



Peppol

The future is open

Operational Procedures

Non-compliance 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
Working/business days	Defined in the location of the Peppol Coordinating Authority – Brussels, Belgium.
CT	Compliance Team
MC	OpenPeppol Managing Committee
OO	OpenPeppol Operating Office
PA	Peppol Authority
PA/CT	Peppol Authority Compliance Team
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.

1 Purpose

This document sets out the processes and procedures for management of actual or potential non-compliance by participants in the Peppol Interoperability Framework.

This includes non-compliance by:

- **Peppol Service Providers (SPs)**
- other **Peppol participants** (e.g. other End User software/service providers)

2 Introduction

Compliance with the Peppol Interoperability Framework, including the agreements, internal regulations, policies, or architectural documents and specifications, ensures continued interoperability and stable operation of the network.

Proactive supervision and monitoring for non-compliance safeguards all participants and reduces risks to the reputation of Peppol. Transparent and structured non-compliance management processes and procedures promotes fair and equitable treatment across the Peppol community. OpenPeppol seeks to undertake proactive supervision and monitoring to reduce risk. Peppol Authorities may also undertake proactive monitoring.

The policy on Compliance is stated in Internal Regulations for Use of the Peppol Network (chapter 9).

3 Process Overview

This process is designed to minimise unnecessary formal intervention by the Peppol Coordinating Authority in the resolution of non-compliance, with an escalating series of actions available where non-compliance is not rectified.

If there is found to be no instance of non-compliance, or the non-compliance is rectified, the compliance action will cease.

It may be appropriate in some situations to immediately suspend access – e.g. to mitigate against wider impacts to the network, or where the non-compliance is severe, or repetitive.

Note: updates and outcomes of any action (including investigation, decision, or resolution) will not be provided directly to the party that reported the suspected non-compliance. General reporting and learnings by OpenPeppol or PAs may be undertaken, within the constraints of the Peppol Agreement, and relevant privacy and secrecy laws.

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 Suspected non-compliance should initially be raised directly with the party suspected of being non-compliant, providing early awareness, and an opportunity to rectify.	Peppol Participants / OpenPeppol
2	Report non-compliance If unresolved, actual or suspected non-compliance can be reported to the PA or OO for action (generally the party whom the party has signed with).	Peppol Participants / OpenPeppol
3	Investigate An investigation will be conducted to determine if non-compliance has occurred and to assess the severity of any non-compliance and the resolution required.	OpenPeppol Compliance Team / Peppol Authority
4	Consider Immediate Suspension It may be appropriate in some situations to immediately suspend access to the Peppol Network without issuing a warning note.	OpenPeppol Compliance Team / Peppol Authority
5	Informal Resolution Parties will normally be provided with the opportunity to resolve any issues without the need to embark on formal processes.	OpenPeppol Compliance Team / Peppol Authority
6	Warning note The party will be issued with a formal warning note of the finding of non-compliance and provided with an instruction to take corrective action to rectify the non-compliance.	OpenPeppol Compliance Team / Peppol Authority
7	Private non-complying list A non-complying party can be listed on a private (OpenPeppol Member) website as non-complying.	OpenPeppol Compliance Team / Peppol Authority
8	Public non-complying list A non-complying party can be listed on a public website as non-complying.	OpenPeppol Compliance Team / Peppol Authority
9	Suspend access A non-complying party can be temporarily suspended from accessing the Peppol Network (i.e. by revocation of any certificates) for a set period of time.	OpenPeppol Compliance Team / Peppol Authority

10	Removal	A non-complying party can have access to the Peppol Network removed (i.e. by revocation of any certificates) and this can be taken into account when granting any future access to the Peppol Network.	OpenPeppol Compliance Team / Peppol Authority
11	Dispute resolution	A review of key decisions will be conducted, if requested by the party.	OpenPeppol Operating Office

4 Procedures

4.1 Raise with Party

Suspected instances of non-compliance can be identified by any affected party (including PAs, SPs, other software or service providers, End Users) or OpenPeppol.

Where the actual or suspected non-compliance relates to an SP's own obligations, the SP must report the matter, as set out in the next step.

Where the suspected non-compliance relates to another party, the suspected non-compliance should first be raised directly with the party who is suspected of non-compliance. Where the suspected non-complying party is contracted to a SP (referred as a contracted party), the SP should be contacted, if they can be identified.

