

**Amendment No.1 to the  
Draft Single Programming Document of  
the Agency for Support for BEREC  
('BEREC Office')  
for the period 2026-2028**

24 April 2025

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## Foreword

We are pleased to present the Single Programming Document for the Agency for Support for BEREC for the years 2026-2028. This document outlines the basis for both our recurring operations and the specific activities carried out in support of the Body of European Regulators for Electronic Communications (BEREC).

BEREC was established in 2009 to facilitate collaboration among National Regulatory Authorities (NRAs) and with the European Commission, while serving as an independent and transparent forum for expertise in electronic communications. Also established in 2009 and headquartered in Riga, Latvia, the BEREC Office was created to deliver professional and administrative support to BEREC. In 2018, the European Electronic Communications Code (EECC) assigned additional tasks to BEREC, and the BEREC Regulation (EU) 2018/1971 strengthened its role in developing the internal market. This regulation established the Office as the decentralized EU agency, providing essential support to BEREC's activities. The governance and operation rules of the BEREC Office align with the principles outlined in the Joint Statement of the European Parliament, the Council, and the European Commission of 19 July 2012 on decentralized agencies.

The rapid evolution of the digital domain is transforming communication, collaboration, and business operations, and brings along both challenges and opportunities. Technological change in electronic communications is further happening at a fast pace. In the coming years, the sector will experience an increased integration of terrestrial and non-terrestrial communication technologies. The use of cloud computing and Artificial Intelligence (AI) in networks is likely to expand further, and research on the use of quantum computing in telecommunication is growing. At the same time, enhancing the physical and digital security of communication networks and rendering our networks - the backbone of our digital economies and societies - more resilient, is paramount.

In this context, BEREC's mission plays an essential role in fostering a regulatory framework that ensures consistency and efficiency while promoting competition, investment, and innovation within the internal market. BEREC further actively contributes to the implementation of the Digital Markets Act (DMA) being a member of the DMA High-Level Group and is active in the area of the Digital Services Act (DSA). At the end of 2024, BEREC established a Working Group on Cybersecurity and Resilience to give these topic areas more weight in its work programme. This increasingly holistic approach in the digital ecosystem aims to deliver meaningful benefits to European citizens and businesses. The BEREC Office fully supports BEREC to address the complexities of this rapidly changing sector and the underlying regulatory framework.

This Single Programming Document reflects our dedication to adapting and innovating in response to the dynamic developments within electronic communications. This programming period further creates a unique opportunity to future-proof Europe's digital regulatory framework with the review of the EECC by the Commission in 2025. BEREC and the BEREC Office are ready to take an active role in shaping Europe's future regulation with their expertise, data, and

overall evidence-based approach firmly rooted in the pro-competitive regulatory approach laid down in the EECC.

Should the review of the EECC and the European Commission's evaluation of BEREC and the BEREC Office lead to changes in the overall digital European regulatory and institutional frameworks, we stand ready to take on additional responsibilities aligned with market and technological developments.

At the same time, enhancing the cybersecurity framework and ensuring compliance with the new Cybersecurity Regulation is a priority for the BEREC Office. To address these demands effectively, the Agency calls for a reassessment of its human and financial resources in this area.

We take pride in our recognized achievements, endorsed by the European Court of Auditors and the European Parliament as the Discharge Authority. This acknowledgment confirms that EU budget resources are utilized fully in line with legislative expectations.

We believe that the clear strategic direction laid down in this document together with precise programme planning ensures our contribution to the achievement of Europe's digital and connectivity targets in order for everyone to be able to participate fully in the digital economy.

**Annegret Groebel**

BEREC Office Advisory Group Chair

**Verena Weber**

Director

## List of acronyms

| Acronym                    | Meaning  |
|----------------------------|--|
| ABAC                       | Accrual Based Accounting   |
| ABB                        | Activity-based budgeting   |
| ABC                        | Activity-based costing   |
| ABM                        | Activity-based budget management   |
| AD                         | Administrator  |
| AGM                        | Advanced Gateway to your Meetings application  |
| AI                         | Artificial Intelligence  |
| AST                        | Assistant  |
| AST/SC                     | Secretaries and clerks   |
| AWP                        | Annual work programme  |
| BaaS                       | Backup as a service  |
| BAG                        | BEREC Office Advisory Group  |
| BEREC                      | Body of European Regulators for Electronic Communications  |
| BEREC Office (or 'Agency') | Agency for Support for BEREC   |
| BEREC Regulation           | <a href="#">Regulation (EU) 2018/1971 of the European Parliament (EP) and of the Council of 11 December 2018 establishing the Body of European Regulators for Electronic Communications (BEREC) and the Agency for Support for BEREC (BEREC Office), amending Regulation (EU) 2015/2120 and repealing Regulation (EC) No 1211/2009<sup>1</sup></a> |
| BoR                        | BEREC Board of Regulators  |
| CA                         | Contract Agent   |
| CAAR                       | Consolidated annual activity report  |
| CEOS                       | Conditions of Employment of Other Servants   |

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<sup>1</sup> OJ L 321, 17.12.2018, p. 1–35 (BG, ES, CS, DA, DE, ET, EL, EN, FR, GA, HR, IT, LV, LT, HU, MT, NL, PL, PT, RO, SK, SL, FI, SV) ; <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1546511040230&uri=CELEX:32018R1971>

| Acronym | Meaning  |
|---------|--|
| CERT    | Computer emergency response team   |
| CIAR    | Consolidated interim activity report   |
| CN      | Contact Network  |
| DMA     | Digital Markets Act  |
| DPO     | Data Protection Officer  |
| DSA     | Digital Services Act   |
| EC      | European Commission  |
| EDPS    | European Data Protection Supervisor  |
| EEA     | European Economic Area   |
| EECC    | <a href="#">European Electronic Communications Code (Directive (EU) 2018/1972 of the EP and of the Council of 11 December 2018 establishing the European Electronic Communications Code</a> <sup>2</sup> |
| EFTA    | European Free Trade Association  |
| ENG     | Expert Networking Group  |
| ENISA   | European Network and Information Security Agency   |
| EP      | European Parliament  |
| EU      | European Union   |
| EUAN    | European Union Agencies' Network   |
| FG      | Functional group   |
| FTE     | Full-time equivalent post  |
| FWC     | Framework contract   |
| GHG     | Green House Gas  |

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<sup>2</sup> OJ L 321, 17.12.2018, p. 36–214 (BG, ES, CS, DA, DE, ET, EL, EN, FR, GA, HR, IT, LV, LT, HU, MT, NL, PL, PT, RO, SK, SL, FI, SV); <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1546582829499&uri=CELEX:32018L1972>

| Acronym    | Meaning  |
|------------|--|
| HAN        | HERMES <sup>3</sup> -ARES <sup>4</sup> -NomCom <sup>5</sup>  |
| HR         | Human resources  |
| IaaS       | Infrastructure as a service  |
| ICT        | Information and communication technologies   |
| IT         | Information technologies   |
| KPI        | Key performance indicator  |
| LCO        | Local Cybersecurity Officer  |
| MB         | BEREC Office Management Board  |
| MoU        | Memorandum of Understanding  |
| MS         | Member State   |
| NRA        | National Regulatory Authority  |
| the Office | <a href="#">The Office of the Body of European Regulators for Electronic Communications as established by Regulation (EC) No 1211/2009 of the EP and of the Council of 25 November 2009</a> <sup>6</sup> |
| OLAF       | European Anti-Fraud Office   |
| PaaS       | Platform as a service  |
| RBFM       | Report on budgetary and financial management   |
| RoP        | Rules of Procedure   |
| RPO        | Recovery point objective   |
| RTO        | Recovery time objective  |
| SaaS       | Software as a service  |
| SLA        | Service Level Agreement  |

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<sup>3</sup> The Commission unique repository for all official documents

<sup>4</sup> Advanced Records System

<sup>5</sup> Nomenclature Commune

<sup>6</sup> OJ L 337, 18.12.2009, p. 1–10 (BG, ES, CS, DA, DE, ET, EL, EN, FR, GA, IT, LV, LT, HU, MT, NL, PL, PT, RO, SK, SL, FI, SV); a special edition (HR); <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1546582997398&uri=CELEX:32009R1211>; No longer in force, Date of end of validity: 19/12/2018; Repealed by 32018R1971



| Acronym        | Meaning   |
|----------------|---|
| SNE            | Seconded National Expert  |
| Sysper2        | Système de gestion du Personnel <sup>7</sup> , version 2  |
| TA             | Temporary Agent   |
| TSM Regulation | <a href="#"><u>Telecoms Single Market Regulation (Regulation (EU) 2015/2120 of the EP and of the Council of 25 November 2015 laying down measures concerning open internet access and amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services and Regulation (EU) No 531/2012 on roaming on public mobile communications networks within the Union)</u></a> <sup>8</sup> |
| WG             | Working Group   |
| WP             | Work Programme  |

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<sup>7</sup> System for management of personnel

<sup>8</sup> OJ L 310, 26.11.2015, pp. 1–18 <https://eur-lex.europa.eu/eli/reg/2015/2120/oj>



## Mission Statement



The Agency for Support for BEREC (BEREC Office) was established by [Regulation \(EU\) No 2018/1971 of the European Parliament and of the Council of 11 December 2018](#), replacing the previous Regulation (EC) No 1211/2009. The BEREC Office is a body of the European Union (EU) with legal personality created to provide professional and administrative support services to the Body of European Regulators for Electronic Communications (BEREC), a body of the EU without a legal personality.

BEREC contributes to the development and better functioning of the internal market for electronic communications networks and services as well as to other European digital instruments such as the Digital Markets Act (DMA) and the Digital Services Act (DSA). It does so, by aiming to ensure a consistent application of the EU regulatory framework and by aiming to promote an effective internal market, in order to bring ever greater benefits to consumers and businesses alike.



**The BEREC Office is an EU Agency supporting BEREC in the fulfilment of its mission to ensure the consistent implementation of the European regulatory framework for electronic communications. To achieve this, the BEREC Office contributes to BEREC's regulatory work and provides all necessary professional and administrative support, including financial, organisational and ICT services for the benefit of European citizens.**

The guiding principles that lead the BEREC Office to achieve our professional objectives:

|  |  |
|--|--|
|   | <p><b>Professionalism</b></p> <p>We are results-oriented and believe that by performing consistently to high standards we deliver value to BEREC and our stakeholders. Professionalism also means for us transparency and integrity in all our actions, working always with the highest level of ethics in our contribution to the interests of the organisation and stakeholders.</p> |
| <p><b>Efficiency</b></p> <p>We take pride in our work and strive for both efficiency and quality in everything we do. We are committed to using the resources available in the most efficient way.</p> |   |

|  |  |
|--|--|
|   | <p><b>Effectiveness</b></p> <p>We aim to contribute to the work of BEREC with real value through tangible and evident results.</p> |
| <p><b>Accountability</b></p> <p>We take responsibility for our actions and their outcome, both as individuals and as a team. We honour our commitments and obligations. We are held accountable to our constituency (and the public at large) regarding the adherence to the mission, the transparency of internal processes and the execution of our mandate.</p> |   |

The guiding principles of our behaviour in working with our colleagues and interacting with our stakeholders:

|   |  |
|---|--|
|  | <p><b>Teamwork</b> is the foundation of our organization. We share knowledge and expertise working cooperatively to achieve our goals. We foster collaboration while maintaining individual accountability.</p>  |
|  | <p><b>Diversity</b></p> <p>We respect and foster the diversity of our colleagues, BEREC community and the EU. We understand that each individual is unique and we recognize and value the different skills and strengths of our team. We believe that diversity fosters creativity and growth and we promote an open and respectful working environment.</p> |

More information on the BEREC Office tasks and mission can be found on the BEREC and BEREC Office website: <https://berec.europa.eu/en/berec-office/tasks-and-mission>.

## Section I – General Context

BEREC and the Office were established by Regulation (EC) No 1211/2009 of the European Parliament (EP) and of the Council<sup>9</sup>. BEREC replaced the European regulators Groups for Electronic Communications Networks and Services (ERG)<sup>10</sup>, and was designed to contribute to the development and the better functioning of the internal market for electronic communications networks and services by aiming to ensure the consistent implementation of the regulatory framework for electronic communications, in providing expertise and acting independently. BEREC acts as a forum for cooperation among the national regulatory authorities (NRAs) and between NRAs and the European Commission (EC) in the exercise of the full range of their responsibilities under the Union regulatory framework. BEREC also serves as a body for advice and debate for the EP, the Council and the EC in the field of electronic communications and related digital areas and legislative instruments such as the DMA and DSA.

The Office was established as a Community body with legal personality to carry out the tasks referred to in Regulation (EC) No 1211/2009, in particular the provision of professional and administrative support services to BEREC. In order to support BEREC efficiently, the Office was given legal, administrative and financial autonomy. It was expected to operate as a Brussels-based support office as the successor of the former ERG secretariat. By Decision 2010/349/EU<sup>11</sup>, the Representatives of the Governments of the Member States decided that the Office would have its seat in Riga, thus becoming a decentralised regulatory agency.

### Current policy context and legal base

BEREC and the Office have made a positive contribution towards the consistent implementation of the regulatory framework for electronic communications and actively contributed to adjacent digital policy and regulatory areas such as the DMA and DSA. In order to further contribute to the development of the internal market for electronic communications throughout the Union as well as to the promotion of access to, and take-up of very high capacity networks, competition in the provision of electronic communications networks, services and associated facilities and the interests of the citizens of the Union, the revised Regulation (EU) 2018/1971 (BEREC Regulation) aims to strengthen the role of BEREC and the BEREC Office. Such a strengthened role

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<sup>9</sup> Regulation (EC) No 1211/2009 of the European Parliament and of the Council of 25 November 2009 establishing the Body of European Regulators for Electronic Communications (BEREC) and the Office (OJ L 337, 18.12.2009, p. 1).

<sup>10</sup> Commission Decision 2002/627/EC of 29 July 2002 establishing the European Regulators Group for Electronic Communications Networks and Services (OJ L 200, 30.7.2002, p. 38).

<sup>11</sup> Decision taken by common accord between the Representatives of the Governments of the Member States of 31 May 2010 on the location of the seat of the Office of the Body of European Regulators for Electronic Communications (BEREC) (2010/349/EU) (OJ L 156, 23.6.2010, p. 12).

complements the enhanced role played by BEREC following Regulations (EU) No 531/2012<sup>12</sup> as amended and (EU) 2015/2120<sup>13</sup> and Directive (EU) 2018/1972<sup>14</sup>.

### **Duties and compliance obligations of the BEREC Office**

The BEREC Office is tasked to and contributes to BEREC's regulatory work and provides all necessary professional and administrative support services to BEREC. Furthermore, the Agency is also responsible for data gathering from the NRAs or other entities for BEREC needs, drafting regular reports on regulatory topics (for example international roaming, termination rates benchmarking). It also sets up and maintains registries and databases, establishes information and communications systems for BEREC, supports the smooth functioning of the BEREC working groups and of the Board of Regulators, etc.

The BEREC Office is tasked with ensuring compliance with the transparency obligations of BEREC, including implementing BEREC's communication strategy and deployment of all necessary tools for disseminating the outcome of BEREC's work.

In carrying out its duties, the BEREC Office is entitled to cooperate with competent Union bodies, offices, agencies and advisory groups, with competent authorities of third countries and with international organisations for the needs of the implementation of its mandate.

The BEREC Office has the obligation to comply with its founding act and other legal acts of the Union, including Regulation No 1 determining the languages to be used with the EU<sup>15</sup>.

