Purpose: The purpose of this document is to provide guidance to all stakeholders on the procedures related to user accounts reconciliation, and should be read in conjunction with FPD Standard Operation Procedures No 1 (FPD-SOP001) – User Access Rights Management. In line with recommendations received from the auditors, the processes related to user accounts reconciliation will now be done electronically through the system.

Scope: This document explains the process of granting rights to data group owners to conduct reconciliation, and the process by which the owners are to perform the reconciliation.

Background: The Funds and Programmes Division Funding Systems (MSIS 1420, EMFF 1420, CARS1421) are the backbone information systems used to manage EU funding and Bilateral funding in Malta. The systems are accessed by users from different stakeholders including the Managing Authority, Beneficiaries, Line Ministries, EU Payments Unit, Audit Authority and Certifying Authority.

Responsibilities: Head of Managing Authority¹
Chief Coordinators and Directors
Managing Authority Personnel
Heads of Key stakeholder organisations
Project Leaders
Coordination: ICT Unit

Issuing Authority: Funds and Programmes Division – ICT Unit

Effective Date: 04/10/2021

Procedure:

1. Assignment of Data Group Owner

1.1. Each system data group will be assigned one owner. The data group owner is responsible to ensure that a user who has access to the data is kept updated regularly in line with data protection and security obligations.

¹ Managing Authority shall also refer to Responsible Authority / National Focal Point.
1.2. Information on data group owners may be provided to the auditors and the European Commission.

1.3. Data group owners are assigned as follows:
   a) Managing Authority – Director General, Chief Coordinators and Directors;
   b) Intermediate Body – Head of Intermediate Body;
   c) Audit Authority – Director General;
   d) Certifying Authority – Chief Coordinator;
   e) EU Payments Unit – Chief Coordinator;
   f) Line Ministry – Director Programme Implementation (or equivalent role within the Ministry); and
   g) Beneficiary – Project Leader²

2. Frequency of the Reconciliation Exercise

2.1 The guidance of SOP 1 – User Access Rights Management, section 4.0 Review of Accounts, apply to the reconciliation exercise.

2.2 At least once a year, the Managing Authority will conduct a reconciliation exercise of all user accounts, coordinated by the ICT Unit.

2.3 The Managing Authority reserves the right to revoke system access to data groups which are not reconciled by the respective organisation.

3. Reconciliation Procedure

3.1 At the start of the reconciliation procedure, the data group owner will receive a system generated email indicating the active users linked to the data group.

² Where a Project Leader provides a general Delegation of Authority to other users, such Delegation of Authority is not applicable to the reconciliation exercise. In case a Project Leader would like to delegate this function, a specific Delegation of Authority would be required.
3.2 The email will contain information on how to login the system and how to proceed to the Users Reconciliation page under the Administration menu where the user then selects the data group from the drop-down menu and of which access needs to be confirmed or revoked accordingly.

3.3 During reconciliation, the person responsible for each data group will either:
   a) confirm that users linked to the data group still require access to the system, or
   b) revoke accesses that are no longer required.

3.4 Suspended accounts, i.e. accounts which are Active but the user has not logged into for a long time, will be shown in red, thereby assisting the data group owner in deciding whether access is still required.

3.5 Once the data group owner presses the “Submit” button, the reconciliation exercise is automatically recorded. A message that the reconciliation has been saved is displayed to the user, and the table updated accordingly.

3.6 Data group owners may use this facility at any time to check and update user rights.

3.7 Any other changes to the user accounts, e.g., changes in Web Groups, may be done as indicated in FPD Standard Operating Procedures No 1, section 2 – Modification of User Access Rights.

4. Implementation

4.1 This SOP will come into effect immediately, with the release of MA Circular 01/2021

Modification history

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