This recognises that many instances of non-compliance may be unintentional or inadvertent (e.g. as an unforeseen and unintended outcome of a system update) and may not even be known by the non-complying party. Providing early awareness to the party provides an opportunity to rectify and resolve the issue without further unnecessary intervention.

4.2 Report suspected non-compliance

If the actual or suspected non-compliance relates to another party and it is not resolved through direct engagement or the party cannot be identified or contacted, it should be reported for action.

Actual/suspected non-compliance by an SP, is to be reported:

1. Directly to the PA with whom the reporting SP has signed its SP Agreement or to the PA with whom the reported SP has signed the SP Agreement, through any contact mechanism advertised by the PAs.

The PA may request completion of the template in **Attachment A**.

OpenPeppol maintains contact details for PAs, available on the OpenPeppol website.

The PA who receives the report may liaise or work with the OO and/or multiple PAs if more than one PA is impacted, or if the issue relates to Peppol central infrastructure.

The PA will provide a receipt notifying that the issue has been lodged and seek to keep the SP informed of the progress, with consideration to confidentiality requirements.

2. Where OpenPeppol is acting as the PA for the SP, by submitting an Issue Report through the Peppol Service Desk.

The template in **Attachment A** must be completed and attached to the Issue Report.

The OO will provide a receipt notifying that the issue has been lodged and seek to keep the SP informed of the progress, with consideration to confidentiality requirements.

Actual/suspected non-compliance by a contracted party, is to be reported:

1. Where the SP for the contracted party is known, by using the same channels as if the reporting was for a SP.
2. Where the SP for the contracted party is not known, by submitting an Issue Report through the Peppol Service Desk.

The template in **Attachment A** must be completed and attached to the Issue Report.

Where matters are reported to OpenPeppol or identified by OpenPeppol, the OO will:

1. Where the actual/suspected non-compliance relates to a SP or one of their contracted parties, allocate the matter to the relevant PA.
2. Where OpenPeppol is acting as the PA for the SP, the OO will allocate the matter to the CT.

4.3 Investigate

The CT or relevant PA will investigate to:

1. Determine whether non-compliance has occurred.
2. Determine the extent of the non-compliance.
3. Determine the urgency of resolution, including consideration of:
 - a. Impact to the integrity of the Peppol Network
 - b. Ongoing impact of the non-compliance on Peppol participants
 - c. Threats to the security of the Peppol Network

- d. Impact on the reputation of the Peppol Network and/or confidence in its good governance
4. Estimate a reasonable timeframe to rectify the non-compliance, taking into account the urgency and complexity/difficulty to rectify.

This investigation may include:

1. Requiring the potentially non-complying SP to provide information or support to conduct the investigation.
2. Requiring any other OpenPeppol Member (including SPs/PAs) to provide information or support to conduct the investigation.
3. Requiring OpenPeppol to provide information or support to conduct the investigation.
4. Reviewing any documents or information relating to this or similar incidents.

All OpenPeppol Members will:

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.

If the investigating PA/CT finds that no instance of non-compliance has occurred:

1. The PA/CT will inform the SP of the finding that there is no instance of non-compliance.
2. The PA/CT may recommend action to mitigate any further misunderstanding or issue in the future.

4.4 Consider Immediate Suspension

Normally non-compliance will be managed following an escalating pathway until the issues are resolved or the non-complying party's agreement is terminated. This escalation is generally as follows:

- Attempt informal resolution
- Issue a warning note
- Publish on a private (OpenPeppol Member) non-complying list
- Publish on a public non-complying list
- Temporarily suspend access to the Peppol Network (revoke certificate for set period)
- Remove access to the Peppol Network (revoke any certificates)

However, it may be appropriate in some situations to immediately suspend access to the Peppol Network without issuing a warning note, or any preceding compliance action, where the PA considers the non-compliance sufficiently serious. This would normally only be undertaken where:

1. The non-compliance threatens the integrity or security of the network, or
2. There is a significant impact to the operations of the network

The PA/CT in considering immediate suspension will take into account:

1. The urgency/time criticality of remediation/rectification,
2. The seriousness of the non-compliance, including impacts to other Peppol participants,
3. Whether the non-compliance was deliberate, done with disregard, and
4. Any history of past non-compliance.