### **Specificities for the programming period**

- **Specificities stemming out from legal acts and obligations**

Pursuant to Article 48 of the BEREC Regulation, the EC shall carry out an evaluation of the work of BEREC and the BEREC Office every five years to assess BEREC's and the BEREC Office's performance in relation to their objectives, mandate, tasks and location. The evaluation specifically addresses the possible need to modify the structure or mandate of BEREC and the BEREC Office, and the financial implications of any such modification.<sup>16</sup> Pursuant to Article 122 of the EECC, by end of 2025, the EC shall review the functioning of the EECC and report to the European Parliament and to the Council. The outcome of the evaluation and review may impact

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<sup>12</sup> Regulation (EU) No 531/2012 of the European Parliament and of the Council of 13 June 2012 on roaming on public mobile communications networks within the Union (OJ L 172, 30.6.2012, p. 10).

<sup>13</sup> Regulation (EU) 2015/2120 of the European Parliament and of the Council of 25 November 2015 laying down measures concerning open internet access and amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services and Regulation (EU) No 531/2012 on roaming on public mobile communications networks within the Union (OJ L 310, 26.11.2015, p. 1).

<sup>14</sup> Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (see page 36 of this Official Journal).

<sup>15</sup> OJ 17, 6.10.1958, p. 385

<sup>16</sup> BEREC has published its input to the EC's evaluation in September 2023, cf. to document "BEREC input to the European Commission on the functioning of BEREC and BEREC Office in view of the evaluation under Article 48 of the BEREC Regulation", BoR (23) 114.

the tasks of the BEREC Office during the programming period. The BEREC Office, in support to BEREC, stands ready to take on additional responsibilities aligned with developments in the electronic communications sector.

More recent changes in relevant EU legislation, such as on international mobile roaming or other developments on open internet, as well as initiatives for facilitating cooperation between the EU and neighbouring and candidate countries, for example in the domain of international mobile roaming with Western Balkan territories, add further duties to BEREC and consequently to the BEREC Office. Ongoing legislative processes and their implementation in other digital domains such as in the areas of digital markets and digital services might also increase the duties of BEREC and the BEREC Office. More recent EU focus areas such as increasing the resilience and security of communication networks might further impact BEREC's work. These changes will require a re-consideration of overall resources and prioritisation of projects during the programming period.

- **Specificities related to the implementation of the new Cybersecurity Regulation**

The BEREC Office is confronted with a very high cybersecurity threat level due to its location and due to the telecommunication mandate of BEREC. There is a high risk of malicious state and non-state actors using the BEREC Office as the weakest link in the chain to get access not only to information and data of the Agency, but also to other EU institutions, the systems of NRAs and telecommunication operators. The high cybersecurity threat level combined with the overall small amount of financial and human resources, given that the BEREC Office is one of the smallest EU agencies, puts the BEREC Office and BEREC in a very particular and challenging situation.

Due to the high cybersecurity threat level, timely implementation of the Cybersecurity Regulation is vital. The BEREC Office conducted a thorough analysis of its specific resource needs in this regard. To effectively counter these threats and implementing the new mandatory tasks under the Cybersecurity Regulation necessitates two Full-Time Equivalent (FTE) positions. Given the Agency's historical shortness of adequate human resources since its inception, in particular in these areas, the Management Board mandated the BEREC Office to allocate one FTE in 2025 to address the most pressing needs and to serve as Local Cybersecurity Officer. This decision was taken after the Office exhausted all internal redeployment possibilities as well as all available support from central services and other bodies.

In 2026, a second FTE will be required to fulfil the tasks and obligations stemming from the regulation. In parallel, the BEREC Office is working on alternative solutions, putting significant effort in co-operating with other bodies and central services. In case the BEREC Office would obtain operational support from other central services and bodies in 2026 and could use new corporate solutions that are under development, the BEREC Office could rely on these resources provided it receives the necessary financial resources.

- **Specificities related to the premises project**

In July 2024, recognizing that any decision regarding the premises would entail long-term financial implications due to the nature of the project, the new Director of the BEREC Office has initiated a comprehensive review of the overall premises project. The objective of this approach was to provide the Management Board with updated information and a sound evidence-base to prepare an informed decision making.

The BEREC Office has received the cost estimate for refurbishing the existing premises in the beginning of March 2025, and has also contacted the European Parliament to clarify the status of the House of Europe project. Based on the information received, retaining the current premises is considered the most cost-effective solution. This approach would involve undertaking all necessary security enhancements to ensure, to the extent possible, compliance with the European Commission's security requirements. It would also include undertaking the most critical building refurbishments to allow the staff to stay in the current premises.

This approach would be the most cost-effective solution with a required budget of EUR 244,066.31 as a one-time investment for security improvements, and an investment of EUR 1,715,969.50 to be spread over a 10-year period.

## Section II – Multi-annual programming 2026-2028

### II.1. Multi-annual work programme

As the main task of the BEREC Office is to assist BEREC, it needs the necessary capacity and resources to support all BEREC activities. This includes the financial means to finance BEREC operations, activities and in particular a highly qualified team that has the necessary expertise to effectively and efficiently support the increasing demands of the BEREC Board of Regulators and its preparatory bodies: the Contact Network and the BEREC Working Groups (WGs).

Pursuant to the Article 122 of the EECC, by 21 December 2025 and every five years thereafter, the EC shall review the functioning of the EECC and report to the European Parliament and to the Council. BEREC is, therefore, ready to engage in this process as well as any other sectoral legislative initiative where BEREC's role is thought. Furthermore, BEREC will review three strategic documents to set out its objectives for the period 2026-2030 taking account of the latest and expected relevant market, technological and regulatory developments during that period.

To implement the outcome of the EECC review and the BEREC strategy, the focus of the BEREC Office consists in maintaining and further securing the necessary HR resources, along with the development of the required evidence base on digital markets, maintain existing and developing new applications, portals and databases to support BEREC's future demanding tasks. This requires the staff of the BEREC Office to have the necessary skills to effectively analyse and address future changes in technology, market and regulatory developments. As one of the tasks of the BEREC Office is to collect and analyse data to draft benchmark reports, expertise in data analysis is considered crucial. On top of this, the BEREC Office strives to further improve working methods, increase its productivity as well as the quality of its outputs. In this respect, the BEREC Office will continue to apply its *Smart Agency* concept in the programming period, in three domains<sup>17</sup>:

- people;
- processes and way of working;
- infrastructure and facilities.

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<sup>17</sup> An own initiative with four target features: being 'knowledge based', 'modern', 'environmental friendly' and 'efficient' in those three domains.



The key performance indicators (KPIs) are identified and set accordingly, as follow:

| Objectives   | KPIs                                    | Measure   | Target   |
|--|---|---|--|
| <b>Maintain appropriate capacity for supporting existing and new BEREC tasks and activities</b>                            | Fully staffed indicator                 | Number of Temporary Agents (TAs), Contract Agents (CAs), Seconded National Experts (SNEs) and interim staff / max. number of a fully staffed BEREC Office | 100%   |
| <b>Improve the quality of work of BEREC by assisting with improving its working methods and the quality of its outputs</b> | Quality of support to BEREC and its WGs | Measure quarterly the level of satisfaction of the BEREC Chair and the BEREC WGs Co-Chairs on a 5-grade scale on the basis of multiple questions          | Minimum 85% of responses are in the top 2 scores |
| <b>Develop and manage tools to operate effectively and efficiently</b>   | Availability rate of supporting tools   | Percentage of time of proper operation of BEREC website, email server, BERECNet+, Information sharing portal, public consultation platform, etc.          | Minimum 95%                                      |

## II.2. Human and financial resource – outlook for the years 2026-2028

### II.2.1 Overview of the past and current situation

The requirement of adequate staffing of the BEREC Office derives from the BEREC Regulation. In particular, Recital 33 foresees that the BEREC Office should be adequately staffed for the purpose of carrying out its duties. All tasks assigned to the BEREC Office, including professional and administrative services supporting BEREC in carrying out its regulatory tasks, together with compliance with the financial, staff and other applicable regulations (for example, data protection, EC security rules) and the increased weight of operational tasks should be duly assessed and reflected in the resource programming.

In addition, Article 31 of the BEREC Regulation obliges the Agency to have the staff required to carry out its duties in accordance with the principle of activity-based budgeting and management of human resources. It foresees that the number of staff and corresponding financial resources

shall be proposed in accordance with Article 23(2) and (4) and Article 24(1), taking account of Article 4 (n) and Article 5 with the tasks assigned to the BEREC Office by the BEREC Regulation or by other Union legal acts, as well as the need for compliance with the regulations applicable to all Union decentralised agencies.

Therefore, in line with Article 23 (2) of the BEREC Regulation and in relation to Article 31, the BEREC Office, in cooperation with the BEREC Office Advisory Group, ran a bottom-up staffing exercise in 2020-2021 for each activity performed by the Agency, which was later-on approved by the Management Board. The exercise was done with the presumption that the BEREC Office will continue to use the EC services for key administrative and auxiliary task, as listed in section 7 Strategy for achieving efficiency gains of the 2022 Consolidated Annual Activity Report (CAAR).<sup>18</sup>

The outcome of the bottom-up staffing exercise demonstrated that to perform its tasks as defined at that time the Agency needed 47 people, not considering the FTEs needed to implement the Cybersecurity Regulation. Consequently, the staff available at the Agency at that time, namely: 16 Temporary Agents (TAs), 22 Contract Agents (CAs) and 9 Seconded National Experts (SNEs) were found as required in their number taking into account the externalisation of numerous administrative functions to the EC services. However, in 2022, the EC services informed the BEREC Office of terminating the provision of accounting services. As a result, the number of the TAs was increased in the establishment plan from 16 to 17 as of 1 July 2023, to enable the Agency to internalise the Accounting Officer function, resulting in a total headcount of 48.

Due to long-term absence of one of the Agency's statutory staff, a CA FG IV has been employed under an employment contract with a limited perspective in time for a fixed period of one year during the course of 2025. Furthermore, one additional CA FG IV for cybersecurity is added in 2025 to start working on the implementation of the Cybersecurity Regulation.

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<sup>18</sup>See, MB (23) 50, <https://bereg.europa.eu/en/document-categories/bereg-office/bereg-office-activity-reports/2022-consolidated-annual-activity-report-of-the-bereg-office>

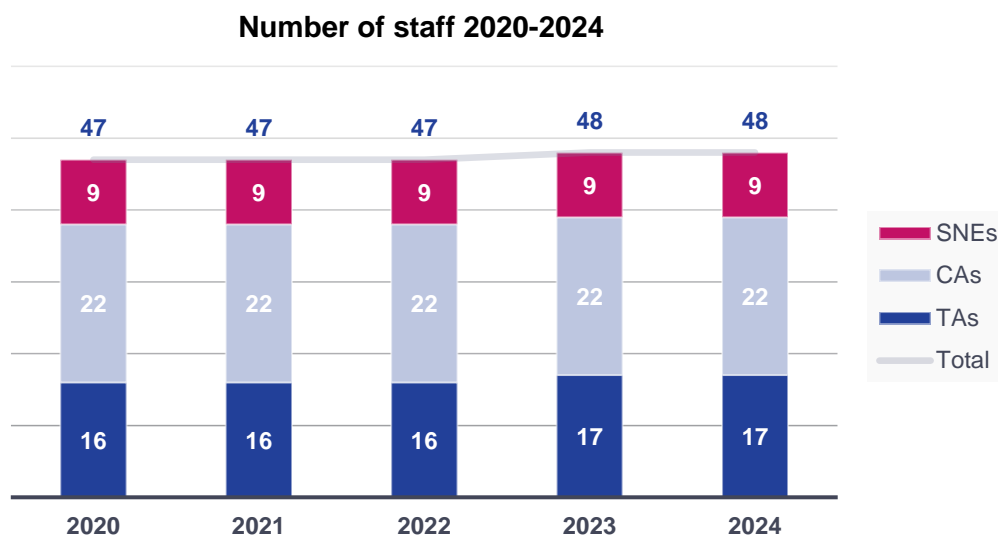


Figure 1 - Number of staff 2020-2024

However, while the overall staff numbers remain stable over the last five years, the number of establishment plan posts at the BEREC Office remains significantly below the actual needs of the Agency. The Agency currently only disposes of a total of 17 Temporary Agents (14 ADs and 3 ASTs), which is the lowest among all EU decentralized agencies. For instance, EIGE, which is also a small-sized decentralized agency, has an establishment plan of 27 TA posts. As a result, the BEREC Office needs to fill many key jobs which normally would be assigned to TA posts using external staff<sup>19</sup>, which makes those jobs less attractive, leads to high staff turn-over and poses challenges in ensuring a high-quality work delivery.

Since 2020 the BEREC Office annual budgets, which consist mainly of the EU subsidy, amount to 7-8 million EUR. As a general principle, each year the subsidy of the decentralised Agencies is subject to the standard average increase of 2%. In 2024, an additional subsidy of EUR 81,594 was granted to smaller Agencies in order to partially address a higher than usual annual indexation. Currently available information shows that a similar increase in subsidy will be needed also in the year 2026 to balance higher costs. In addition to this and given its overall small budget, the BEREC Office needs to request an increase in subsidy for the two following items: A one-off increase in subsidy for the year 2026 for the SUMMA project on-boarding and associated costs for the amount of EUR 324,000 as well as an increase in subsidy amounting to EUR 200,550 to cover two Contract Agent posts to implement and start being compliant with the new Cybersecurity regulation as well as properly protecting the integrity and security of the ICT systems of BEREC Office and therewith also of BEREC and the sector as a whole. Given the sensitivity of the task, it cannot be outsourced. All internal redeployment possibilities as well as all existing support from central services and other bodies have been exhausted. The two

<sup>19</sup> CAs and SNEs

additional Contract Agent posts are paramount for ensuring that cybersecurity is maintained at an appropriate level. Under all circumstances, any cybersecurity attack must be prevented as the costs thereof are much higher than taking the necessary precautionary steps in line with the Cybersecurity Regulation.

