends the necessary information to the selected NB/NBs	NB(s) for the in-depth CA are formally assigned in the ENBOSS system. The NB(s) receive the necessary information from ENBOSS.	4.3
4.3	Selected NB/NB's	NB/ NBs need to perform the in-depth CA	NB/NBs perform harmonized compliance assessment for the selected datasets (input from step 3.2) If necessary, a NB can communicate with the SP/DP via ENBOSS.	In depth CA is performed. The NB(s) communicate via ENBOSS with SP/DP if necessary. The results of the CA are reported in the harmonized template.	4.4 (if communication with SP/DP is needed) or 4.6 (If no need further communication is needed)

4.4	ENBOSS	Communication between DP and NB(s) is ensured.	If required, ENBOSS facilitates the communication between the NB and the SP/DP during CA	A centralized communication method between the NB(s) and selected SP/DP is used for exchanging the necessary information for the CA.	4.3, 4.5
4.5	SP/DP	The SP/DP communicates with ENBOSS	The SP/DP communicate with ENBOSS for CA purposes.	SP/DP are informed by NB	4.4
4.6	ENBOSS	The individual results from the CA by the NB(s) have to be reported to and stored in ENBOSS	Report and store outcomes of the individual CA-results in ENBOSS	The report(s) are submitted in ENBOSS	4.7
4.7	European NB group	Determine an overall outcome	European NB group review the individual CA results and determine the overall outcome of the CA	NBs are informed about the overall outcome	5.1

Output(s) / Interface description

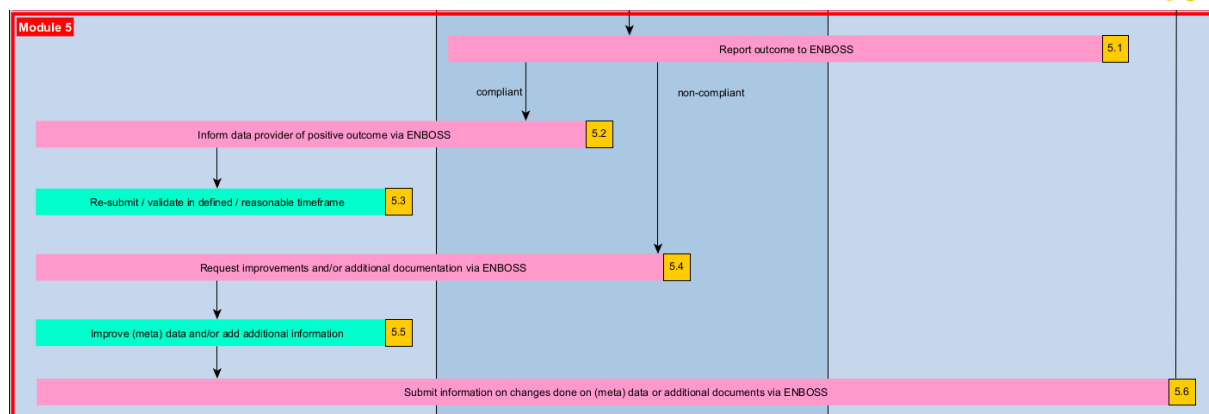
In what case?	Output description	Requirements/notes
Agree on NBs for compliance assessment	ENBOSS confirms roles of NBs	Clear documentation of NB responsibilities.
Assign NBs to specific SDs	ENBOSS provides detailed instructions ENBOSS sends e-mail request to the affected NB	All countries mentioned in the SD by the service provider are invited to carry out CA for selected
Conduct in-depth compliance assessment	NBs submit results to ENBOSS	Harmonized compliance assessment is completed, harmonized templates are filled-in
Consolidate and review results	European NB Group provides feedback	Space for suggestions and further improvement.

Observations during/after simulation and identified preconditions/issues

- **Resource availability at NBs:** Some NBs may lack the resources (staff or technical expertise) to complete the assessments within the required timeframe, potentially causing delays.
- Establish clear review criteria: Develop harmonized guidelines and criteria to evaluate and consolidate the assessment outcomes provided by the National Bodies (NBs)
- Establish a protocol for handling discrepancies in assessment results: This could involve re-assessment by a neutral NB or further deliberation within the European NB Group.
- Automated tools for consistency: Use automated tools or algorithms to compare outcomes against harmonized benchmarks.
- ENBOSS should decide on a “Single Result for the Multinational Compliance” after the feedback from the review from the European NB group. This might pose challenging if outcomes vary greatly between MS.