If immediate suspension is considered necessary and appropriate the PA/CT will:

1. Confer with the OO to determine whether to proceed with immediate suspension.
The OO's advice will be taken into account, but agreement of the OO is not required.
2. If immediate suspension is needed, the PA/CT may proceed with the Suspend Access process (see below) after providing five (5) days' notice to the SP.
3. Following the suspension, the PA/CT will proceed with the other non-compliance treatment actions.

As part of the suspension process (see section below), the PA/CT is able to extend any suspension as needed (e.g. to allow a plan developed by the SP within the 5 day's notice to be put into place, or for the non-compliance to be resolved).

4.5 Informal resolution

Parties will normally be provided with the opportunity to resolve any issues without the need to embark on formal processes.

This would normally involve:

1. Agreeing to a plan of actions and timeframes to rectify the non-compliance, which could include:
 - a. Any interim actions and timeframes to mitigate the impact to other Peppol participants while the non-compliance is being fully rectified.
 - b. Any progress reporting or monitoring requirements.

- c. What is required to verify the rectification has been completed and the party is no longer non-complying.
2. Executing the plan.
3. Verifying the non-compliance has been rectified.

If the SP rectifies the issue:

1. The PA/CT will inform the SP that the matter has been resolved.

The PA/CT can recommend action to mitigate any future issues.

The PA/CT may proceed at any time to the next step if it is not satisfied with the actions or progress.

4.6 Warning note

The investigating PA/CT will issue a warning note to the non-complying SP:

1. Stating the finding of non-compliance, including:
 - a. Clearly identify the nature of the non-compliance.
 - b. Reasoning for the finding of non-compliance.
2. Instructing they must rectify the non-compliance, including:
 - a. Actions and timeframes to rectify the non-compliance.
 - b. Any interim actions and timeframes.

This could include immediate action and interim steps to mitigate the impact to other Peppol participants while the non-compliance is being fully rectified.
 - c. Provision of a plan within five (5) working days meeting these requirements.

Urgent matters may require faster resolution timeframes.
 - d. What is required to verify the rectification has been completed.
3. Specifying any further action to be undertaken by the PA/CT to mitigate any future issues or further misunderstanding. This could include:
 - d. Updating procedures and processes.
 - e. Communications with other OpenPeppol Members and/or participants.
4. Stating the penalties and next steps that will be enforced if the non-compliance is not corrected. At a minimum this should state:
 - a. Private (OpenPeppol Member) non-complying list – the SP will be published as non-complying in an OpenPeppol Members only area of the OpenPeppol website unless the non-compliance is rectified by a defined date.

- b. Public non-complying list – if the non-compliance continues to be unrectified, the SP will be published as non-complying on the public OpenPeppol website.
 - c. Suspend access – if the non-compliance continues to be unrectified, the SP's access to the Peppol Network will be suspended.
 - d. Remove access – if the non-compliance continues to be unrectified, the SP's access to the Peppol Network will be removed.
5. Provide a contact to discuss/clarify any details in the notification.
 6. Informing of the option to seek a review of the finding of non-compliance.

Investigating PAs will:

1. Provide a copy of any warning notes issued to SPs, to the CT, within 2 business days of issuing the warning note.

The OO will:

1. Register the issuing of the non-compliance warning note on the Non-compliance Register.

The SP can:

1. Rectify the non-compliance.
2. Seek an extension of time.
Extensions may be granted (in full or in part) or denied at the full discretion of the PA/CT.
3. Seek a review (see section below).

If the SP rectifies the non-compliance:

1. The PA/CT will inform the SP that the matter has been resolved.
The PA/CT can recommend action to mitigate any future issues.
2. Co-ordinate with the CT to update the Non-compliance Register to reflect the non-compliance has been rectified.

If the SP fails to rectify the non-compliance, or is not satisfied with the actions or progress, the PA/CT may proceed to the next step.

4.7 Private (OpenPeppol Member) non-complying list

The PA/CT can publish the fact that the SP is “non-complying” on a closed OpenPeppol Member area of OpenPeppol website.

The investigating PA/CT will:

1. Issue a new warning note:
 - a. Stating the SP will be published as non-complying on the OpenPeppol Members area of the OpenPeppol website unless the non-compliance is rectified by a set date.

The warning note may reference previous warning note(s) for details.
 - b. Informing of the option to seek a review.