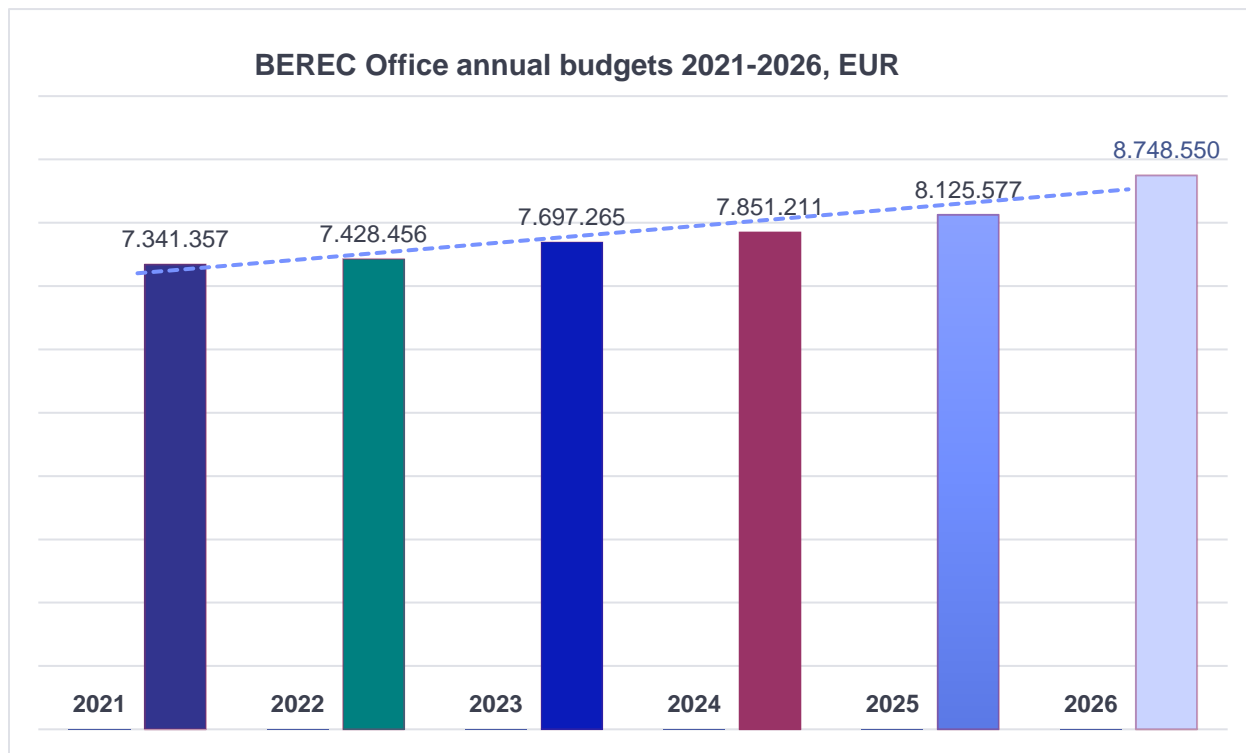


Figure 2 - BEREC Office annual budgets 2021 - 2026, EUR

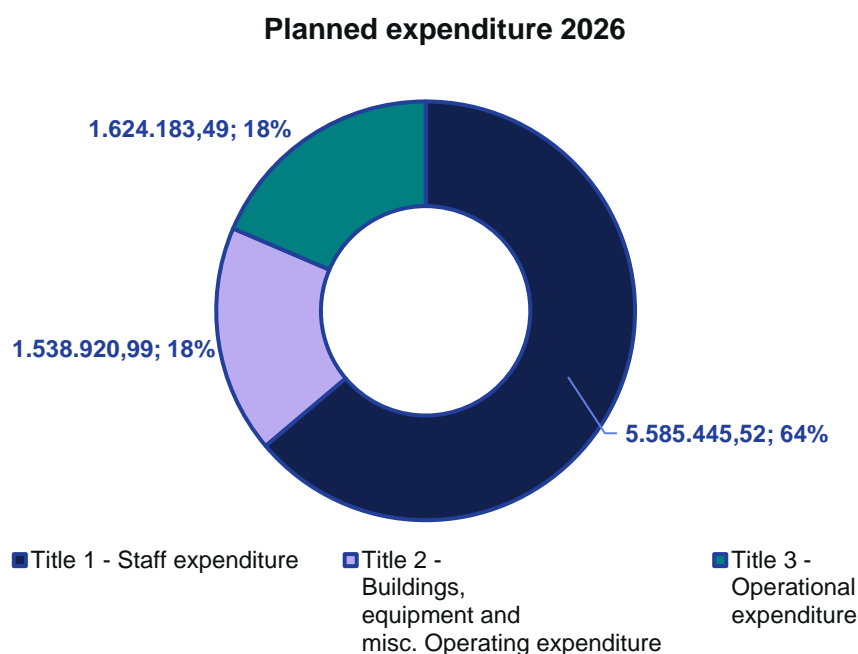


Figure 3 – Planned expenditure 2026

More details on the projection of the financial resources are provided in Annex III: Financial Resources 2026-2028.

## II.2.2 Outlook for the years 2026-2028

### II.2.2.1 New tasks (if applicable)

#### New tasks on the operation side (support to BEREC)

Pursuant to Article 48 of the BEREC Regulation, the European Commission shall carry out an evaluation of the work of BEREC and the BEREC Office. In addition, and pursuant to Article 122 of the EECC, the EC shall review the functioning of the EECC by end of 2025, and report to the European Parliament and to the Council. The outcome of the evaluation and review may impact the tasks of the BEREC Office during the programming period.

Where and if a new task is assigned to BEREC or to the BEREC Office, the Management Board shall consider the need of amendment of the annual programming document, as required by the provisions of Article 23 (3), 1<sup>st</sup> paragraph of BEREC Regulation.

#### Sustainability aspects

The Sustainability Expert Networking Group (SUS ENG) prepared in 2024 a Greening Action Plan (GAP) for BEREC and for the BEREC Office. This GAP aims to identify the sources of the Green House Gas (GHG) contributors and proposes measures for ameliorating the environmental footprint in line with the European Green Deal and the 2030 climate and energy framework. This GAP was approved by the BEREC MB in early 2024 (i.e. at the 58th plenary meeting). Based on the methodology described in the GAP, the critical parameter for the environmental footprint of BEREC is the direct GHG contributions due to air-travel of meeting participants. For the BEREC Office, the critical parameters for its environmental footprint are the direct GHG contributions from air travel of staff for their missions given the location of the Office, the premises including electricity and gas, as well as staff commuting to the office.

Since 2018, the BEREC Office measures annually the GHG contributions of the operation of the Agency as well as of the operation of BEREC. These contributions amount to ~290 tons for BEREC in 2023, the first year of normal operation after the COVID pandemic. The GHG contributions for the BEREC office was ~57 tons for the same year. These numbers will have to be reduced to less than 220 tons for BEREC and less than 53 tons for the BEREC Office in order to achieve the target set by the 2030 climate and energy framework. Due to the increased work activity involving numerous physical meetings in 2024 the GHG contributions of BEREC and of the BEREC Office increased. The GAP is proposing a series of measures for reducing the GHG contributions of BEREC and of the BEREC Office as well as other ways to improve the environmental footprint (i.e. green procurements, recycling, carbon offsetting, etc.) aiming to achieve carbon neutrality by 2030 or earlier. On the top of these, it has been decided by the BEREC MB, at its 61st plenary meeting, that the Agency commits to the actions of the Green Charter of the EU Agencies Network and to become EMAS certified (i.e. EU Eco-Management and Audit Scheme) by the end of 2025. These commitments set ambitious targets for the BEREC Office to closely monitor its environmental footprint and implement corrective actions whenever necessary

### **II.2.2.2 Growth of existing tasks**

BEREC's presence on relevant digital platforms and the correct representation of the work of BEREC is increasingly important in our fast-paced digital World. To further implement the BEREC Regulation Article 37 on transparency and communication, and in line with the BEREC Communications Strategy's objectives, between 2026 and 2028, the BEREC Office will continue its efforts in enhancing BEREC's/BEREC Office digital presence (website, social media) and sharing the results of its work with stakeholders and interested parties. In recent years, the BEREC Office has put significant resources into the development of the new website, and launched it in July 2024. The new website has almost twice as many content pages as the old version, featuring multiple dynamic entry points and interactive content blocks on its landing page and visually user-friendly pages. Besides new content drafting and updating, the new website requires editorial planning and revision of the content. The BEREC Office continues to prioritize

the digital communications activities enabled by the enhanced, upgraded and expanded new website design and content, aiming at the implementation of a centralised approach to its management. However, the enhanced, upgraded and expanded new website, together with the multilingual features and centralised approach for efficient management require additional resources of at least half an FTE. The additional resources (another half FTE) is required for strengthening, enhancing and expanding BEREC/BEREC Office presence on social media, and, paying particular attention to security aspects with a view of detecting and countering misinformation, including deep fake and false news.

## **II.2.3 Resource programming for the years 2026-2028**

The number of staff and corresponding financial resources presented in the current document for the period 2026-2028 are proposed in accordance with the provisions of Article 23(2) and (4) and Article 24(1), taking account point (a) of Article 5 and all other tasks assigned to the BEREC Office by the BEREC Regulation or by other Union legal acts, as well as the need for compliance with the regulations applicable to all EU decentralised agencies.

The resource allocation has been provided in accordance with the principle of activity-based management of human and financial resources and has been made on the basis of the following considerations.

### **II.2.3.1. Financial Resources**

The 2026 sources of revenue for the BEREC Office budget are the contribution from the EU and contributions from third countries, which are estimated as follows:

| <b>Contribution from the Union</b>  | <b>EUR</b>          |
|---|---------------------|
| <b>Main EU subsidy 2026:</b>  | <b>8,748,550.00</b> |
| <b>Assigned revenues deriving from previous years surpluses:</b>          | <b>p.m.</b>         |
| <b>Third countries contribution (incl. EFTA and candidate countries):</b> | <b>p.m.</b>         |
| <b>Other contributions (Member States<sup>20</sup>, NRAs, etc.)</b>       | <b>p.m</b>          |
| <b>Other revenue from administrative operations</b>                       | <b>p.m</b>          |




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<sup>20</sup> Incl. voluntary financial contribution from the Member States

|                    |                     |
|--------------------|---------------------|
| <b>TOTAL 2026:</b> | <b>8,748,550.00</b> |
|--------------------|---------------------|




The financial resources for years 2026 – 2028 are planned to cover the following expenditure:

**Title 1 Staff expenditure:**

|   |  |
|---|--|
|    | <ul style="list-style-type: none"> <li>Expenditure for staff based on the number of staff planned for the programming period and associated costs, incl. adjustments of the automatic step, possible reclassifications and potential impact of indexation, as per information received in 2026 EC's Budget Circular. No increase in the country's correction coefficient is estimated in the current financial resources planning, although the coefficient remains the lowest among the Baltic States as well as compared to the actual cost of living in Riga, which is the largest capital city among the Baltic States. In order to cover the estimated increase in indexation as communicated in 2025 EC's Budget Circular, the BEREK Office is to request additional resources amounting to EUR 56,000.00 in order to cover this impact on the payroll.</li> </ul> |
|  | <ul style="list-style-type: none"> <li>Additionally, as of 2026 onwards the Agency is requesting additional EUR 200,550.00 to cover the needs of the 2 additional Contract Agent post to be assigned the new tasks arising from the Cybersecurity regulation. For more information please see section II.2.1 ;</li> </ul>  |
|  | <ul style="list-style-type: none"> <li>Expenditure for external services (including those provided by the European Commission (EC) Services, temporary financing of multi-lingual tuition for the children of the staff, social welfare services, etc.), adjusted with the inflations rates.</li> </ul>  |








**Title 2 Buildings, equipment and miscellaneous operating expenditure:**

|   |  |
|---|--|
|    | <ul style="list-style-type: none"> <li>• Purchase, rent, maintenance, installation and deployment of ICT and security equipment, software, hardware, connectivity, digital certificates, including for database set-up, maintenance and management; external data processing services, including fees for IT systems and applications offered by the EC services.</li> <li>• As a result of the evaluation of the premises project, additional resources will be needed in 2026 for mandatory security enhancements and maintenance of the current premises.</li> </ul>        |
|    | <ul style="list-style-type: none"> <li>• Agency's legal and other operating expenditure, including external audit and/or consultancy services expenditure arising from the Headquarters Agreement and SLAs with Latvian authorities and others. The Agency is also requesting a one-time increase in subsidy to cover the high associated costs of SUMMA on-boarding of EUR 324,000 (to cover the 200,000 EUR onboarding fee and additional overhead costs of introducing SUMMA such as the update of existing financial and accounting systems and staff training)</li> </ul> |
|  | <ul style="list-style-type: none"> <li>• Costs of internal and external communications activities, incl. for the organisation of events, production of audio-visual and digital content, publications and branded items and others.</li> </ul>   |

**Title 3 Operational expenditure:**

The appropriations of Title 3 will be used for financing the activities in support to BEREC, as follows:

|   |   |
|---|---|
|  | <ul style="list-style-type: none"> <li>• Supporting the activities of the BEREC Working Groups (VGs) and facilitating the work of the Expert Networking Group (ENG) on Sustainability, organising meetings, workshops, including ad hoc meetings for Article 32/33 phase II cases and reimbursing travel and accommodation expenses of the meeting participants;</li> </ul> |
|---|---|

|   |   |
|---|---|
|    | <ul style="list-style-type: none"> <li>Information gathering and distribution that comprise the following: provision of services related to subscriptions to regulatory databases, trainings to the national regulatory authorities' experts on regulatory issues and other relevant topics, language services necessary for BEREC work, maintenance of information data bases and on-line platforms necessary for the work of BEREC WGs, commissioning of studies specified in the BEREC Work Programme and other projects required for BEREC work;</li> </ul>   |
|    | <ul style="list-style-type: none"> <li>Expenditure for meetings of the BEREC Board of Regulators, the Management Board of the BEREC Office, and respectively their Chair and Chairperson and Vice-Chairs and Deputy Chairpersons, the Contact Network including reimbursements to meeting participants;</li> </ul>  |
|   | <ul style="list-style-type: none"> <li>Provision of licenses, hardware, IT support and business continuity service to BEREC, management of multiple information and communications systems for BEREC needs, such as the platform for collaboration - BERECNet+, General Authorisation Database, Value Added Services database, Emergency means database, the public BEREC website, purchase and maintenance of other IT applications and tools (for example, audio video conferencing rooms, electronic voting tool, analytical platform/tool for roaming data collection etc.), establishment and maintenance of databases in accordance with the EECC and Roaming Regulation, facilitating the activity of ICT ENG and others.</li> </ul> |
|  | <ul style="list-style-type: none"> <li>Implementation of the BEREC external communications strategy, including by organising high level stakeholder events and public briefings, strengthening BEREC's digital presence and engagement with the stakeholders via producing publications, audio-visual and digital content, implementation of a multilingual policy, facilitating the activity of BEREC Communications ENG, etc.</li> </ul>  |

### II.2.3.2. Human Resources

Since 1 July 2023, the BEREC Office operates with 17 Temporary Agents (TA) posts in its establishment plan, which is below the required number for mandatory profiles. To address this shortage, the Agency will rely on external staff, including Contract Agents and Seconded National Experts, as well as external service providers for certain tasks, such as security and cleaning services, which are not envisioned to be established at the Agency.

Following the reorganisation of the BEREC Office, effective 1 January 2024, and the strengthening of the main Unit providing support to BEREC with an additional data analyst capacity, in the programming period 2026-2028, the Agency's management will focus on stabilising existing functions and implementing the measures to retain key staff identified jointly with the local authorities within the Headquarters<sup>21</sup> and Service level agreements<sup>22</sup> with the Government of Latvia. The Agency, with continue to implement its social welfare plan for staff, in close collaboration with the Latvian authorities, to improve working and living conditions in the host Member State, including establishment of an accredited European School in Riga or its vicinity.

It should be recalled that the limited size<sup>23</sup> of the Agency requires the use of a multitasking approach, which makes the assignments of staff more demanding than in other bodies of the EU. These challenges, in combination with other factors, such as the lowest<sup>24</sup> correction coefficient for Latvia among the Baltic States and difficulties in the establishment of the family members of the staff in the host country, tend to contribute to the difficulties in attracting and retaining staff who are not Latvian citizens and residents, especially in the lower grades.

Therefore, in addition to the implementation of the projects oriented to increasing the attractiveness of the Agency with the host Member State under the Headquarters and Service level agreement, during the programming period, the Agency should also explore the possibility for converting some of the Contract Agent (CA) posts into Temporary Agent (TA) posts as well as converting some SNE<sup>25</sup> posts into CA posts at the latest with the new Multiannual Financial Framework to start after 2027. This strategy could be linked to the expected outcome of the BEREC and BEREC Office evaluation under Article 48 of the BEREC Regulation, as well as the review of the legal framework for electronic communications expected in 2025.