Description of the simulated process – Module 5





Goal of this module

The goal of this module is to provide information to the SP/DP on the result of the conducted compliant assessment.

Requirements and input(s):

- Contact National Bodies
- Contact of assessed organizations
- Access to a harmonized outcome of compliance assessment in ENBOSS

Process description

Module 5 outlines a structured process for handling the outcomes of compliance assessments (CA) related to data/service providers. Here is a step-by-step overview of the process:

Outcome Reporting (5.1): After performing the CA process, ENBOSS receives a report from the chosen NBs about the results of CA and records the outcome. This overall result is stored in the ENBOSS system.

Result – “compliant” (5.2): If the outcome is positive (“compliant”), ENBOSS takes the initiative to communicate this positive feedback to the data and/or service provider. This reinforces compliance and good practices.

Resubmission (5.3): The data and/or service provider need to resubmit or validate their data and SD(s) in a reasonable timeframe.

Result – “non-compliant” (5.4): If the outcome is negative (“non-compliant”), ENBOSS communicates the negative feedback to the data and/or service provider and requests them to make the necessary corrections and/or submit additional documentation to ENBOSS.

Submission of Improvements (5.5): In response to the improvement request, the data and/or service provider receives the communication and, within a reasonable timeframe, submits updated documents and improvements to ENBOSS.

Submission of Changes (5.6): Finally, the data and/or service provider communicates the changes made regarding their data, metadata, and documentation back to ENBOSS. This confirms that the feedback has been acted upon and allows the selected NBs to verify the improvements.

Step #	Who is actor?	Situation	Task	Outcome of task	Next step in process
5.1	NBs / ENBOSS	ENBOSS receives information about the overall outcome of CA for randomly selected SP/DP.	The overall outcome is reported and stored in ENBOSS.	ENBOSS stores the overall outcome.	5.2 if the outcome is “compliant” 5.4 if the outcome is

					"non-compliant"
5.2	ENBOSS	The result of CA is "compliant".	Informing SP/DP on the positive outcome of the CA and asks the SP/DP to re-submit / validate the data within a reasonable timeframe.	ENBOSS sends the positive feedback to the SP/DP.	5.3
5.3	SP/DP	The organisation / data set / service has been deemed compliant.	SP/DP after a reasonable timeframe re-submits / validates the data / SD.	SP/DP is ready to be re-assessed	-
5.4	ENBOSS	The result of CA is "non-compliant".	Via e-mail, ENBOSS informs the SP/DP of a negative outcome of CA and request improvements and/or AD via ENBOSS.	ENBOSS sends negative feedback to the SP/DP as well as a request for improvements.	5.5
5.5	SP/DP	SP/DP receives request for improvement of the (meta)data and/or additional documentation from ENBOSS.	After receiving the request, the SP/DP should make the necessary corrections and send the updated documents in a reasonable timeframe.	Requested improvements are being made and/or AD are sent to ENBOSS.	5.6
5.6	ENBOSS	Update from the SP/DP has to be stored in ENBOSS and has to be validated by the selected NBs	ENBOSS stores the newly received documentation and the information about the corrections being made and communicates this to the selected NBs	The selected NBs receive the information about the changes and repeat the harmonized CA process.	4.3 (NB can now perform a new CA)

Output(s) / Interface description

In what case?	Output description	Requirements/notes
ENBOSS receives a report from NBs regarding the results of the CA.	ENBOSS contacts data and/or service provider about the results via e-mail.	The contact information for ENBOSS should be accessible on the website.
The result of the CA is "compliant".	ENBOSS sends a positive outcome to the data and/or service provider and informs the provider to re-submit / validate the data in a reasonable timeframe.	The contact information for data and/or service provider should be available to the ENBOSS.
The result of the CA is "non-compliant".	ENBOSS sends a negative outcome to the data and/or service provider and informs the provider to improve (meta)data or to send additional information.	The contact information for data and/or service provider should be available to the ENBOSS.
Data and/or service provider submits information on changes or additional information.	After making changes to their (meta) data or other requirements set by ENBOSS, the data and/or service provider sends this information to the selected NBs that initially performed the CA process.	The information on required changes or information is sent to NBs.

Observations during/after simulation and identified preconditions/issues



- The communication of the compliance assessment results to the Member States should be considered within this module.