The SP can:

1. Rectify the non-compliance.
2. Seek an extension of time.

Extensions may be granted (in full or in part) or denied at the full discretion of the PA/CT.
3. Seek a review (see section below)

If the non-compliance is not rectified by the set date, the PA/CT will:

1. Advise the OpenPeppol Operating Office (OO) that the SP is to be published as non-complying on the OpenPeppol Members area of the OpenPeppol website.
2. Notify the SP that they are being published as non-complying on the OpenPeppol Members area of the OpenPeppol website.
3. Co-ordinate with the CT to update the Non-Compliance Register to reflect the action to publish the SP's details on the OpenPeppol Members area of the OpenPeppol website.

The OO will:

1. Add the non-complying SP details to the OpenPeppol Members area of the OpenPeppol website.
2. Inform the PA/CT on completion of the action.

If the SP rectifies the non-compliance:

1. The PA/CT will co-ordinate with the OO to remove the listing on the OpenPeppol Members area of the OpenPeppol website.
2. The PA/CT will inform the SP that the matter has been resolved and their non-complying status has been removed on the OpenPeppol Members area of the OpenPeppol website.

The PA/CT can recommend action to mitigate any future issues.

3. PAs will co-ordinate with the CT to update the Non-compliance Register to reflect the non-compliance has been rectified.

The non-compliance may be taken into account in the assessment of any future non-compliance.

If the SP fails to rectify the non-compliance, or is not satisfied with the actions or progress, the PA/CT may proceed to the next step.

4.8 Public non-complying list

The PA/CT can publish the fact that the SP is “non-complying” on a public website of OpenPeppol and on a website of the relevant PA.

The investigating PA/CT will:

1. Issue a new warning note:
 - a. Stating the SP will be published as non-complying on the public OpenPeppol website unless the non-compliance is rectified by a defined date.
The warning note may reference previous warning note(s) for details.
 - b. Informing of the option to seek a review.

The SP can:

1. Rectify the non-compliance.
2. Seek an extension of time.

Extensions may be granted (in full or in part) or denied at the full discretion of the PA/CT.

3. Seek a review (see section below)

If the non-compliance is not rectified by the set date, the PA/CT will:

1. Advise the OO that the SP is to be published as non-complying on a public OpenPeppol website.
2. Notify the SP that they have failed to meet the timeframe defined in the warning note advising that their details are being published on the public OpenPeppol website and on the PA website (if applicable).
3. Co-ordinate with the CT to update the Non-Compliance Register to reflect the action to publish the SP’s details on the public OpenPeppol website.

The OO will:

1. Update the public OpenPeppol website with the details of the non-complying SP.
2. Inform the PA/CT on completion of the action.

The PA for the SP will:

1. Publish details of the non-complying SP on their website.

2. Once published, other PAs may replicate or disseminate this information on their website, publications, or other communications.

If the SP rectifies the non-compliance:

1. The PA/CT will co-ordinate with the OO to remove the listing on the public OpenPeppol website.
2. The PA will remove the listing on its website (if applicable.)
3. The PA will co-ordinate other PAs to update any information on other PA websites (if applicable).
4. The PA/CT will inform the SP that the matter has been resolved and their details have been removed from the public OpenPeppol website and have been/are being removed from PA websites.

The PA/CT can recommend action to mitigate any future issues.

5. PAs will co-ordinate with the CT to update the Non-compliance Register to reflect the non-compliance has been rectified.

The non-compliance may be taken into account in the assessment of any future non-compliance.

If the SP fails to rectify the non-compliance, or is not satisfied with the actions or progress, the PA/CT may proceed to the next step.

4.9 Suspend access

The PA/CT may temporarily remove the SP's to access the Peppol Network for a defined period of time.

The investigating PA/CT will:

1. Issue a warning note:
 - a. Stating the Peppol certificate(s) of the SP will be revoked for a period of time, removing access to the Peppol network unless the non-compliance is rectified by a defined date.

The warning note will set out the effective dates of the suspension.

The warning note may reference previous warning note(s) for details.

- b. Informing of the option to seek a review.

The SP can:

1. Rectify the non-compliance.
2. Seek an extension of time.

Extensions may be granted (in full or in part) or denied at the sole discretion of the PA/CT.