Despite these challenges, the primary objective for the period 2026-2028 is to ensure a stable working environment for staff, maintaining motivation and minimizing staff turnover. To achieve

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<sup>21</sup> Ares(2021)3922814 - Headquarters Agreement between the Agency for Support for the Body of European Regulators for Electronic Communications and the Government of the Republic of Latvia

<sup>22</sup> Ares(2022)4676181 - Service Level Agreement between the Agency for Support for the Body of European Regulators for Electronic Communications and the Government of the Republic of Latvia

<sup>23</sup> The Agency has the smallest establishment plan among the EU Decentralized Agencies

<sup>24</sup> During the course of 2024 the correction coefficient for Latvia decreased two times: i) 3,2% decrease as of 1 Jan 2024; ii) 0.7% as of 1 Jul 2024

<sup>25</sup> In the last two SNE Calls (BEREC/2024/02 and BEREC/2021/06) for applications, the Agency faced serious issues in receiving an adequate number of eligible applications

this goal, the BEREC Office may further need to increase flexibility measures to retain existing staff and increase staff diversity at the BEREC Office. In addition, as the professional support to BEREC is highly dependent on the availability of SNEs from the national regulatory authorities, the situation of SNE engagements will be closely monitored during the programming period and mitigating actions will be initiated in case of risks of non-availability of experts. Such measures will include promoting the benefits of SNE positions among the NRAs, extending secondment periods, using the valid reserve lists, running targeted selection procedures for the specific SNE profiles and employing interim workers to cover interruptions between secondment periods.

Following the entry into force on 7 January 2024 of Regulation (EU, Euratom) 2023/2841 of the European Parliament and of the Council of 13 December 2023 laying down measures for a high common level of cybersecurity, new mandatory tasks have been assigned to the BEREC Office. These tasks require 2 additional FTEs: one additional FTE was introduced in 2025, leaving one more FTE needed, specified as CA - FG IV.

The premises project might further have a temporary impact on the increased needs of certain specialised functions. These needs will be addressed either via contracts for external services (including concluded by the lead contracting authority)<sup>26</sup> and/or via the use of interim workers.

More details on the required resources for 2026-2028 per activity are presented in Annex II.

## **II.2.4 Strategy for achieving efficiency gains**

### **II.2.4.1 Introduction**

The BEREC Office is an EU Agency with limited capacity on the administrative side due to its small size. Therefore, since its establishment, the BEREC Office has seen the outsourcing of administrative and auxiliary tasks as the main means for filling in missing capacities, where possible, and achieving efficiency gains (both quantitative and qualitative).

The BEREC Office has already signed multiple Service level agreements (SLA) and Memoranda of Understanding with the European Commission (EC) Services, other Agencies of the EU and the Government of the host Member State for use of administrative services or sharing capacities in the field of meeting organisation and expert reimbursement, IT and security, procurement, translations, interpretation, payroll and management of individual entitlements of staff, missions, HR management, learning and development activities (incl. induction of new comers), medical services, etc.

The BEREC Office is largely dependent on IT-technology, viewing information and communication technologies (ICT) as a key enabler for the regulatory work that it carries out in support to BEREC and for its day-to-day operations. The availability of all data in digital format,

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<sup>26</sup> For example, contract with local architects, legal or real estate consultants

as well as appropriate data structures and data management systems, will ensure ease of access and automation in the processing of that data.

The Agency will maintain and, where possible, further expand the efficiency gains already in place by making use of joint procurement with the EC, other bodies of the EU and the host member state, use of EC IT applications and others.

#### **II.2.4.2 Strategy for achieving efficiency gains and synergies in the field of procurement**

Joint purchasing arrangements can give rise to efficiency gains. In particular, due to economies of scale they can lead to cost savings such as lower purchase prices or improved client services for the same price. Moreover, joint procurement arrangements may give rise to qualitative efficiency gains by leading suppliers to innovate and introduce new or improved products or services on the market.

Therefore, during the programming period, the BEREC Office will join as many inter-institutional procedures as possible for the provision of goods and services that the Agency may need for its administrative and operational projects.

For its administrative needs, the BEREC Office will also reply to joint procurement projects with the Government of the host Member State.

#### **II.2.4.3 Use of services and capacities offered by the EC and the Latvian public authorities**

As referred to before, the BEREC Office has some missing capacities, which could be addressed via synergies with the EC services and the Latvian public authorities, to the extent possible, under conditions agreed in Service Level Agreements (SLAs).

However, the experience in sharing capacities with other EU agencies has proved to be an unreliable source of compensating missing capacities, as in most of the cases these SLAs have been terminated unilaterally by the agency providing the services to the BEREC Office. Therefore, during the next programming period, the BEREC Office will invest its efforts in developing stable relations with the EC and the local authorities to ensure that it obtains all services needed for its smooth running.

The main objective will be to ensure a smooth running of the Agency, while achieving qualitative and quantitative efficiency gains, including improving the living conditions for staff and their families in the host member state.

#### **II.2.4.4 Outsourcing of technical and auxiliary tasks to external service providers**

The achieving of the efficiency gains listed above, the Office is strongly dependent on external parties and reaching appropriate agreements with them.

If the BEREC Office does not reach an agreement for the implementation of these measures, it will outsource technical and auxiliary activities, to the extent possible, to economic operations following procurement procedures. The implementation of this measure will be considered as last resort in case all other above listed measures for achieving efficiency gains have failed.

#### **II.2.5 Negative priorities / decrease of existing tasks**

The Agency focuses its resources on delivering the basic mandate, i.e. providing support in preparing the deliverables included in the annual BEREC work programme.

The following priorities are expected to be considered when allocating the Agency's resources:

- Deliver the basic mandate through providing support to the Board of Regulators and to the BEREC Working Groups.
- Deploy and maintain collaboration, document management and ICT (e.g. hybrid meeting facilities, e-voting, etc.) solutions in support to BEREC.
- Facilitate a high level of interaction with stakeholders and with the general public, to maintain the reputation of BEREC. Between 2026 and 2028, the BEREC Office aims to enhance its digital presence and share its work results by strengthening the office's social media presence.
- Establish appropriate data structures, data management systems and data scientist/analyst skills.
- Maintain the minimum necessary compliance with the rules applicable to the EU agencies (financial, staff, security, personal data protection, etc.).

The BEREC Office will further decrease its expenses by undertaking the following actions:

- Utilising the benefits of virtual meetings,
- Participating in on-line trainings instead of physical ones,
- Benefiting from internal capabilities instead of external service providers in projects when feasible.

In addition to this, potential negative priorities are identified that could be activated in case of financial constraints, as follows:

- Lessen the ambitions as external studies are concerned. Envisage a maximum of EUR

100,000 per year, aligned with the deliverables in the relevant annual work programme, preferably with a final decision on it in the first half of the given year.

- Suspend external training courses to junior NRA experts. Internal workshops or information sessions could be organised instead, before restarting a structured training programme by a specialised external training provider.
- Postpone or cancel the organisation of the Mini Board study trip.
- Organise more virtual meetings instead of physical or hybrid meetings, when the agenda allows, and when the number of meeting participants would not reach the sufficient minimum.
- Lower the BEREC Office contribution to the organisation of high-level meetings
- Minimize the external costs related to the EMAS certification of BEREC Office while continuing all internal efforts for reducing the environmental footprint of the Agency and using synergies and the experience of other EU bodies for proceeding towards the certification.



## Section III – Annual Work Programme 2026

### III.1. Executive Summary

In accordance with its mandate, the BEREC Office will continue providing comprehensive support for the work of BEREC in fulfilling its mission to contribute to the better functioning of the internal market for electronic communications and to ensure the consistent application of the EU regulatory framework, thus supporting the successful implementation of the EECC<sup>27</sup>. This annual work programme outlines the Agency's priorities for 2026 and provides an overview of the activities planned by the BEREC Office to attain its objectives and KPIs.

The activities in the BEREC Office AWP for 2026 are split into the following main groups:

- operational activities;
- horizontal activities.

The activities in the Annual Work Programme (AWP) are developed in such a way to contribute to the achievement of the multi-annual objectives outlined earlier in Section II.

**Operational activities** of the BEREC Office directly relate to the mission and core tasks of the agency and include all actions undertaken by the BEREC Office in support to BEREC's work.

#### **Support to the work of BEREC, the BEREC Working Groups (WGs), the Sustainability Experts Networking Group (ENG) and phase II cases**

This activity includes supporting the BEREC WGs in their activities to fulfil the BEREC WP, which may include, but is not limited to contributing to the drafting of their reports (e.g. benchmark reports), supporting BEREC's work under Articles 32 and 33 of the EECC, ensuring high-level quality and consistency of the BEREC opinions and other material, as well as the organisation of public consultations. In addition, the BEREC Office is responsible for data collection exercises, as well as the management and analysis of the data (e.g. for roaming and intra-EU communications). An additional significant pillar of this activity consists in the organisation of workshops and events, as well as the organisation, preparation of and follow-up to the multiple

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<sup>27</sup> Directive (EU) 2018/1972 of the EP and of the Council of 11 December 2018 establishing the European Electronic Communications Code, OJ L 321, 17.12.2018, p. 36–214 (BG, ES, CS, DA, DE, ET, EL, EN, FR, GA, HR, IT, LV, LT, HU, MT, NL, PL, PT, RO, SK, SL, FI, SV) ;  
<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1546582829499&uri=CELEX:32018L1972>



WG meetings and ad-hoc WG meetings. Finally, this activity covers the facilitation of the functioning of the Sustainability Expert Networking Group (ENG).

### **High level meetings and support to the Boards**

This activity includes supporting the Board of Regulators (BoR), the Mini Board, the BEREC Office Management Board (MB), and respectively their Chair and Chairperson and Vice-Chairs and Deputy Chairpersons, the Contact Network (CN), and the BEREC Office Advisory Group (BAG) in fulfilling their assignments, especially in preparation of the BoR, MB and CN meetings, the BEREC meetings with the EU institutions, high-level BEREC workshops, events attended by the Chair and Vice-Chairs on behalf of BEREC as well as international events.

### **Information and communication technologies (ICT) support to BEREC**

This activity includes ICT support to BEREC and its preparatory bodies, purchase and maintenance of software and hardware and ensuring business continuity for BEREC. This activity also covers maintaining the BEREC Website, the internal platform for collaboration (BERECNet+), developing and maintaining other IT applications and tools (for example, audio video conferencing rooms etc.), portals, platforms and connectivity and provision of ICT support for end-users linked to operational information systems and their maintenance. It further covers the establishment and maintenance of databases required by the EECC, the BEREC Regulation and the Roaming Regulation<sup>28</sup> (GADB<sup>29</sup>, numbering databases, Value Added Services and Emergency means databases<sup>30</sup>) as well as appropriate means of storing and handling data.

### **Information gathering and distribution**

This activity comprises procuring and managing the necessary services, such as subscription services to different databases and data sources, for example, telecommunications and digital economy intelligence services, purchasing studies following the request of BEREC, provision of public consultations and surveys portal, any other necessary tools to assist in the WG activities and deliverables. It also includes provision of necessary data sets to support, for instance, the Remedies and Market Monitoring WG work, maintenance of a general Information Sharing Portal, collection of links, such as links to NRAs' open data portals, as well as training courses for NRAs' experts and the coordination of the preparation of the BEREC annual reports.

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<sup>28</sup> Regulation (EU) 2022/612 of the European Parliament and of the Council of 6 April 2022 on roaming on public mobile communications networks within the Union, OJ L 115, 13.4.2022, p. 1–37 (BG, ES, CS, DA, DE, ET, EL, EN, FR, GA, HR, IT, LV, LT, HU, MT, NL, PL, PT, RO, SK, SL, FI, SV); <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R0612&qid=1663763447134>

<sup>29</sup> <https://gadb.berec.europa.eu/>

<sup>30</sup> <https://berec.europa.eu/en/berec/berec-databases-of-numbering-ranges-for-value-added-services-and-means-of-access-to-emergency-services-for-roaming-users>

## **BEREC communications activities**

These activities ensure maximum internal and external transparency and accountability of BEREC activities, strengthening its digital presence and engagement with stakeholders and include the implementation of the BEREC External Communications Strategy and annual communications plans, the management of the digital communications tools and activities via the new BEREC website and social media accounts, the management of media and stakeholders relations, and the organisation of public events. It also covers the mandate and tasks of the BEREC Communications Expert Networking Group.

**Horizontal activities** (or cross-cutting activities) are carried out in support to operational activities and staff.

## **General coordination activities**

The general coordination activities include the following: the preparation of the single programming documents, reporting on past activities, coordination of the discharge process and reporting to the Discharge Authority, participation in the EU Agencies' Network, coordination of audits (by the European Court of Auditors, independent auditors and the European Commission Internal Audit Service) as well as the implementation of the Internal control framework, including risk management.

BEREC Office communications activities as part of the general coordination activities aim at increasing awareness of the Agency's work and mission in its host country Latvia, including through the new website and social media channels. In addition, it also includes the planning and execution of internal communications activities.

## **Legal services, procurement and data protection**

This activity involves the provision of a centralised procurement for BEREC and the BEREC Office, the provision of legal advice on matters related to the Staff Regulation and Conditions of Employment of Other Servants (CEOS), access to documents, the implementation of the BEREC Regulation, ethics and anti-fraud, and any other legal matters, including contract management and implementation, coordination of handling of court cases, investigations by OLAF, the Ombudsman or by the European Data Protection Supervisor, and the activities of the Data Protection Officer in ensuring compliance of BEREC and the BEREC Office with the applicable data protection rules.

## **Finance and accounting**

The finance and accounting activity includes the centralised provision of budget management, finance, accounting, and risk management in support to BEREC and the day-to-day Agency operations, a centralized management of missions and authorised travel, and asset registration.

## HR management

The HR tasks involve managing a wide range of recurring functions such as recruitment, staff rights, performance appraisals, promotion to the next higher grade, leave management, monitoring hybrid work arrangements, prolonged sick leaves, probationary periods, and disciplinary actions. HR also focuses on retaining and developing specialized staff, promoting career growth, improving staff conditions through collaboration with Latvian authorities, implementing a social welfare action plan, and ensuring efficient and timely recruitment.

## ICT, cybersecurity, security and document management

This task area encompasses ICT support for system maintenance, management of access rights, development of policies, procuring and managing the necessary services such as licenses, provision of hardware and business continuity services for the needs of the BEREC Office. In addition, an appropriate level of resources (human and financial) has to be allocated for the implementation of the requirements of the Cybersecurity Regulation and potentially also the upcoming Regulation on Information Security.

Facility management and logistics as part of this activity involves all of the Agency's actions related to overseeing its premises, including access to public utilities, maintenance of engineering systems, maintenance of furniture and organizing various logistic services like postal, courier and relocation services. This also covers provision of office supplies and other materials required for the Agency's daily functions.

The AWP contains detailed objectives, expected results and the description of each of the action to be financed, including an indication of the amount of financial and human resources allocated to each action. All activities listed above are developed on the basis of the availability of the following financial and human resources:

| Amount of EU contribution | Establishment plan posts | External personnel |
|---------------------------|--------------------------|--------------------|
| 8,748,550.00              | 17                       | 33                 |

The split of financial and HR resources between the different activities is presented in Annex II.