Next steps and considerations

- **Conduct a feasibility study:** This should be done before the ENBOSS implementation process is started. The study will aim to evaluate the next steps focusing on technical, operational, and financial factors. During the study, a comprehensive SWOT analysis (or similar) should be conducted to identify the strengths, weaknesses, opportunities, and threats associated with the project. Additionally, it will assess the availability of critical resources, including technical infrastructure, human resources, and funding, to determine whether the necessary support systems to implement ENBOSS are in place.
- **Perform legal analyses:** These analyses will support existing and newly established National Bodies in implementing the NAPCORE recommendations on Compliance Assessment. They will clarify legal frameworks, ensure compliance with EU regulations, and address cross-border legal considerations essential for ENBOSS operations.
- **Draft Reference Architecture documentation:** Directly aligns with the support for the implementation of the National Body Reference Architecture in the Member States by providing a foundational framework (building upon M5.9) that guides the technical and organizational structures needed for ENBOSS.
- **Create a draft plan for a development project:** Facilitates the further conceptualisation, development, and implementation of ENBOSS by outlining the roadmap, resource allocation, risk-analysis and key milestones necessary for project success.
- **Identify and describe/detail the responsibilities of the different roles/parties involved:** Enhances the continuous maturity level assessment of National Bodies and exchange of experiences by clearly defining roles, ensuring accountability, and promoting consistent practices across EU.
- **Set up of a migration plan towards the use of ENBOSS:** Provide operational support to existing and newly established NBs to promote and foster harmonisation by addressing the following questions: How to start using ENBOSS? What are the changes needed on NB level and for ENBOSS? How is the organisation between those NBs that are participating in ENBOSS and those that are not handled? What happens to international organisations where some countries/NBs use ENBOSS and others do not?
- **ENBOSS functionality to send notifications to NBs:** This important feature enhances communication with multinational stakeholders on behalf of multiple/all NBs by ensuring timely updates to relevant NBs when new digital Self-Declarations (SDs) are submitted, improving coordination and responsiveness.
- **To be considered:** Possibility for user registration for the provision of accompanying documents in the case that the original SD submission was done at a NAP and not via ENBOSS.
- **To be considered:** situation if no NB volunteers to perform the CA of the randomly selected SD.

Question addressed: what if not all countries participate?

The data provider cannot request the assessment of SD and CA for EU member states that are not members of the ENBOSS system. There must be trust between the different NBs toward ENBOSS. There must be commitment of the NB to perform the assessments in the foreseen timeframe.

Annex 1: Template MMTIS Self Declaration form

Introduction

This is an example of template for self-declarations for compliance with the Delegated Regulation (EU) 2024/490 of 29 November 2023 amending Delegated Regulation (EU) 2017/1926 supplementing Directive 2010/40/EU of the European Parliament and of the Council with regard to the provision of EU-wide multimodal travel information services.

This template was developed by XXXX.

Each NAP should set up a similar template.

Template

1. Organisation contact details

1. Main trading entity (company name)
2. Trading name (company name abbreviation)
3. Address Headquarters (street + number, postal code, city, country)
4. Registered at (national registry of companies or similar)
5. Registry number
6. Authorized representative (first name, last name)
7. Email

2. Compliance with static travel and traffic data (link to DR - art4: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32017R1926&qid=1691756155521#d1e658-1-1>).

My organisation complies with the requirements set out in article 4 for the provision of static travel and traffic data

- ☐ Yes

3. Compliance with dynamic travel and traffic data (link to DR - art5: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32017R1926&qid=1691756155521#d1e741-1-1>).

My organisation complies with the requirements set out in article 5 for the provision of dynamic travel and traffic data

- ☐ Yes

4. Data is provided for following countries:

- ☐ AT
- ☐ BE
- ☐ BG
- ☐ CH
- ☐ CY
- ☐ CZ
- ☐ DK
- ☐ DE
- ☐ EE
- ☐ IE
- ☐ EL
- ☐ ES



- ☐ FI
- ☐ FR
- ☐ HR
- ☐ HU
- ☐ IT
- ☐ LV
- ☐ LT
- ☐ LU
- ☐ MT
- ☐ NL
- ☐ NO
- ☐ PL
- ☐ PT
- ☐ RO
- ☐ SI
- ☐ SK
- ☐ SE
- ☐ UK

5. My organisation provides the data within the scope of its role as:

- ☐ Transport authority
- ☐ Transport operator
- ☐ Infrastructure manager
- ☐ Proxy

