Operational Procedures

Issue Reporting and Management

Version: 1.0
Approved: 15 February 2022

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Version control

Version	Date	Comments
1.0	15.02.2022	Approved by the OpenPeppol Managing Committee (MC161 meeting)

List of Terms and Abbreviations

Term	Definition
MC	OpenPeppol Managing Committee
OO	OpenPeppol Operating Office
PA	Peppol Authority
PCA	Peppol Coordinating Authority (OpenPeppol AISBL)
PKI	Public Key Infrastructure
RFC	Request For Change
SMK	Service Metadata Publisher Simulator used for Testing
SML	Service Metadata Locator
SP	Peppol Service Provider

The procedures included in this document expand on the legal obligations assumed through the Peppol Agreements, and the rules and provisions in the OpenPeppol AISBL Internal Regulations for Use of the Peppol Network.

This Operational Procedure provides operational details for the implementation of the Peppol Agreements and the Policies contained in the OpenPeppol AISBL Internal Regulations for Use of the Peppol Network.

In case of any doubt or the appearance of conflict, the Peppol Agreements shall take precedence over the Policies contained in the OpenPeppol Internal Regulations for the Use of the Peppol Network and these will take precedence over the OpenPeppol Operational Procedures.

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1 Purpose

This document sets out the processes and procedure for reporting, managing, and resolving issues which affect the Peppol Network, including:

1. Interoperability issues,

2. Security incidents,

3. Information breaches or loss/compromise of data,

4. Peppol infrastructure issues (e.g. SML, SMK, Peppol Directory, Test Bed, PKI infrastructure), or

5. Any other issues with the Peppol Interoperability Framework.

A key objective of this procedure is to minimise business impacts to End Users.

Out of scope

- **Non-compliance** – Actual or suspected non-compliance is to be managed following the Non-compliance Management Operational Procedure.

- **Improvements/refinement** – Improvements or refinements to the Peppol Interoperability Framework are managed via the Change Management Operational Procedure.

  Resolution of issues can lead to identification of proposals for change. For example, resolving a difference in interpretation can lead to a need to update documentation, or resolving a security incident can identify the need to strengthen security requirements.

- **Pro-active detection** – Governance mechanisms to actively monitor for early detection of potential issues, or compliance with obligations is part of the risk management framework of the Peppol Coordinating Authority.

- **Service Requests** – Requests to initiate an action which has been agreed as part of normal service delivery (i.e. issue new test certificate, etc).

2 Introduction

Issues can cause problems for participants (including SPs and End Users), ranging from minor irritants, corruption of data, to disruptions affecting the entire Peppol Network.

The active management of issues safeguards all Peppol participants and reduces risks to the reputation of OpenPeppol and the Peppol Network. Transparent and structured procedures support the effective and timely management and resolution of issues.

All participants are required to cooperate in the resolution of issues in the Peppol Network, including providing reasonable assistance with any investigations, and actions

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to resolve issues, including temporary measures to restore interoperability or otherwise mitigate impacts to participants. This recognises the high level of interdependency of all participants in a network environment.

3 Process Overview

The following table provides an overview of the key process steps. The table is a general representation of the process flow; some steps can be undertaken in parallel and do not need to be completed in strict order.

	Step	Description	Responsibility
1	Raise with Party	Parties should aim to resolve issues informally between themselves in the first instance.	Relevant parties
2	Report issue	Where Participants need assistance, report the issue to the PA or OO	Service Providers / Peppol Authority
3	Peppol Authority Assessment	The issue is assessed on its priority and whether it should be escalated immediately to OpenPeppol.	Peppol Authority
4	Peppol Authority Investigation	An investigation is conducted to understand the issue and consult on possible solutions.	Peppol Authority
5	Peppol Authority Resolution	Action is taken to resolve the issue. The issue is monitored through to resolution.	Peppol Authority
6	Escalate to OpenPeppol	When the Peppol Authority cannot resolve an issue, OpenPeppol provides second level support through the Peppol Service Desk.	Peppol Authority
7	OpenPeppol Assessment	The issue is assessed on its priority.	OpenPeppol Operating Office
8	OpenPeppol Investigation	An investigation is conducted to understand the issue and consult on possible solutions.	OpenPeppol Operating Office / Peppol Authorities
9	OpenPeppol Resolution	Action is taken to resolve the issue. The issue is monitored through to resolution.	OpenPeppol Operating Office / Peppol Authorities