## III.2. Activities

### III.2.1 Activity (operational) - Support to BEREC Working Groups, Sustainability Experts Networking Group and phase II cases

#### *III.2.1.1 Overview of the Activity*

According to the BEREC Regulation, the BEREC Office assists in setting up BEREC Working Groups (WGs), following the request of the BoR, contributes to the regulatory work and provides them with professional and administrative support to ensure smooth functioning of those groups.

In accordance with Article 12 of the Rules of Procedure of the Management Board of the BEREC Office, the Management Board creates Expert Networking Groups (ENG). The ENG's should deliver expertise on specific matters requested by the BEREC Office in support to BEREC.

As sustainability is a key element of BEREC's strategy and annual work programme, there is a strong ambition to make the operations of BEREC and the BEREC Office more environmentally friendly. Therefore, the Sustainability ENG is tasked to assess the challenge and to identify the options, and to provide inputs to future annual work programmes and programming documents in this domain.

The BEREC Office also manages changes relating to the WGs, collects resource commitments from the national regulatory authorities (NRAs), sets up and manages the contact lists and email distribution lists related to the WGs. The BEREC Office provides support in data collections, and provides establishment and maintenance of necessary tools or databases for such exercises.

The BEREC Office provides administrative support to the WGs (including Sustainability ENG) in organising meetings and workshops - either physical or virtual and maintaining the information flow among members. In addition, the BEREC Office supports the organisation of the WGs' Co-Chairs meetings, usually organised twice a year or more, if required. Furthermore, it also provides logistics support to WGs and ENG, such as the reimbursement of experts' travel expenses to the NRAs. Depending on the deliverable, the BEREC Office provides professional support to WGs and ENG in preparation of BEREC documents, conducting public consultations and calls for input, and undertaking the role of drafters whenever required.

### *III.2.1.2 Objectives, indicators, results and outputs*

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**Objective: Provision of professional and administrative support services to BEREC WGs and Sustainability ENG for the fulfilment of the regulatory tasks**

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#### **Expected results:**

- Supporting the WGs work in accordance with the request of BEREC or of the WGs/ENG Co-Chairs;
- Contributing to drafting of BEREC deliverables including SUST ENG deliverables;
- Providing support, assistance and coordination in disseminating all kind of information and/or analysis of collected market data;

- Assisting in the timely submission of BEREC Opinions to the European Commission (EC);
- Regularly updating the records of market analysis notifications;
- Organising WGs/ENG meetings and workshops (hybrid and virtual), including WG Co-Chairs' meetings;
- Maintaining updated distribution and contact lists of WG/ENG drafters and members;
- Implementation of mid- and long-term sustainability objectives and KPIs to monitor the progress.

| Indicators  | Latest result<br>Year 2024                  | Target Year<br>2026                       | Means and<br>frequency of<br>verification |
|---|---|---|---|
| 1. Level of satisfaction of WG meeting organisation     | 98.3% of responses are in the top 2 scores  | ≥85% of responses are in the top 2 scores | Quarterly, CAAR                           |
| 2. Level of satisfaction of responses and communication | 100.0% of responses are in the top 2 scores | ≥85% of responses are in the top 2 scores | Quarterly, CAAR                           |
| 3. Level of satisfaction of provided support to WGs     | 96.9% of responses are in the top 2 scores  | ≥85% of responses are in the top 2 scores | Quarterly, CAAR                           |
| 4. Level of satisfaction of data collection exercises   | 96.2% of responses are in the top 2 scores  | ≥85% of responses are in the top 2 scores | Quarterly, CAAR                           |
| 5. Level of satisfaction of pre-draft documents         | 96.2% of responses are in the top 2 scores  | ≥85% of responses are in the top 2 scores | Quarterly, CAAR                           |

### Main outputs

- Active participation of BEREC Office members as drafters in the work of WGs/ENG upon request;
- Contribution to the drafting of the following regular draft reports:
  - Annual reports;

- International roaming benchmark report and the report on transparency and comparability of international roaming tariffs;
- The intra-EEA communications report;
- Report on the implementation of the Open Internet Regulation.
- Structured and timely provision of support for BEREC information and/or analysis on collected market data (upon request or in accordance with SPD);
- Data collection from NRAs and dissemination upon request from WGs or the BEREC Chair;
- Establishment and maintenance of necessary tools or databases for data collection exercises, management and analysis (like, based on the Roaming regulation or BEREC Regulation) in smart and efficient way;
- Conducting public consultations and calls for input to assist BEREC WGs;
- Coordination of the BEREC activities in accordance with the Article 32/33 of the EECC procedures;
- Establishment of Ad Hoc WGs Article 32/33 EECC cases and regularly updating the list of focal points, managing the notification database and coordinating the work on the BEREC Opinion and its timely submission and acting as experts/rapporteurs of the group if required;
- Support to hybrid WGs/SUST ENG meetings, workshops with internal and/or external experts, and audio-video conferences to ensure their proper functioning (including invitations to meetings, document circulation and reimbursement of related travel and accommodation expenses to persons invited to attend meetings in an expert capacity);
- Full logistic and technical support to the organisation of WGs' public workshops – selection and rental of venues, ICT services, AVC and other technical equipment and tools (like microphones, recordings, remote access provision, translation / interpretation services etc.), catering services;
- Monitoring and reporting of sustainability KPIs;

### *III.2.1.3 Resources*

| <b>Financial resources (EUR)</b> | <b>FTEs</b> |
|----------------------------------|-------------|
| 2,201,574.30                     | 18.85       |

### III.2.1.4 Estimates of quantifiable workload drivers

| Workload driver  | Latest result 2024 | Estimate 2026              |
|--|--------------------|----------------------------|
| 1. Provision of virtual WG meetings  | 331                | ≤500                       |
| 2. Provision of support to hybrid WG meetings  | 24                 | ≤30 <sup>31</sup>          |
| 3. Provision of support to workshops with external experts (hybrid & virtual)  | 5                  | ≤9                         |
| 4. Provision of support to participation in 3rd party meetings (hybrid & virtual)  | 8                  | ≤5                         |
| 5. Provision of ad hoc meetings under Article 32/33 procedures (hybrid & virtual)  | 15                 | ≤15                        |
| 6. Carbon footprint of WG meetings   | 53 t               | ≤ 53 t                     |
| 7. Provision of virtual WG meetings (Sustainability ENG)   | 4                  | ≤ 10                       |
| 8. Provision of support of hybrid WG meetings (Sustainability ENG)   | 0                  | ≤ 2                        |
| 9. Reimbursement of the expenses of participants in the BEREC WG meetings and events listed above in compliance with the applicable BEREC Office rules and within the deadlines envisaged in the BEREC Office Financial Regulation | 238                | <300 <sup>32</sup> experts |

## III.2.2 Activity (operational) - High level meetings and support to the Boards

### III.2.2.1 Overview of the Activity

According to the BEREC Regulation, BEREC should assist and advise the national regulatory authorities (NRAs) and the European Commission (EC) in the execution of their responsibilities under the Union regulatory framework through the pooling of expertise from NRAs without duplicating work already undertaken. BEREC, as a technical body with expertise on electronic communications and composed of representatives from NRAs and the EC, should contribute to

<sup>31</sup> Estimated based on the experience in two previous years.

<sup>32</sup> This number includes meetings and events supported by the Agency for the BEREC WG meetings and workshops organised through the AGM tool.

a consistent implementation of the regulatory framework for electronic communications. BEREC should also serve as a body for reflection, debate and advice for the European Parliament (EP), the Council and the EC in the electronic communications field.

These objectives, among others, are achieved through the adoption of a number of BEREC deliverables, which are approved either during the meetings or by electronic voting procedures. Thereby, decisions on regulatory topics are made by the BoR, whereas the BEREC Office Management Board (MB) decides on administrative matters such as the budget, staff and audits, among others.

Additionally, in order to enhance the cooperation between NRAs, the EC, the EP, the Council and interested parties (stakeholders), BEREC organises different events and participates in events organised by third parties during which the Chair or the Vice-Chair present BEREC views and share BEREC expertise.

Therefore, the BEREC Office provides professional and administrative support services to the BoR, the MB, and respectively their Chair and Chairperson and Vice-Chairs and Deputy Chairpersons, CN and BAG in fulfilling their assignments.

In order to increase efficiency and flexibility for BEREC meetings and to provide standardised technical solution for remote participation, BEREC Office provides comprehensive videoconference services to allow for organisation of numerous remote or hybrid high-level events.

#### *III.2.2.2 Objectives, indicators, results and outputs*

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**Objective: To provide efficient professional and administrative supporting services to the Chair and Vice-Chairs of the BoR, Chairperson and Deputy Chairpersons of the MB of the BEREC Office, Mini Board, the BoR and MB, CN and BAG in execution of their tasks and responsibilities, including cooperation and liaison with the EC, the EP, the Council, other Union bodies, offices, agencies, advisory groups, regulatory authorities of third countries, international organisations, and other stakeholders**

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#### **Expected results:**

- Support in the organisation of the high-level BEREC events, such as BoR, MB, Mini Board, and CN meetings, and high-level workshops, including via videoconferencing systems or in hybrid format;
- Support in the organisation of BoR and MB electronic voting procedures;



- Maintaining updated public lists of BoR, MB Members, Participants without voting rights and their Alternates, including their Declaration of Interest and Commitments and CVs;
- Maintaining updated lists of CN Members and BAG Members and their Alternates;
- Support in the organisation of the high-level BEREC and BEREC Office events, such as high-level workshops, meetings with the EU institutions and other similar events also via videoconferencing systems or in hybrid format;
- Support in the establishment and implementation of working arrangements and liaison with the EC, EP, the Council, other Union bodies, offices, agencies, advisory groups, regulatory authorities of third countries, international organisations, and other stakeholders, if needed.

| Indicators  | Latest result<br>Year 2024                         | Target Year<br>2026                       | Means and frequency<br>of verification |
|---|--|---|--|
| 1. Level of satisfaction with high-level meetings (measure the level of satisfaction of CN and BAG members, WG Co-Chairs and the BoR on a 5-grade scale on the basis of multiple questions) | 95% (H1 2024) of responses are in the top 2 scores | ≥90% of responses are in the top 2 scores | CAAR                                   |
| 2. Carbon footprint of high-level meetings in tons  | 157.77   | <170                                      | CAAR                                   |

### Main outputs

- Support in the organisation of 4 CN meetings;
- Support in the organisation of 4 ordinary BoR and MB plenary meetings;
- Organisation of 4 BAG video conferences and other consultations depending on needs;
- Support in the organisation of up to 30 Mini Board meetings;
- Management of documents related to the above-mentioned activities and follow-up activities;
- High-quality support to the organisation of up to 25 electronic voting procedures;
- Preparation of regular overviews of the outcome of electronic voting procedures as well as information on electronic voting procedures planned in the period to the next plenary meeting (for each CN and plenary meetings);
- Regular updates to internal BoR, MB, Mini Board, CN and BAG contact lists and publishing the updated BoR and MB Members and Alternates lists;

- Collection and publication of the Declarations of Interests and Commitments and CVs of the BoR and MB Members, Participants without voting rights and their Alternates on the BEREC website;
- Support in the organisation of up to 2 BEREC high-level workshops (public or internal) organised back-to-back with the BoR ordinary meetings;
- Support in the organisation of up to 2 BEREC meetings with the EU institutions (excluding meetings only with the BEREC Chair/Vice-Chairs, which are included in the Chair's events);
- Support in the organisation of approx. 45 meetings of the BEREC Chair and Vice-Chairs and Chairperson and Deputy Chairpersons of the Management Board of the BEREC Office and events attended by them or their representatives, such as: conferences, events organised by other EU bodies and/or EU institutions, bilateral meetings with interested parties, etc.;
- Support in the organisation of up to 10 BEREC international events (organised by BEREC or other stakeholders), including the Mini Board study trip;
- Management of documents related to the above-mentioned activities;
- Maintaining updated lists of key contact points and liaising with the EC, EP, the Council, other Union bodies, offices, agencies, advisory groups, regulatory authorities of third countries, international organisations, and other stakeholders with whom BEREC and BEREC Office cooperates;
- Maintaining an updated Register of International and Inter-institutional Cooperation Agreements signed by BEREC and BEREC Office with external entities;
- Calculation of financial contributions from the third country NRAs participating in the work of BEREC and BEREC Office.

### *III.2.2.3 Resources*

| <b>Financial resources (EUR)</b> | <b>FTEs</b> |
|----------------------------------|-------------|
| 867,627.95                       | 3.08        |

### *III.2.2.4 Estimates of quantifiable workload drivers*

| <b>Workload driver</b>                          | <b>Latest result 2024</b> | <b>Estimate 2026</b> |
|---|---------------------------|----------------------|
| Number of high-level meetings with reopening of | 4                         | 7                    |

|  |     |     |
|--|-----|-----|
| competition <sup>33</sup>  |     |     |
| Number of high-level meetings without reopening of competition <sup>34</sup> | 24  | 30  |
| Number of reimbursements   | 269 | 300 |
| Number of electronic voting procedures                                       | 25  | 25  |

### III.2.3 Activity (operational) - ICT support to BEREC

#### III.2.3.1 Overview of the Activity

The BEREC Office is committed to providing a high-quality support to BEREC in regards to ICT systems, ICT services and video conferencing services ensuring the availability of different software solutions, professional equipment, unified communication services needed for BEREC's information systems and Audio-Visual meetings either physical, hybrid or digitally organized events.

The Agency is committed to maintain an efficient and effective governance and service model to achieve and provide high-level operational ICT delivery to BEREC. During the course of 2026-2028, the Agency will focus on the usage of secure and reliable ICT infrastructure including the hosting of ICT systems and corporate home page. The BEREC Office will continue to provide the needed ICT support services to BEREC at the highest security standards.

The Agency will continue to maintain and support the AVC facility in Brussels for the needs of the BEREC Working groups. Additionally, the Agency will provide support for the organization of AVC service including streaming service in hybrid meetings and events necessary for the successful organization of virtual meetings for which ICT resources need to be allocated.

#### III.2.3.a Sub-activity - IT Support, Licenses, Hardware and Business Continuity for BEREC

##### III.2.3.a.1 Overview of the sub-activity

In order to provide the necessary technical functionality of the existing operational IT systems and platforms, certain number of software licenses and IT services must be purchased on a yearly basis. In addition, the provision of ICT services, such as necessary hardware, software, services like IaaS, SaaS and PaaS, connectivity, ICT consultancy have to be ensured on a yearly basis.

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<sup>33</sup> Organisation of meetings with launching procurement procedure - a competition among the parties to an existing framework contract.

<sup>34</sup> Organisation of meetings without launching any procurement procedure.

In order to comply with the corporate Business Continuity (BC) strategy, it is necessary to ensure back-up and disaster recovery processes for business-critical operational data and ICT systems.

The Expert Networking Group of ICT experts continues to operate to support BEREC (see point 2.3), collaborating and delivering capacity to meet BEREC ICT needs.

The BERECNet+ platform is the common platform for the exchange of information between BEREC, the Commission and National Regulatory Authorities (NRAs) according to Article 41 of the BEREC Regulation. In 2023, the 2-factor-authentication was introduced to protect the platform and prevent unauthorized users from accessing it. Relevant external services linked to the maintenance, availability and operability of the information and communication system are envisaged to be procured via existing FWCs ensuring the necessary support to the BEREC users and availability of the entire system.