3. Seek a review (see section below)

If the non-compliance is not rectified by the set date, the PA/CT will:

1. Instruct the OO to suspend the certificate of the SP.
The effective dates for the suspension, set out in the warning note, will be provided with this instruction.
2. Notify the SP that they have failed to meet the timeframe defined in the warning note and their certificate(s) are suspended for the period advised in the warning note.
3. Co-ordinate with OO to publish details of the suspension on the OpenPeppol website.
4. Co-ordinate with the OO to notify all OpenPeppol Members that the certificate(s) of the SP is suspended (including the effective dates of the suspension).
5. Co-ordinate with the CT to update the Non-Compliance Register to reflect the suspension of the certificate(s) of the SP.

The OO will:

1. Revoke any certificate(s) of the SP as instructed.
2. Inform the PA/CT on completion of the action.
3. Publish details of the suspension on the OpenPeppol website.
4. Assist the PA to notify all OpenPeppol Members of the suspension.

If the SP rectifies the non-compliance:

1. The PA/CT will instruct the OO to issue any new certificates required by the SP.
2. OO will update the listing on its website.
3. The PA/CT will inform the SP that the matter has been resolved and that the suspension has been removed.
4. The PA/CT can recommend action to mitigate any future issues.
5. PAs will co-ordinate with the CT to update the Non-compliance Register to reflect the non-compliance has been rectified.

The non-compliance may be taken into account in the assessment of any future non-compliance.

If the SP fails to rectify the non-compliance, or is not satisfied with the actions or progress, the PA/CT may:

1. Extend the suspension following the same steps for the initial suspension with the updated effective dates, or
2. Proceed to the next step.
3. In instances of immediate suspension (see above), the next step will be an Informal Resolution (see above).

4.10 Removal

Ultimately, ongoing non-compliance will result in the PA/CT needing to remove access of the SP to the Peppol Network for the protection of all its members.

The investigating PA/CT will:

1. Issue a warning note:
 - a. Stating the SP's access to the Peppol Network will be removed unless the non-compliance is rectified by a defined date.
The warning note may reference previous warning note(s) for details.
 - b. Informing of the option to seek a review.

The SP can:

1. Rectify the non-compliance.
2. Seek an extension of time.
Extensions may be granted (in full or in part) or denied at the sole discretion of the PA/CT.
3. Seek a review (see section below)

If the non-compliance is not rectified by the set date, the PA/CT will:

1. Instruct the OO to remove the SP's access to the Peppol network (including the effective date).
2. Notify the SP that they have failed to meet the timeframe defined in the warning note and their access has been removed (including the effective date).
3. Co-ordinate with OO to publish details of the removal on the OpenPeppol website (including the effective date).
4. Co-ordinate with the OO to notify all OpenPeppol Members of the SP's removal from the Peppol network (including the effective date).
5. Inform the SP of the option to seek a review of the decision to remove their access to the Peppol Network.

6. Co-ordinate with the CT to update the Non-Compliance Register to reflect the removal of the SP's access.

The OO will:

1. Remove the SP's access to the Peppol Network as instructed i.e. by revoking any certificates.
2. Inform the PA/CT on completion of the action.
3. Publish details of the removal on the OpenPeppol website.
4. Assist the PA to notify all OpenPeppol Members of the removal.

The SP may re-apply for access to the Peppol Network at any time. The non-compliance may be taken into account in the assessment of whether to grant access.

4.11 Dispute resolution

When under investigation for actual or potential non-compliance, the SP may:

1. Dispute any decision(s) by raising a request to review the decision to the MC.
These decisions include:
 - a. Finding of non-compliance.
 - b. Requirements and timeframes to rectify non-compliance.
 - c. Decision to publish as non-complying on an OpenPeppol Member area of the OpenPeppol website.
 - d. Decision to publish as non-complying on the public OpenPeppol website.
 - e. Decision to suspend SP's/PA's certificate/s, or
 - f. Decision to remove the SP from the Peppol Network.

Multiple reviews cannot be sought on the same decision.
2. Each of six (6) decisions listed above are considered to be separate decisions and therefore are individually reviewable decisions.
3. However, each decision can only be the subject of one review. Subsequent reviews cannot be used to relitigate a decision which has already been subject to review.
4. As it is possible to seek separate reviews for each of the decisions, the MC can take into account previous reviews related to the same compliance matter and may deal with repeated frivolous or vexatious applications for reviews summarily.