6. Compliance of my organisation

My organisation complies with Article 3 (4) on the provision of metadata (link to article)

- ☐ Yes

My organisation complies with the requirements set out in Article 6 with regard to updating data and correcting any data inaccuracies detected (link to article)

- ☐ Yes

My organisation complies with the provisions referred to in Article 8 with regard to reuse of travel and traffic data and linking of travel information services, if applicable (link to article)

- ☐ Yes

My organisation registered following dataset(s) and/or service(s) on the NAP in order to comply to the DR MMTIS: *[Copy the URL-link of the dataset(s)/service(s) on the NAP]*

7. Cooperation with competent authorities

My organisation will cooperate with the concerning national competent authorities (see question 4) for the compliance assessment. Organisations can randomly be selected by the national competent authorities to inspect whether they are compliant with the requirements set out in the Articles 3 to 8. In the course of the compliance assessment, all data, records and relevant accompanying documents (link to the accompanying documents) required for the execution must be made available free of charge and without restrictions and this within the time span of 1 month.

My organisation also agrees on that the necessary information of this digital self-declaration is shared with the different European national competent authorities.

- ☐ Yes

8. Up-to datedness of the data



My organisation will ensure that this self-declaration is up to date and valid and in case of any change that necessitates an update will update this digital self-declaration in a timely manner.

- ☐ Yes

9. Optional information or remarks:



Annex 2: Requirements from the perspective of National Bodies for semi-automated support tools or the electronic implementation of CA processes and forms

Introduction

This document serves as an **annex to M5.10 - Multi-National Compliance Assessment** and defines the **requirements for the development of a semi-automated system** to support a **more efficient, transparent, and interoperable process for Compliance Assessment (CA) and the validation of Self-Declarations (SD) within NAPCORE.**

The main goal of this system is to **reduce the administrative burden on National Bodies (NB), ensure harmonization of the compliance assessment process across EU Member States, and enhance coordination between NB and ENBOSS.** The system will **combine automated and digital processes** – performing automated validation and selection of SDs for inspections, while key decision-making remains with NB.

As next step in system design, a structured questionnaire will be developed, which will be distributed among NB within NAPCORE. This questionnaire will be used to **validate requirements, determine functionality priorities, and collect feedback on national specifics of Compliance Assessment (CA) process.**

Objectives and Expected Benefits of the System

Key objectives of the semi-automated system:

- **Simplification of SD submission and management** – a unified environment for SD registration and metadata recording.
- **Automated validation of SD** – the system performs basic format and structure validations.
- **Support for NB in Compliance Assessment** – digital tools for manual validation, inspections, and reporting.
- **Harmonization of the CA process across NB** – sharing of inspection results and Compliance Reports among Member States.
- **Integration with NAP and ENBOSS** – linking to external platforms for interoperability.

Benefits for key stakeholders:

- **For NB** – reduced administrative burden, faster decision-making, improved oversight of SDs across the EU.
- **For Data Holders** – clearer SD requirements, a simpler submission and validation process.
- **For the European Commission (EC)** – a unified Compliance Assessment system across the EU, better compliance monitoring.

Key Functional Requirements of the System

The semi-automated system could be designed to support **the following functions, divided into key phases of the CA process.**

Difference Between Digital and Automated Functionality

- **Digital functionality** – Processes requiring **active user interaction** (e.g., login, manual SD validation, escalation of decisions).
- **Automated functionality** – Processes executed **without user intervention**, based on predefined rules (e.g., formal validation of SDs, automated selection of inspections).
- **Manual activities** – Actions performed **directly by NB**, in cases where automated analysis is insufficient (e.g., SD content review, escalation of inspections).

Phase	ID	Function	Description	Automation Level	Key Users
 1. Submission of Self-Declarations (SD)	F1	Authentication and System Access	User login based on roles (NB, Data Holders)	Digital (user roles, access control)	NB, Data Holders
	F2	Self-Declaration (SD) Submission	Data providers submit SD or provide a reference to data storage	Digital (SD form, metadata entry)	Data Holders
	F3	Automated Validation of SD	Verification of format, metadata, and required SD fields	Automated (system validation, format checking)	NB, ENBOSS
	F4	Manual Review of SD (if needed)	NB performs SD content validation if automated validation is insufficient	Manual (metadata check, review process)	NB
 2. Multi-National Compliance Assessment (CA)	F5	Storage and Versioning of SD	The system maintains a history of SD submissions and revisions	Digital (database versioning, audit logs)	NB, ENBOSS
	F6	Generation of Compliance Reports	Automatic evaluation of SDs based on validation and inspections	Automated (system-generated PDF/XML reports)	NB, EC
	F7	Assignment of SDs for Multi-National Review	If an SD applies to multiple countries, ENBOSS coordinates CA allocation	Automated (system assignment, NB coordination via ENBOSS)	NB, ENBOSS