The BEREC Office will maintain the following EU databases, according to the EECC and the roaming regulation:

- GADB - EU database of the notifications transmitted to the competent authorities (Article 12(4));
- a central registry database on the numbering resources with a right of extraterritorial use within the Union;
- VAS - a single, Union-wide database of numbering ranges for value-added services in each Member State, to be made accessible to operators, national regulatory authorities and, where applicable, to other competent authorities;
- Emergency database - a single, Union-wide database of means of access to emergency services that are mandated in each Member State and that are technically feasible to be used by roaming customers, to be made accessible to operators and national regulatory authorities and, where applicable, to other competent authorities.

The BEREC Office will continue to maintain and support corporate information systems used by BEREC, included those listed above. Given the current threat landscape, it will be necessary to ensure that cybersecurity is maintained at an appropriate level which requires the necessary financial resources.

### *III.2.3.a.2 Objectives, indicators, results and outputs*

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**Objective: Enable operations by maintaining high availability of secure IT services (dedicated applications, databases, web sites) in regard to IT infrastructure and services (cloud and on prem.), provision of necessary licenses and IT support**

### and provision of expertise on ICT matters in support to BEREC (knowledge exchange)

#### Expected results:

- Continuous provision of software licenses and IT support services for operational needs;
- Cost effective use of on-premise and cloud ICT infrastructure and respective services;
- Maintained and secured IT infrastructures and applications, hosted as per SLA requirements;
- Ensure a sustainable back-up system for the BEREC data as well as functional disaster recovery service;
- Existing solutions maintained;
- Continuous support for the NRA's ICT network.

| Indicators  | Latest result<br>Year 2024 | Target Year<br>2026 | Means and frequency of<br>verification |
|---|----------------------------|---------------------|--|
| 1. Ratio of tickets that require more than 1.5 days resolution time   | 1.99%                      | <10%                | Reports from ticketing system          |
| 2. System Availability:<br>2.1 BERECNet+<br>2.2. GADB<br>2.3. BEREC Website<br>2.4. VAS and Emergency Databases | 99.9%                      | > 99.8 %            | Reports from monitoring tools          |

#### Main outputs

- Signed contracts for software licensing (no interruption of IT services related to software licensing), ensuring the continuous availability of licenses (BERECNet+, Microsoft, Cisco, Webex, Security related products and other licenses);
- Continuous availability of necessary software products for IT support to BEREC;
- Continuous availability of IT support in regard to ICT system for the exchange of information - user management and WG sections;
- Continuous availability of licenses for video conferencing needs;
- Continuous availability of IT support and managed services for video conferencing;

- Continuous availability of IT support for management of email distribution groups and managed security services for email communication system;
- Continuous availability of IT support for provision of necessary security administration of corporate website;
- Continuous availability of IT support for the management of cloud infrastructure linked to back up as a service and disaster recovery as a service of business-critical operational data and ICT systems;
- Continuous availability of licenses for backup solution;
- Continuous availability of onsite IT support for the development and maintenance of ICT projects such as databases and ICT systems linked to BEREC activities;
- Continuous availability and operability of ICT systems for operational needs;
- Reduced time and increased efficiency for provided IT support to BEREC activities;
- Continuous availability of business-critical operational data and IT systems;
- Usage of cloud services in order to ensure business continuity linked to Back up as a service (BaaS), Disaster recovery as a service (DRaaS) and Infrastructure as a service (IaaS); Provision of systems operational from cloud environment;
- Reduced RTO and RPO as defined in the corporate BCM programme;
- Ensure availability of Video-conferencing licences and services as well as equipped meeting rooms in Brussels and Riga sites for these reasons;
- Maintenance of BEREC Website and its data assets;
- Availability of mobile AVC equipment;
- Maintained BERECNet+ platform; Availability and usage of managed services BERECNet+;
- Maintained data set tool for benchmarking exercise;
- Maintained GADB (notifications under general authorisation);
- Maintained Database (numbering);
- Promote shared ICT knowledge and experience sharing in order to exchange good ICT practices;
- Inter-NRA cooperation on issues of common interest in the area of Information and Communication Technologies;
- Sustain an Expert Networking Group of ICT professionals across NRAs in order to benefit from synergies and shared experience;
- Foster collaboration on common ICT technologies in use among BEREC Office and NRAs;

- Maintained VAS and Emergency databases;
- Ensure security plans and controls are in place allowing compliance with cybersecurity regulation and for preventing cyberattacks.

### **III.2.3.b Sub-activity - IT Projects for BEREC**

#### *III.2.3.b.1 Overview of the sub-activity*

The provision of high-availability communication services including reliable and modern AVC equipment in meetings rooms have to be ensured during the course of 2026-2028 to both BEREC and BEREC Office in the premises in Riga and Brussels. This will be achieved by ensuring the necessary maintenance and technical improvements of the AVC systems including the resources to be allocated for hardware, licences, managed services and technical support works. This will serve as enabler for a higher level of efficiency, cooperation and objective outcomes in digital meetings.

The ICT ENG will provide expertise in the ICT domain in support to BEREC and BEREC Office with the aim to explore possibilities and foster collaboration across the NRAs within the ICT domain. The ICT ENG will focus on identifying policies and operational procedures, which can be used for better ICT governance. Additionally, when needed, the involvement of the ENG is envisaged to play a key role in existing and new system testing, suggesting improvements, and definition of systems requirements, etc.

In 2024, the BEREC Office has developed the ICT strategy 2024 – 2027, together with BEREC members and the ICT ENG. The implementation of the ICT strategy will continue during 2026-2028, which will require the allocation of necessary resources for planned activities, such as cybersecurity and others.

The necessary maintenance, security and support services, which are needed for the corporate website, have to be ensured during 2026. The system will be operated with a new services model following a required migration activity in 2025 due to SLA changes between BEREC Office and an EU Agency, which was hosting and maintaining the system between 2020 and 2024.

#### *III.2.3.b.2 Objectives, indicators, results and outputs*

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**Objective 1: Development and maintenance of secure ICT systems according to the BEREC regulation and maintenance and availability of the existing products for ensuring their reliability, their need to meet evolving business needs and the need to be kept interoperable with other systems overtime**

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**Expected results:**

- Systems developed and maintained according to the BEREC Regulation;
- Systems and services piloted and implemented (on premises and cloud);
- AVC systems delivered and maintained;
- AVC system meeting sustainability requirements;
- Ensured AVC interoperability between sites.
- Implementation of newly developed ICT strategy.

| <b>Indicators</b>   | <b>Latest result<br/>Year 2024</b> | <b>Target Year<br/>2026</b> | <b>Means and frequency<br/>of verification</b>       |
|---|------------------------------------|-----------------------------|--|
| 1. Support man days of external service provider                                    | 491                                | 765                         | Monthly, CAAR  |
| 2. Assessment of further improvements of AVC system, implementation of improvements | N/A                                | Implementation by Q4        | Implementation of identified AVC system improvements |
| 3. AVC Collaboration Platform availability during on-site meetings                  | N/A                                | >99%                        | Reports from monitoring tools, CAAR                  |

**Main outputs**

- Development of reliable IT solutions with appropriate cybersecurity levels meeting business needs;
- Developed and maintained new core-business and administrative solutions;
- Implementation and usage of modern and secure cloud services and solutions;
- Developed and maintained other ICT tools for the needs of BEREC;
- Operational AVC systems delivered and maintained for WG meetings;
- Ensure availability of video-conferencing hardware, licences, maintenance services and connectivity services for AVC meeting rooms;
- Further improvements of AVC system assessed and implemented;
- Ensure interoperability between AVC systems;
- Ensure availability of portable AVC equipment (based on budget availability);
- Implementation of ICT strategy.



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**Objective 2: Provision of expertise in the ICT domain in support to BEREC**


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**Expected results:**

- Sharing experience and benefiting from synergies, e. g., optimisation of security settings for on-premises and cloud environments; surveys on important topics;
- Fostering collaboration on common ICT problems, e.g. impacting smooth communication services provided by ICT tools, implementation and usage of secure email;
- Support of the coordination of common ICT initiatives among NRAs, e.g., usage of video-conferencing solutions, better IT Governance and IT Security; usage of two-factor authentication.

| Indicators   | Latest result<br>Year 2024 | Target Year<br>2026 | Means and frequency of<br>verification |
|--|----------------------------|---------------------|--|
| 1. Ratio of virtual ICT ENG meetings<br>(virtual / all meetings) | N/A                        | >80%                | CAAR                                   |

**Main outputs**

- Bi-annual meetings organised with ICT colleagues from across NRAs. Establishment of contact details for communication concerning ICT emergency response – for issues and immediate collaboration linked to security and urgent issues;
- Pilot version of common collaboration space (section on BERECNet+) for sharing ideas, procedures, policies, guidelines, comments, etc. – for fostering the ICT collaboration across NRAs; Exploring further optimization of BERECNet+;
- Identification and comparison of standard operation procedures in the ICT domain;
- Provision of support to the proper functioning of ENGs and audio-video conferences and ENG meetings (such as invitations to meetings, document circulation and reimbursement of related travel and accommodation expenses to persons invited to attend meetings in expert capacity).

*III.2.3.2 Resources*

The total resources required for the whole III.2.3 Activity (operational) - ICT support to BEREC – are as follows:

| Financial resources (EUR) | FTEs |
|---------------------------|------|
|---------------------------|------|

|            |      |
|------------|------|
| 986,894.89 | 3.87 |
|------------|------|

### *III.2.3.3 Estimates of quantifiable workload drivers*

The total estimates of quantifiable workload drivers for the whole III.2.3 Activity (operational) - ICT support to BEREC – are as follows:

| Workload driver                        | Latest result 2024 | Estimate 2026 |
|--|--------------------|---------------|
| Number of small projects (< = 150.000) | 5                  | 3             |
| Number of big projects (> 150.000)     | 0                  | 0             |

## **III.2.4 Activity (operational) - Information gathering and distribution**

### **III.2.4.a Sub-activity - Regulatory information and training for BEREC**

#### *III.2.4.a.1 Overview of the sub-activity*

In order to provide professional support to BEREC according to the objectives of the WP, the BEREC Office plans to acquire a subscription to the regulatory intelligence services related to telecommunications and digital economy, if resources would allow so. In view of the development in the telecommunications sector, the BEREC Office requires the highest level of accuracy and relevance of real-time data and information available within the sector. Therefore, relevant updates on major EU level developments related to telecommunications regulation, key regulatory initiatives, market analysis, and other important topics related to BEREC activity areas are necessary, in particular in view of the EECC to be able to provide the high level of support to the WG work.

The BEREC Office will continue organising necessary trainings to BEREC experts also in 2026. Depending on the availability of financial resources, the Agency will organise a course on the topics related to the regulatory framework for electronic communications and other topics related to BEREC activities provided by the external contractor. If the resources are not available or limited, the Agency will organise internal workshops and informative training sessions by using internal BEREC resources and expertise of BEREC experts. The training programme will cover latest developments of the legal framework and trends within the digital sector and will also be extended to the topics of sustainability and its relevance to the area of BEREC activities. In addition, trainings on communication, moderation and planning of work of the Co-Chairs of the Working Groups and Expert Networking Groups might also be provided to assist the Co-Chairs in their daily tasks to fulfil the WP objectives, as required.

### III.2.4.a.2 Objectives, indicators, results and outputs

**Objective:** Provision of information and knowledge dissemination

**Expected results:**

- Regular update on regulatory and financial intelligence services related to BEREC work;
- Provision of regular training to update and enhance the professional knowledge of BEREC experts in the areas of BEREC activities.

| Indicators   | Latest result<br>Year 2024               | Target Year<br>2026                       | Means and frequency<br>of verification |
|--|--|---|--|
| 1. Satisfaction in organisation of trainings             | 97% of responses are in the top 2 scores | ≥85% of responses are in the top 2 scores | Quarterly, CAAR                        |
| 2. Satisfaction on the content/delivery of the trainings | 91% of responses are in the top 2 scores | ≥85% of responses are in the top 2 scores | Quarterly, CAAR                        |

**Main outputs**

- Subscription of regulatory intelligence services related to telecommunications and digital economy provided for keeping the WGs updated on the regulatory information;
- Organisation of procurement procedures both for the provision of content of the trainings as well as for the organisational and logistical aspects if the training is organised onsite;
- Training delivered on an annual basis to NRA experts.

### III.2.4.a.3 Estimates of quantifiable workload drivers

| Workload driver                     | Latest result 2024 | Estimate 2026 |
|-------------------------------------|--------------------|---------------|
| Number of physical training courses | 0                  | ≤0            |

|   |                 |     |
|---|-----------------|-----|
| Number of virtual training courses                | 1 <sup>35</sup> | ≤ 2 |
| Number of reimbursements of training participants | 0               | 0   |
| Number of data collection exercises               | 21              | ≤20 |
| Number of draft documents                         | 35              | ≥35 |

### III.2.4.b Sub-activity - Studies and other projects for BEREC

#### III.2.4.b.1 Overview of the sub-activity

To support the implementation of the BEREC WP, the BEREC Office shall deliver studies and research reports or any other material, upon request from the WGs or from BEREC, including by launching and managing the necessary procurement procedures (where applicable) and/or contracts. Furthermore, the BEREC Office supports already initiated projects defined in the SPD of the previous year.

In 2026, the BEREC Office will continue to provide support in procuring studies defined in the BEREC Work Programme of the year.

The BEREC Office continues providing an online EU Survey platform for conducting public consultations and calls for inputs from stakeholders during preparation of the draft BEREC documents. The platform ensures transparency and allows an active involvement of stakeholders in the work of BEREC.

The Agency also ensures maintenance of the Information Sharing Portal (IS Portal), which is designed to complement the information available on NRAs websites. It provides a one-stop access point to public documents in the field of electronic communications and ensures public access to a comprehensive, regularly updated list of documents. The portal includes several sections and covers all categories of documents issued by NRAs for public use. The general IS Portal is planned to be complemented by a specific collection of links to NRAs open data portals.

The BEREC Office continues cooperation under a SLA with the European Commission Translation Centre for the provision of translation and editing services. In order to ensure good quality of BEREC public documents, the Agency will continue using the services of the EC Translation Centre, so the final document is easy to read.

The BEREC Office is required by BEREC to collect, exchange and transmit information between NRAs regarding regulatory tasks assigned to BEREC. The BEREC Office is also mandated to

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<sup>35</sup> Training course on regulatory framework and telecommunications sector developments.

contribute to draft reports on specific aspects of the communications market, and to acquire appropriate databases, financial software and necessary historical data sets (among those for calculating certain parameters underlying the weighted average cost of capital) necessary for BEREC work, in particular that relates to the work of the BEREC Working Groups.

### *III.2.4.b.2 Objectives, indicators, results and outputs*

#### **Objective 1: Ensure visibility and further improved quality of BEREC deliverables**

##### **Expected results:**

- Study according to the BEREC WP is procured and delivered;
- BEREC input provided through the IS Portal;
- Language service for BEREC documents is provided;
- Acquisition and provision of financial software and necessary historical data sets for the calculation of certain parameters underlying the weighted average cost of capital (WACC);
- Necessary tools and subscriptions are provided to the WGs.

| <b>Indicators</b>                     | <b>Latest result<br/>Year 2024</b>         | <b>Target Year<br/>2026</b>               | <b>Means and frequency<br/>of verification</b> |
|---------------------------------------|--|---|--|
| 1. Satisfaction on studies & projects | 94.4% of responses are in the top 2 scores | ≥85% of responses are in the top 2 scores | CAAR   |

##### **Main outputs**

- Purchase (procurement) of the study/project;
- Coordination and monitoring during elaboration phase of the study/project;
- Supervision of final delivery of the studies/project;
- Maintenance of IS Portal;
- Language services of relevant BEREC documents;
- Acquisition and provision of financial software and historical data sets for the calculation of certain parameters underlying the weighted average cost of capital (WACC) and other financial parameters.