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4 Procedures

4.1 Raise with party

Where the issue is limited to interactions between one or few parties, these parties are encouraged to work together to resolve the issue/s. Where the party is contracted through an intermediary, the intermediary should be contacted, if they can be identified. If the intermediary cannot be identified, contact the party's Service Provider.

This recognises that many issues may be unintentional or inadvertent (e.g. as an unforeseen and unintended outcome of a system update) and often the fastest way to resolve issues is to do so directly with the other participant.

Note: some issues must always be reported, even if they are resolved or under management. These include issues of a serious nature or those that have potential impact to the broader Peppol Network, reputation, or legal risks (e.g. security incidents, information breaches/data loss, or issues that may affect a large number or participants).

4.2 Report issue

When to report an issue:

1. When the issue cannot be resolved with the parties to an issues, or

2. In some cases, even when the issue can be resolved or is under management - where the issue is of a serious nature or has potential impact to the broader Peppol Network, reputation, or legal risks (e.g. security incidents, information breaches/data loss, or issues that may affect a large number or participants).

Where to report the issue:

If you are an end user or an intermediary

1. to your Peppol service provider

If you are a Peppol service provider

1. to the PA with whom they have signed their SP Agreement or

2. to the PA in the jurisdiction the issue is, or

3. directly to OpenPeppol through the Peppol Service Desk. This pathway has been acknowledged by PAs as the most logical pathway for centralised issues which may require resolution within a critical timeframe.

How to report an issue:

1. When reporting to a PA, the reporting must be done through any mechanism advertised by the PA.

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The SP must complete the template in **Attachment A** and provide it to the PA.

2. Where OpenPeppol is acting as the PA for the SP the issue must be submitted as an Issue Report through the Peppol Service Desk

3. SPs reporting to OpenPeppol should proceed to the 'Escalate to OpenPeppol' step of this procedure.

The PA will:

1. Record the issue in an issue register.

2. Notify the SP that the issue has been recorded on the issues register.

4.3 Peppol Authority Assessment

The PA (including the OpenPeppol Operating Office (OO) where OpenPeppol is acting as the PA) will:

1. Determine the priority of the issue.

   The PA will prioritise the issue as either:

   a. Critical – consider immediate escalation to OpenPeppol

   b. Urgent

   c. Timely

   d. Convenient

   The PA will take into account the following factors to determine the priority:

   a. The SP's prioritisation of the issue (the PA has the discretion to change the priority of the issue).

   b. Impact or potential impact to:

      i. Peppol participants.

      ii. Interoperability.

      iii. Network integrity.

      iv. Reputation.

      v. Security.

      vi. Compliance with laws or regulations.

   c. Any other factors the PA considers relevant.

2. Determine whether to escalate to OpenPeppol.

   Peppol Authorities provide support to SPs. However, issues which have wider impact need to be escalated OpenPeppol, such as:

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    a. Issues with a centralised service (e.g. SML, Peppol certificates).

    b. Issues that have the potential to impact a substantial number of participants or wider network operations outside the PA jurisdiction.

    c. Issues that have the reasonable potential to materially impact the reputation of OpenPeppol or the Peppol brand.

    d. Issues that have the reasonable potential to materially expose OpenPeppol to legal risks.

PAs are to immediately proceed to the "Escalate to OpenPeppol" step where the issue warrants immediate escalation.