The SP:

1. Should first attempt to resolve with the PA/CT.

2. Inform the PA/CT in writing that they are seeking a review within 5 business days of a warning note for the relevant reviewable decisions.
3. Inform the OO in writing they have requested a review.
4. Provide a submission within 15 business days of notification of the relevant reviewable decision, stating:
 - a. Detailed reasons why the MC should substitute a different decision.
 - b. Recommendation / options on the alternative decision / actions which should be taken.
 - c. Any additional or new information or change in circumstances which should be considered by the MC.

The PA/CT will:

1. Provide information to the MC, within 15 business days of an application for review:
 - a. The reasons for the decision, which is the subject of the review, and
 - b. Documents and evidence gathered during the CT's/PA's investigations.

The OO will:

1. Ensure that appropriate documentation has been provided from the SP and the PA/CT.
2. Table the non-compliance issue at the next MC meeting.

The MC will:

1. Consider the situation and decision(s) on its merits.

The MC is able to consider all previous information and new information which may not have been available/provided at the time of the decision. The MC will assess the case and make a final decision.
2. Invite the PA/CT to present their decision and the reasons for it.
3. Invite the SP to present its submission.
4. Seek further any information or views from any party as it sees fit.
5. Take into account previous reviews on the same compliance matter as appropriate.
6. Instruct the PA/CT on how to proceed with the non-compliance issue.

The instruction or recommendation could be to:

 - a. Affirm the original decision.

- b. Vary/amend the original decision - this will include how the decision should varied), or
- c. Set aside (reverse) the original decision.

The MC will include reasons for its decision.

The recommendation could include other actions to mitigate future issues or misunderstandings.

The PA/CT will:

1. Take the instruction from the MC on how to proceed with the non-compliance issue.
2. Inform, or instruct the OO to inform, the SP of the decision on their application for review.
3. Inform, or instruct the OO to inform, the SP that the MC decision on this matter is not subject to further review.
4. Take appropriate action to give effect to the MC decision (if any).

If the decision is to set aside (reverse) the original decision, the PA/CT will:

- a. Undertake action, as far as reasonably practicable, to remove or reverse all publications and registers as if the original decision had not been made.
- b. Where the original decision had been communicated to OpenPeppol Members, inform all members that the finding/decision had been reversed.

This review process does not affect the ability of the SP from seeking a court decision.

Attachment A: Issue Report

Issue Report		
Issue details		
Title	<i>Provide a name for the issue</i>	
Description	<i>Briefly describe the issue</i>	
Date/Time	<i>When did it happen, or when did you become aware of the issue?</i>	
Cause	<i>What do you understand caused or is causing it to happen?</i>	
Consequence	<i>How is the issue impacting? Who and what are impacted? If the issue relates to a specific party, include their name, contact details and role.</i>	
Is it resolved?	Yes / No	
Issue type <i>(Select all that apply)</i>	<input type="checkbox"/> Interoperability <input type="checkbox"/> Potential non-compliance <input type="checkbox"/> Security incident/breach <input type="checkbox"/> Information breach/data loss	<input type="checkbox"/> Peppol Infrastructure <input type="checkbox"/> Peppol Framework <input type="checkbox"/> Other
Priority <i>(Select one only)</i>	<input type="checkbox"/> Critical <input type="checkbox"/> Urgent <input type="checkbox"/> Prompt <input type="checkbox"/> Timely <input type="checkbox"/> Convenient	Decision or resolution is needed as fast as possible (within 1 day) Decision or resolution is needed within 5 working days. Decision or resolution is needed within two weeks. Decision or resolution is required within one month. Decision or resolution required more than one month in the future.

Severity <i>(Select best estimate)</i>	<input type="checkbox"/> Extreme	Would stop Interoperability broadly across the Peppol Network, AND/OR Severe corruption of the validity of invoices (incl. security breach)
	<input type="checkbox"/> 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 documents (incl. security breach)
	<input type="checkbox"/> 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 documents (incl. security breach)
	<input type="checkbox"/> Medium	Would threaten an element of the Peppol Interoperability Framework
	<input type="checkbox"/> Low	Would have minimal consequence to Interoperability

Potential/current mitigations	<i>Detail any mitigations that could or are mitigating the issue or incident.</i>
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Submitter details

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