### III.2.4.b.3 Estimates of quantifiable workload drivers

| Workload driver   | Latest result 2024 | Estimate 2026 |
|---|--------------------|---------------|
| Number of documents sent for language service                                 | 3                  | ≥5            |
| Number of studies/projects without procurement procedure (using existing FWC) | 6                  | >5            |
| Number of studies/projects with procurement procedure (no existing FWC)       | 2 <sup>36</sup>    | 1             |

## Objective 2: Facilitating the reimbursement process

### Expected results:

- Reimbursement process is organised through the *Advanced Gateway to your Meetings* (AGM) application tool

| Indicators   | Latest result Year 2024 | Target Year 2026 | Means and frequency of verification |
|--|-------------------------|------------------|-------------------------------------|
| 1. Reimbursement of the expenses of participants in the BEREC meetings and events in compliance with the applicable BEREC Office rules and within the deadlines envisaged in the BEREC Office Financial Regulation | 507 <sup>37</sup>       | >500 experts     | CAAR                                |

### Main outputs

- Organisation of meetings;
- Online registration of participants for the meetings;
- Reimbursement through the AGM tool of travel, subsistence and other expenses incurred

<sup>36</sup> As defined in the BEREC Work Programme of the relevant year.

<sup>37</sup> This is a total number of reimbursements to NRA experts processed through the AGM tool for all BEREC meetings (PMU and OSU together).

in the course of journey made by experts invited to the BEREC WG and other BEREC and BEREC Office meetings, workshops and events;

- Provisions of training and support to BEREC experts regarding the tool.

#### *III.2.4.b.4 Estimates of quantifiable workload drivers*

| <b>Workload driver</b>                            | <b>Latest result 2024</b> | <b>Estimate 2026</b> |
|---|---------------------------|----------------------|
| Number of hybrid training courses                 | 0                         | ≥1                   |
| Number of virtual training courses                | 1                         | >1                   |
| Number of reimbursements of training participants | 0                         | 0                    |

#### *III.2.4.1 Resources*

The total resources required for III.2.4 Activity (operational) - Information gathering and distribution are as follows:

| <b>Financial resources (EUR)</b> | <b>FTEs</b> |
|----------------------------------|-------------|
| 29,823.97                        | 0.23        |

### **III.2.5 Activity (operational) - BEREC communications activities**

#### *III.2.5.1 Overview of the activity*

BEREC communications activities are focused on ensuring maximum internal and external transparency and accountability of BEREC activities, strengthening its digital presence and engagement with stakeholders and include implementation of the BEREC External Communications Strategy and annual communications plans. They are relying on successful management of the digital communications tools and activities: the new, expanded BEREC website and social media accounts, management of media and stakeholders' relations, and organisation of public events. It also covers the mandate and tasks of the BEREC Communications Expert Networking Group.

The Communications ENG drafts and implements the annual BEREC Communications Plan after approval by the Boards that stems from the BEREC External Communications Strategy in collaboration with the BEREC Office and the incoming BEREC Chair's team. The ENG also promotes BEREC in the individual Member States, by encouraging knowledge exchange between

the communications staff of all the BEREC members, who can act as multipliers of the communications messages. In 2026, the BEREC Office will continue to facilitate the work of the ENG by organizing its meetings and workshops, as well as by providing drafting support to the strategic documents and in production of communications content and campaigns.

The BEREC Office ensures the day-to-day BEREC communications activities as well as the relations with media and stakeholders and compliance with the multilingualism provisions of the Agency. In 2026, the BEREC Office will place a strong emphasis on strengthening BEREC's digital presence by actively leveraging social media in line with its comprehensive Social Media Strategy developed in 2025. Working closely with content partners, the BEREC Office will organize and lead key public events, including public debriefings, Stakeholder Forums, and various joint initiatives, ensuring dynamic engagement across social media platforms to broaden its reach and impact.

### *III.2.5.2 Objectives, indicators, results and outputs*

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#### **Objective 1: Provision of expertise on communications matters in support to BEREC**

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##### **Expected results:**

- New BEREC External Communications Strategy based on the BEREC Strategy 2026-2030;
- Implementation of the BEREC External Communications Strategy and its annual plan;
- Execution of planned communications projects and campaigns;
- Promotion of BEREC in the individual Member States, mainly by encouraging knowledge exchange between the communications staff of all the BEREC members, who can also act as multipliers of the message;
- Drafting of the BEREC Communications plan 2027 and BEREC Message House 2027.

| <b>Indicators</b>   | <b>Latest result<br/>Year 2024</b> | <b>Target Year<br/>2026</b> | <b>Means and frequency<br/>of verification</b> |
|---|------------------------------------|-----------------------------|--|
| 1. Number of NRAs represented in the Comms ENG                  | 17                                 | 20                          | CAAR   |
| 2. Ratio of virtual Comms ENG meetings (virtual / all meetings) | 66%                                | >80%                        | CAAR   |



### Main outputs

- Outputs identified under the Objective 2, section 2.5. *BEREC Communications* of this document;
- Contribution to the drafting of the BEREC External Communications Strategy and annual Communications Plan 2027;
- Document to be delivered for the adoption: BEREC External Communications Strategy, BEREC Communications Plan 2027 and BEREC Message House 2027;
- Organisation of up to 2 hybrid and up to 6 virtual ENG meetings;
- Organisation of regular video-conferences with the ENG Co-Chairs;
- Organisation of up to 4 workshops in support to drafting of the BEREC External Communications Strategy and Communications Plan;
- Organisation of up to 1 training session on topics related to the working items of BEREC and up to 2 training sessions on topics related to the communications area (optional, upon request);
- Organisation of physical/virtual meetings with the BEREC Working Group Co-Chairs for inputs to dedicated communications campaigns and/or update of the BEREC website's content;
- Dissemination of information on BEREC tasks, activities and results of its work through the BEREC Communications ENG.

#### *III.2.5.3 Estimates of quantifiable workload drivers*

| Workload driver                | Latest result 2024 | Estimate 2026 |
|--------------------------------|--------------------|---------------|
| Number of hybrid ENG meetings  | 2                  | up to 2       |
| Number of virtual ENG meetings | 4                  | up to 6       |

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**Objective 2: To provide efficient professional and administrative support to BEREC in the implementation of the BEREC External Communications Strategy and the BEREC Communications Plan 2024**

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#### **Expected results:**

- Tasks in support of BEREC Communications ENG work:

- Support to the development of BEREC communications projects and communications campaigns and creation of communications outputs on specific topics identified in the BEREC Communications Plan 2026.
- Tasks executed by the BEREC Office Communications team:
  - Producing and publishing day-to-day communications items (news, newsletters, press releases, social media posts and visuals) reflecting the BEREC Chair's external activities, BEREC events and the BEREC work and its results;
  - Regular updates of information on the website (within the "ownership" of the Communications team);
  - Regular update and dissemination of information on the BEREC social media accounts;
  - Maintaining and updating the lists of website subscribers, stakeholders and media representatives;
  - Interaction with stakeholder and media representatives upon request and according to the projects foreseen in the annual communications plan;
  - Assistance in production of design version, publication and distribution of BEREC Annual reports and Work Programme;
  - Production, publication and distribution of infographics, brochures, banners, posters and other type of information materials, branded items and audio-visual content;
  - Organization of physical, hybrid and/or virtual public debriefings and high-level stakeholder events, including BEREC Stakeholder Forums, joint and/or press events;
  - BEREC Visual Identity guidelines are up-to-date and used when communicating on BEREC, its tasks and the result of its work; ;
  - Provision of multilingualism for the website
  - Aiming at making the BEREC website fully compliant with WCAG 2.1 Level AA accessibility.

| Indicators   | Latest result<br>Year 2024 | Target Year<br>2026 | Means and frequency<br>of verification |
|--|----------------------------|---------------------|--|
| 1. Social media followers on the official social media channels (X, LinkedIn, YouTube) | 12 804                     | 13 770              | CAAR                                   |
| 2. Livestream connections to BEREC public events                                       | 1695                       | 1700                | CAAR                                   |

### Main outputs

- Related to the BEREC Communications ENG mandate:
  - Online, printed, audio-visual and other communications items produced according to the specific projects in the annual BEREC Communications Plan;
- Outputs by the BEREC Office Communications team:
  - Regular digital communications activities, including production and publication of audio-visual materials, social media posts ensured, upon request;
  - News items and press releases produced and published on the BEREC website monthly;
  - Press releases sent out to the media subscribers list, when produced;
  - Newsletters drafted and distributed to the website subscribers, stakeholders and media representatives monthly;
  - Regularly maintained lists of website subscribers, stakeholders and media representatives;
  - Responses provided to the stakeholders and media, upon request;
  - Production of the design version and publication/distribution of BEREC Annual reports and BEREC Work Programme;
  - Up to five livestream recordings are produced and published;
  - Four BEREC public debriefings, Stakeholder Forum and/or one joint event is organized;
  - Various subscriptions to the digital communications and monitoring tools ensured;
  - The BEREC website's static and dynamic content (within the "ownership" of the Communications team) created or updated;
  - Technological solution(s) and update of the BEREC website content translations in all EU languages is ensured according to the approved policy.

#### III.2.5.4 Estimates of quantifiable workload drivers

| Workload driver  | Latest result 2024 | Estimate 2026 |
|--|--------------------|---------------|
| Number of small events (< = 100 physical participants) | 4                  | up to 4       |

|  |     |         |
|--|-----|---------|
| Number of big events (>100 physical participants)                              | 1   | up to 2 |
| Number of news items and press releases  | 36  | 36      |
| Number of newsletters  | 31  | 31      |
| Number of social media posts and uploads on the official social media channels | 360 | 360     |

### *III.2.5.5 Resources*

The total resources required for the III.2.5 Activity (operational) - BEREC Communications activities are as follows:

| <b>Financial resources (EUR)</b> | <b>FTEs</b> |
|----------------------------------|-------------|
| 495,197.24                       | 2.43        |

## **III.2.6 Activity (horizontal) - General coordination activities**

### **III.2.6.a Sub-activity - General coordination**

#### *III.2.6.a.1 Overview of the sub-activity*

The general coordination includes the following recurring activities:

- preparation of the Single Programming Documents (SPDs);
- reporting on the past activities (Consolidated interim (H1) and annual activity reports); coordination of discharge process and report to the Discharge Authority;
- coordination of the BEREC Office participation in the EU Agencies' Network (EUAN); coordination of the audits (by the European Court of Auditors (ECA), including independent auditors and the European Commission Internal Audit Service (IAS);
- implementation of the internal control framework, including risk management;
- coordination of the relations with the authorities of the Host Member State.

#### *III.2.6.a.2 Objectives, indicators, results and outputs*

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**Objective: Delivery of BEREC Office planning and reporting documents within the set deadlines and smooth running of activities linked to audit management, budgetary discharge, internal controls and risk management**

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**Expected results:**

- Timely preparation of the following documents, including:
  - Single Programming Documents (SPDs);
  - Consolidated Annual Activity Reports (CAARs);
  - Other horizontal documents requested;
- Timely transmission of information to the Discharge Authority, ECA, the IAS and the independent auditors;
- Implementation of the internal control framework and risk management at appropriate level;
- Smooth operation of the Agency via the implementation of the Headquarters' Agreement/Service level agreement with the Government of Latvia.

| Indicators  | Latest result<br>Year 2024 | Target Year<br>2026   | Means and frequency<br>of verification           |
|---|----------------------------|---|--|
| 1. Compliance with legal deadlines or deadlines for submission of documents to MB | 100%                       | 100% of the documents are delivered within the respective deadlines | CAAR, management meetings (if and when relevant) |
| 2. Number of IAS audit recommendations  | N/A <sup>38</sup>          | ≤3  | CAAR   |

**Main outputs**

- Annual Activity Reports;
- BEREC Office SPDs;
- Other documents for the MB ordinary meetings or BAG meetings, not following in the scope of any of the other activities of the BEREC Office;
- Reply to ECA observations;
- Report to the Discharge Authority;
- Risk assessment workshop, risk management peer review;
- Maintenance of risk register and reporting on follow-up of most significant risks;

<sup>38</sup> During 2024 the Internal Audit Service performed the risk assessment in order to draft their 2025-2027 Strategic Internal Audit Plan, Ares (2024)5475071, therefore no specific audit findings are to be reported for 2024.

- Assessment of the efficiency and effectiveness of the internal control framework;
- Action Plan to address IAS recommendations;
- Effective cooperation with the host Member State authorities in the interest of the BEREC Office and its staff.

#### *III.2.6.a.3 Estimates of quantifiable workload drivers*

| Workload driver   | Latest result 2024    | Estimate 2026 |
|---|-----------------------|---------------|
| Programming, reporting, risk management and assessment of the effectiveness of the control system | 2023: 6               | 6             |
| Number of audits  | 2024: 3 <sup>39</sup> | 4             |

### **III.2.6.b Sub-activity - BEREC Office Communications activities**

#### *III.2.6.b.1 Overview of the sub-activity*

The BEREC Office will continue raising awareness of its work among citizens of the host country and other EU Member States by organizing various communications activities, a digital presence via the upgraded and expanded website and social media platforms and including those outlined in the Headquarters Agreement. In 2026, the Agency will focus on internal communications activities to engage and commit employees. These activities include organisational, operational, administrative, and inspirational news, information, and knowledge sharing. Additionally, the Agency will explore the possibility of establishing an internal online platform for availability and transparency of information in alignment with the BEREC Office Internal Communications Strategy and Internal Communications Plan 2026.

#### *III.2.6.b.2 Objectives, indicators, results and outputs*

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**Objective: To provide professional and administrative support to the BEREC Management Board in implementing the BEREC Office communications activities**

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<sup>39</sup> ECA audit, independent auditors audit and the Internal Audit for establishing the Strategic Internal Audit Plan for the period 2025-2027.

**Expected results:**

- Production of relevant communications and promotional items for the BEREC Office public events;
- Organisation of joint events;
- Production of information items (social media posts and visuals, newsletters, news, press releases; audio-visual material) targeted to the stakeholders in the host country;
- Production of promotional items of the Agency;
- Strengthening the BEREC Office recognition on social media;
- Production and distribution of internal newsletters to the staff of the Agency;
- Support to the implementation of the BEREC Office Internal Communications Strategy and Plan 2026;
- Development of the BEREC Office Internal Communications Plan 2027.

| Indicators  | Latest result<br>Year 2024 | Target Year<br>2026 | Means and frequency<br>of verification |
|---|----------------------------|---------------------|--|
| 1. Number of events   | 3                          | up to 4             | CAAR                                   |
| 2. External info items (social media uploads, news items, press releases) | 48                         | up to 50            | CAAR                                   |
| 3. Internal info items (newsletters)                                      | 25                         | up to 30            | CAAR                                   |

**Main outputs**

- Organisation and or participation to up to four BEREC Office public events;
- Production and distribution of information items (social media posts, newsletters, news, press releases, etc.);
- Production of a set of promotional items;
- Production and distribution of internal information items (newsletters to staff);
- BEREC Office Internal Communications Plan 2026;
- Creation and update of an internal collaboration online platform.