4.4 Peppol Authority Investigation

The PA will:

1. Investigate the issue and resolution/mitigation solution/s. This could include:

    a. Meeting with the SP to understand details or clarify any matters.

    b. Consultation with SPs, participants, PAs, and/or OpenPeppol and its communities/forums.

    c. Consideration of any issues/risks, including to interoperability, network integrity, security, Peppol reputation, or legal liability.

    d. Reviewing extracts of system specifications, data, code, or other artefacts.

    e. Collecting other evidence that may be necessary for understanding the issue.

All OpenPeppol Members and OpenPeppol must:

1. Co-operate in good faith and at their own reasonable expense, support any investigation, including the provision of any information, documents, or data relevant to the investigations.

4.5 Peppol Authority Resolution

The PA will:

1. Work with participants, PAs, and/or OpenPeppol and its communities/forums to resolve the issue as required. This can include:

    a. Requiring immediate action or interim measures to reduce the impact of the issue.

    b. Developing a plan to resolve the issue by a target date.

    c. Co-ordinating actions of participants, PAs, OpenPeppol to resolve the issue.

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    d. Monitoring the issue until it is resolved. This could include:

        i. Requiring updates.

        ii. Providing status updates (especially for major issues) to OpenPeppol, PAs, SPs.

    e. Verification that the issue has been resolved.

All OpenPeppol Members and OpenPeppol will:

1. Co-operate in good faith and at their own reasonable expense, support any resolution actions.

When the issue is resolved, the PA will:

1. Close the issue on the register.

2. Undertake any communication on the resolution to other Peppol participants, with consideration to those who were impacted or involved in issue resolution.

3. Consider reporting to OpenPeppol.

   Some issues must always be reported, even if they are resolved. These include issues of a serious nature or those that have potential to impact Peppol/OpenPeppol's reputation, or legal risks (e.g. security incidents, information breaches/data loss).

   OpenPeppol may choose to take any further action: e.g. improving processes, monitoring, wider communications to OpenPeppol Members.

4. Consider any learnings, improvements, and/or further actions to mitigate the issue from happening again. This could include:

   a. Communications or other recommended actions.

   b. Raising a Request for Change (RFC) for improvements to the Peppol Interoperability Framework (see the Change Management Operational Procedure).

5. Consider if there has been any non-compliance.

   Actual or suspected non-compliance is managed according to the Non-Compliance Operational Procedure.

Where the PA is unable to resolve the issue within the timeframes, the PA will:

1. Escalate the issue to OpenPeppol.

   Where OpenPeppol is acting as the Peppol Authority, there is no further escalation pathway. The issue remains with the OO until it is resolved.

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4.6 Escalate to OpenPeppol

Where the PA is not OpenPeppol, issues can be escalated to OpenPeppol for further support.

SPs may report directly to OpenPeppol in relation to Peppol centralised infrastructure and services where critical resolution may be required.

PAs and SPs can escalate issues to OpenPeppol by:

1. Submitting an issue report through the Peppol Service Desk (see Annex X).

   The PA should include the efforts they have undertaken to resolve the issue.

   The PA will include any original issue report provided by the SP.

The OO will:

1. Register the issue on the issue register.

2. Notify the submitter that the issue has been recorded on the issue register.

4.7 OpenPeppol Assessment

The OO will:

1. Determine the priority of the issue.

   The OO will prioritise the issue as either:

   a. Critical

   b. Urgent

   c. Timely

   d. Convenient

   The OO will take into account the following factors to determine the priority:

   a. The PA's/SP's prioritisation of the issue (the OO has the discretion to change the priority of the issue).

   b. Impact or potential impact to:

      i. Peppol participants.

      ii. Interoperability.

      iii. Network integrity.

      iv. Reputation.

      v. Security.

      vi. Compliance with laws or regulations.

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    c.   Any other factors the OO considers relevant.