Phase	ID	Function	Description	Automation Level	Key Users
 3. Random Inspections and Escalations	F8	Automated Selection of SDs for Inspection	The system selects SDs for random inspection based on criteria	Automated (selection algorithm, NB prioritization)	NB
	F9	Recording of Inspections	Logging of inspection results and their impact on Compliance Reports	Digital (workflow tracking, audit logs)	NB, ENBOSS
 4. Reporting and Interoperability	F10	Integration with NAP and ENBOSS	Standardization of data and APIs for interoperability with other systems	Digital (API integration, XML/JSON exports)	NB, NAP, ENBOSS
 5. Rule Management and User Access	F12	Automated Evaluation of Regulatory Changes	The system monitors regulatory updates and evaluates which SDs need revision	Automated (rule updates, system analysis)	NB, Data Holders

System Interconnections with Other Platforms

- **NAP** – Verification of the availability of data declared in SDs.
- **ENBOSS** – Central coordination of multi-national Compliance Assessment.

Next steps

Collection of Information from NB Participating in the NAPCORE Project

Objective: Identify key requirements from NB regarding the functionalities and usability of the semi-automated system.

Development of a Structured Questionnaire for NB

- **Prepare a detailed questionnaire** to be distributed among NB within NAPCORE.
- Ensure that the questionnaire covers:
 - **Current processes** for managing and accessing SD.
 - **Challenges in Compliance Assessment (CA)** and areas that require automation.
 - **Expectations regarding interoperability** with NAP and ENBOSS.
 - **Prioritization of system functionalities** from an NB perspective.

Distribution and Response Collection

- The questionnaire will be **distributed to all participating NB** via the established NAPCORE communication channels.
- Responses will be collected and analyzed to identify **common pain points and national-specific requirements**.
- A synthesis report will be created summarizing key findings.

Synchronization with deliverables from Other Work Packages (WP2, WP4, etc.)

Objective: Ensure that the semi-automated system is aligned with the broader objectives and technological developments of the NAPCORE project.

Collaboration with WP2 (Harmonization of NAPs and Data Exchange)

- Align the system requirements with WP2's **efforts to harmonize National Access Points (NAPs)**.
- Ensure that SD metadata structures are **compatible with the standardized formats used in NAPs**.
- Validate **data exchange mechanisms** between NB, NAP, and ENBOSS.

Integration with WP4 (Data Quality and Monitoring)

- Incorporate WP4 findings related to **data validation, quality control, and monitoring**.
- Ensure that the semi-automated system supports **automatic verification of SD metadata** and enables NB to track **the quality of compliance over time**.
- Define **standardized metrics for evaluating SD compliance**, to be used in **Compliance Reports**.

Technical Coordination with WP5.9 (NB Reference Architecture)

- Ensure that the system architecture follows the **reference framework developed in WP5.9**.
- Validate the system's **modular approach** so that it can evolve alongside other NAPCORE technological developments.
- Ensure that **interoperability requirements for multi-national CA processes** are fully addressed.

Technical Feasibility Assessment and Drafting the System Specification

Objective: Define the **technical architecture and key implementation milestones** based on the collected requirements.

System Functional Specification

- Define **system workflows** for SD validation, Compliance Assessment, and Reporting.
- Establish **data governance principles** to ensure NB retain control over compliance processes.
- Define the **rules for automatic validation and manual verification workflows**.

API and Data Integration Model

- Define API endpoints for **NB interaction with NAP, ENBOSS, and the Compliance Assessment system**.

- Ensure **compatibility with existing NAP APIs** for SD metadata retrieval.
- Develop a **secure authentication model** to manage NB and Data Holder access.

Prototype Development and Initial Testing

- Based on the specification, **prepare a prototype implementation** to test the core functionalities.
- Conduct **initial tests with selected NB** to validate **user interface usability and system logic**.
- Incorporate **feedback into an iterative development cycle**