4.8 OpenPeppol Investigation

The OO will:

1. Investigate the issue. This could include:

    a. Co-ordinating with PAs on any matters.

    b. Meeting with the SP and/or PA to understand details or clarify any matters.

    c. Consultation with SPs, participants, PAs, and/or OpenPeppol and its communities/forums.

    d. Consideration of any issues/risks, including to interoperability, network integrity, security, Peppol reputation, or legal liability.

    e. Extracts of system specifications, data, code, or other artefacts.

    f. Any other evidence that may be necessary for understanding the issue.

All OpenPeppol Members must:

1. Co-operate in good faith and at their own reasonable expense, support any investigation, including the provision of any information, documents, or data relevant to the investigations.

4.9 OpenPeppol Resolution

The OO will:

1. Work with participants, PAs, and/or OpenPeppol and its communities/forums to resolve the issue as required. This can include:

    a. Requiring immediate action or interim measures to reduce the impact of the issue.

    b. Developing a plan to resolve the issue by a target date.

    c. Co-ordinating actions of participants, PAs, OpenPeppol to resolve the issue.

    d. Monitoring the issue until it is resolved. This could include:

        i. Requiring updates.

        ii. Provide status updates (especially for major issues) to the MC and relevant communities.

        Open issues will normally be tabled to the MC as part of the OO's operational reporting. The following issues will be highlighted for MC attention:

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1. Urgent issues.

2. Severe issues - taking into account impact, or potential impact, to interoperability, network integrity, reputation, security, and compliance with laws or regulations.

3. Issues not resolved within the set timeframes (for each priority category).

e. Verification that the issue has been resolved.

All OpenPeppol Members must:

1. Co-operate in good faith and at their own reasonable expense, support any resolution actions.

Where the issue is resolved, the OO will:

1. Close the issue on the register.

2. Undertake any communication on the resolution to other Peppol participants, with consideration to those who were impacted or involved in issue resolution.

3. Consider any learnings, improvements, and/or further actions to mitigate the issue from happening again. This could include:

a. Communications or other recommended actions.

b. Raising a Request for Change (RFC) for improvements to the Peppol Interoperability Framework (see the Change Management Operational Procedure).

c. Consider if there has been any non-compliance.

Actual or suspected non-compliance is managed according to the Non-Compliance Operational Procedure.
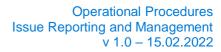
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Attachment A: Issue Report

Issue Report	
Issue details	
Title	*Provide a name for the issue*
Description	*Briefly describe the issue*
Date/Time	*When did it happen, or when did you become aware of the issue?*
Cause	*What do you understand caused or is causing it to happen?*
Consequence	*How is the issue impacting? Who and what are impacted?*
Is it resolved?	*Yes / No*
Issue type *(Select all that apply)*	☐ Infrastructure issue ☐ Interoperability ☐ Security incident ☐ Framework issue ☐ Potential non-compliance ☐ Other ☐ Information breach/data loss
Priority *(Select one only)*	☐ Critical ☐ Urgent ☐ Timely ☐ Convenient
Severity *(Select one only)*	☐ Extreme — Would stop Interoperability broadly across the Peppol Network, AND/OR Severe corruption of the validity of Peppol document(s) (incl. security breach)

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	☐ Very high	Widespread impact to Interoperability, AND/OR
		Significant threat to Interoperability across the Peppol Network, AND/OR
		Significant corruption of the validity of Peppol document(s) (incl. security breach)
	☐ High	Impact to Interoperability in multiple domains or multiple PA jurisdictions, AND/OR
		Moderate threat to Interoperability across the Peppol Network, AND/OR
		Limited corruption of the validity of Peppol document(s) (incl. security breach)
	☐ Medium	Would threaten an element of the Peppol Interoperability Framework
	☐ Low	Would have minimal consequence to the Peppol Interoperability Framework
Potential/current mitigations	*Detail any mitigations that could or are mitigating the issue or incident.*	

Submitter details	
Organisation	*Peppol Authority or Service Provider lodging the issue (details as per registration with Peppol Co-ordinating Authority)*
Contact	*Primary contact for the issue reporter*
Phone	*Primary contact's phone number*
E-Mail	*Primary contact's email address*

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