*III.2.6.1 Resources*

The total resources required for the III.2.6 Activity (horizontal) - General coordination activities are as follows:

| Financial resources (EUR) | FTEs |
|---------------------------|------|
| 904,336.84                | 5.3  |

### III.2.7 Activity (horizontal) - Legal services, procurement and data protection

#### III.2.7.1 Overview of the activity

The BEREC Office's activities in this area encompass the centralized management of the Agency's procurement procedures and signed legal commitments, provision of legal services to both BEREC and the BEREC Office<sup>40</sup>, and monitoring of compliance with the applicable legal framework. Additionally, the fraud prevention<sup>41</sup> and ensuring compliance with the data protection rules, including the provision of the function of Data Protection Officer (DPO), as well as coordinating litigation.

This activity also includes managing IT tools to support legal advice, procurement, contract registration, and data protection. Furthermore, developing and updating the internal instructions, guidelines and templates for staff in line with the legislation in force. Awareness-raising initiatives are also undertaken, including the dissemination of good administrative practices<sup>42</sup> and trainings on procurement, data protection, access to documents, and ethics, with a focus on avoidance of conflict of interest, for both BEREC and the BEREC Office.

#### III.2.7.2 Objectives, indicators, results and outputs

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**Objective 1: Timely provision of state-of-the-art supplies and services in support to BEREC and for the needs of the BEREC Office by considering the actions identified in environmental strategy<sup>43</sup> of the Agency**

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#### Expected results:

- Management of all procurement procedures, including reopening of competition and inter-

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<sup>40</sup> For example in the implementation of the BEREC and BEREC Office legal framework, such as: BEREC Regulation, Staff Regulation, Financial Regulation, Regulation on access to documents, etc.

<sup>41</sup> Including coordination of the relations with OLAF

<sup>42</sup> Incl. coordination of the relations with the Ombudsman

<sup>43</sup> As presented in Annex VI: Environmental management



institutional procurement procedures;

- Incorporation of green public procurement principles as far as possible in procurement procedures carried out by the Agency;
- Updating templates and the internal procurement procedures in the field of procurement;
- Maintenance and use of e-procurement tools (i.e. PPMT, Funding & Tender Portal, e-Submission) and usage of procurement platforms (provided by NAPO, EUAN and Latvian Government, i.e., EIS).

| Indicators  | Latest result<br>Year 2024  | Target Year<br>2026  | Means and frequency<br>of verification |
|---|---|--|--|
| 1. Number of launched procurement procedures per type (VLVP, LVP, MVP, OP, RoC and other).                                    | 22, of which<br>OP – 3<br>NP – 1<br>LVP – 1<br>VLVP – 6<br>ROC - 11 | 23, of which<br>OP – 4<br>MVP – 1<br>LVP – 1<br>VLVP – 5<br>ROC – 12                 | CAAR                                   |
| 2. Percentage of implemented procurement procedures within the timeframe as indicated in the Procurement Manual (Section 2.3) | 100%  | 100% out of all procurement procedure are implemented within the indicated timeframe | CAAR                                   |

### Main outputs

- Completed procurement documentation (including Procurement Plan and its up-date on request), including green public procurement principles, if applicable;
- Inter-institutional agreements (memoranda of understanding, delegation agreements, working arrangements and other documents) for participation in inter-institutional procurement procedures;
- Legal commitments (contracts, SLA, MoU, etc.);
- Documents relating to court decisions related to procurement/contracts;
- Management of the IT tools for procurement;
- Maintenance of registers and reporting (on procurement (BEREC Office and inter-institutional) and legal commitments).

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**Objective 2: Effective and efficient protection of personal data**


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**Expected results:**

- Compliance with EU data protection rules and enhanced awareness on data protection related issues.

| Indicators  | Latest result<br>Year 2024 | Target Year<br>2026                             | Means and frequency of<br>verification       |
|---|----------------------------|---|--|
| 1. Number of data protection policies (or DPO notification) in place compared to the number of processing operations identified | 85%                        | 90%   | Register of records of processing operations |
| 2. Number of personal data breaches notified to the EDPS  | 1                          | 0   | Data breach register                         |
| 3. Negative references to the BEREC Office in the European Data Protection Supervisor (EDPS) annual report                      | 0                          | 0   |  |
| 4. Number of internal trainings organised for newcomers   | 3                          | Training is provided to each group of newcomers | EU LEARN                                     |

|                     |
|---------------------|
| <b>Main outputs</b> |
|---------------------|

- Advice on data protection matters;
- Review of data protection policies prepared under the responsibility of the controller;
- Responses to requests from the EDPS;
- Responses to complaints and other requests from data subjects;
- Training sessions on the rules on data protection for the BEREC Office staff or members of BEREC Board of Regulators and its preparatory bodies;
- Maintenance of the DPO Register and of the Data Breach Register.

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**Objective 3: Compliance with the legal framework in place including timely processing of**


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### applications for access to documents

#### Expected results:

- Sufficient level of compliance with the legal framework, which ensures low risk of litigation;
- Use of good administrative practices by the Agency's staff;
- Fraud prevention and avoidance of conflict of interest.

| Indicators                                       | Latest result<br>Year 2024 | Target Year<br>2026 | Means and frequency of<br>verification |
|--|----------------------------|---------------------|--|
| 1. Applications processed within 15 working days | 100 %                      | 100 %               | CAAR                                   |

#### Main outputs

- Legal opinions and general legal advice in relation to the BEREC and BEREC Office legal framework (BEREC Regulation, Staff Regulation, Financial Regulation, Regulation on access to documents, etc.);
- Legal review of draft legal acts, BEREC Working Arrangements and Memoranda of Understanding;
- Documents relating to court cases with the exception of procurement/contract management;
- Templates for BEREC Office legal and administrative documents;
- Documentation in the area of fraud prevention and good administration (including contributions to surveys in that area);
- Maintenance of registers and reporting (exceptions and non-compliance events).

#### III.2.7.3 Resources

The total resources required for legal advice, data protection and procurement activities are, as follows:

| Financial resources (EUR) | FTEs |
|---------------------------|------|
| 404,230.28                | 2.62 |

#### III.2.7.4 Estimates of quantifiable workload drivers

| Workload driver  | Latest result 2024 | Estimate 2026 |
|--|--------------------|---------------|
| Number of procurement procedures   | 22                 | 23            |
| Number of legal opinions, advices and/or interpretation of existing applicable legislation | 86                 | 80            |
| Number of legal commitments registered in the Contract Register, ABAC and ARES             | 170                | 150           |

### III.2.8 Activity (horizontal) - Finance and Accounting

#### III.2.8.1 Overview of the activity

The activities of the BEREC Office in this area consist of managing the Agency's budget and ensuring that all financial transactions and workflows are executed in compliance with the requirements of the Financial Regulation. This activity also includes the timely preparation of all budgetary and legal commitments, payments, other financial documents and further reporting to the Authorising Officer(s) (by delegation) as well as the implementation of the activity based costing (ABC) and budgeting (ABB). It is also included developing and updating the internal instructions, guidelines and templates for staff in line with the legislation in force and full support for mission and authorised travel management. In addition, this activity covers also the tasks of drafting of provisional and final accounts.

#### III.2.8.2 Objectives, indicators, results and outputs

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#### Objective 1: Smooth running of activities linked to finance and budget management

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##### Expected results:

- Preparation of the draft budget, the financial statement, amended budget(s) and other documents in accordance with the legal requirements;
- Monitoring and coordination of the level of budget execution;
- Activity based budget and costing management;
- Ensure the ex-ante controls of the Agency's financial transactions;
- Implementation of efficient quality assurance measures within the BEREC Office internal control and risk management frameworks.

| Indicators   | Latest result<br>Year 2024 | Target Year<br>2026 | Means and frequency<br>of verification                   |
|--|----------------------------|---------------------|--|
| 1. Commitment appropriations' rate   | 100%                       | ≥95%                | Monthly reports, internal budget meetings, CAAR          |
| 2. Cancellation rate of commitment and payment appropriations carried over               | 2.77%                      | ≤5 %                | Internal budget meetings, CAAR, RBFM                     |
| 3. Payments of contractual obligations within the limits set by the Financial Regulation | 98.11%                     | ≥95 %               | Monthly reports, internal budgetary meetings, CAAR, RBFM |

### Main outputs

- Director's documentation (including internal administrative instructions letters, guidelines, policies, financial circuits, etc.);
- Financial transactions (budgetary commitments, invoices and asset registration, payments);
- Mission and authorised travel management and reimbursement;
- Monthly, quarterly, annual budget and financial reports;
- Draft/final BEREC Office Budget;
- Estimate and final financial statements for the financial years;
- Report on Budgetary and Financial Management;
- Implementation of the Activity-based budget management (ABM) practices (costing and budgeting);
- Management of the IT tools for the activity with the exception of the access rights to the accounting systems due to the requirement for segregation of duties.

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### Objective 2: Provision and maintenance of a robust, compliant and segregated accounting function

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#### Expected results:

- Implement the accounting rules and chart of accounts in accordance with the provisions adopted by the European Commission;
- Keep, prepare and present the annual accounts of BEREC Office (financial statements and reports on the implementation of the budget);
- Lay down and validating the accounting systems.

| Indicators   | Latest result<br>Year 2024 | Target Year<br>2026 | Means and frequency<br>of verification                          |
|--|----------------------------|---------------------|---|
| 1. Independent auditors audit reports  | Clean opinion              | Clean Opinion       | Bi-annually;<br>Opinion on provisional and<br>final accounts    |
| 2. Accounting Officer findings following<br>validation of accounting systems | 3 findings <sup>44</sup>   | ≤5 findings         | Monthly and quarterly<br>accounting checks, auditors<br>reports |

### Main outputs

- Accounting officer documentation (incl. guidelines, policies, etc.);
- Monthly and quarterly report on the quality of accounting;
- VAT exoneration;
- Provisional and final annual accounts;
- MB Opinion on final accounts;
- Validation of the accounting system.

### III.2.8.3 Resources

| Financial resources (EUR) | FTEs |
|---------------------------|------|
| 691,029.66                | 3.05 |

### III.2.8.4 Estimates of quantifiable workload drivers

| Workload driver                            | Latest result 2024 | Estimate 2026 |
|--|--------------------|---------------|
| Number of financial transactions processed | 5977               | 5670          |
| Reports on quality of accounting           | 16                 | 16            |

<sup>44</sup> The important issues identified during the 2024 accounting validation exercise make reference to the results of the 2023 neutral verification exercise, a follow-up of the 2023 inventory exercise and data quality of an audited transaction. It should be noted that no weaknesses were identified in the design or implementation of the local systems or that might have a material impact on the annual accounts.

|   |   |   |
|---|---|---|
| Accounting Officer documentations <sup>45</sup> | 4 | 4 |
|---|---|---|

### III.2.9 Activity (horizontal) - Human resources management

#### III.2.9.1 Overview of the activity

The current activity covers the tasks executed by the HR professionals (frequently referred to as the “Entity in charge of HR”) and includes numerous recurring tasks, related to the management of the Agency’s HR, such as: managing selection and recruitment procedures, establishing staff individual rights, running appraisal and reclassification procedures, managing leaves, monitoring the implementation of the hybrid working time arrangements, supporting the management of probationary periods, administrative inquiries, disciplinary measures, HR reporting, managing interim staff, etc.

While in 2026, the Agency’s entity in charge of HR will continue its efforts to retain and further develop the highly specialised staff through different measures, it will focus also on:



In parallel, the entity in charge of HR will continue its efforts to ensure paperless HR management by optimising and further expanding the use of the relevant European Commission’s tools (mainly Sysper2) made available to the decentralised agencies. The BEREC Office has already expressed interest for the deployment of the following additional Sysper 2 modules:

<sup>45</sup> Provisional and final account, validation of the accounting system, MB opinion on the accounts.



HR Reporting and  
Analytical services



Evaluation (EVAL) and  
Promotion (PROMO)

This task is exclusively depended on the will and availability of EC staff to further enhance the use of the available HR management tools for the Agencies.

Besides, of the above, the Agency in 2024 has signed new amendment of the SLA with DG HR, namely the appendix HR Transformation (HRT)<sup>46</sup> programme and related services. In the meantime, the Sysper2 will remain active, and will be harmonised and amended following the HRT waves of implementation.

### *III.2.9.2 Objectives, indicators, results and outputs*

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**Objective: To maintain the appropriate HR capacity in line with the Agency's updated multiannual staff policy plan approved by the MB and to develop the skills required to offer the necessary support to BEREC and its members.**

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#### **Expected results:**

- Timely payment of salaries to the staff;
- Recruitment of the staff in line with the Agency's updated multiannual staff policy plan and replace departing staff (if any) in an efficient and timely manner, and a high staff retention rate;
- Ensure adequate development opportunities through appropriate training courses including on the job training aimed to further develop existing skills and competencies which are to be considered during the annual appraisal and reclassification exercises;
- Continuation of the efforts for digitalising the HR management to the benefit of managers and staff and to ensure consistent application of the staff implementing rules throughout

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<sup>46</sup> HRT is the multiannual (from 2023 to 2029) flagship Commission programme for modernising and fully integrating the different Information Technology (IT) services provided by the HR family in close collaboration with DG DIGIT.



the Agency;

- Ensure that the legal basis in force and the procedures in place are up to date.

| Indicators   | Latest result<br>Year 2024  | Target Year<br>2026  | Means and frequency<br>of verification |
|--|---|--|--|
| 1. Fully staffed indicator (No of TAs, CAs, SNEs and interim staff / max. number of a fully staffed BEREK Office)  | 100% <sup>47</sup>  | 100%   | CAAR                                   |
| 2. Gender balance (TA, CA, SNE and Trainees)   | 51.06% Female<br>48.94% Male  | 50% Female<br>50% Male   | CAAR                                   |
| 3. Geographical balance (TA; CA; SNE and Trainees nationalities)   | representatives of<br>11 EU Member<br>States and 1<br>Western Balkan<br>State | representatives<br>of 15 EU<br>Member States<br>and 2 Western<br>Balkan States | CAAR                                   |
| 4. Staff turnover (Ratio of total number of leavers divided by average number of staff at the beginning period and end period <sup>48</sup> ) per category of staff and total:<br>a) establishment plan posts (TAs);<br>external staff:<br>b) CAs;<br>c) SNEs;<br>d) total (all staff: TAs+CAs+SNEs) | a) 5.88%<br>b) 0.00%<br>c) 23.53%<br>d) 6.32%                                 | Decrease   | CAAR                                   |

### Main outputs

- Salaries to staff are paid in a timely manner;
- Staff with the necessary knowledge and skills is recruited and retained in the Agency in line with the interest of the service and the applicable law;
- Learning and development activities are made available as per identified needs in the annual objectives and training plans of staff;
- Implementation and update, if needed, of policies and rules;

<sup>47</sup> At 31/12/2024 the Agency had 47 staff members in the following categories of staff: TAs, CAs, SNEs and interim workers

<sup>48</sup> Annual Turnover Rate % = (Number of employees who left/ (Beginning + ending number of employees)/ 2) x 100%

- Availability of interim workers in case of need in line with the internal policy.

### *III.2.9.3 Resources*

| Financial resources (EUR) | FTEs |
|---------------------------|------|
| 354,060.35                | 3.32 |

### *III.2.9.4 Estimates of quantifiable workload drivers*

| Workload driver  | Latest result 2024 | Estimate 2026 |
|--|--------------------|---------------|
| Number of selection procedures   | 2                  | max 5         |
| Number of staff managed (TA, CA, SNE, Interim workers)   | 52                 | 56            |
| HR documents not related to the number of staff (incl. data protection policies for processing of personal data) | 8                  | 10            |

## **III.2.10 Activity (horizontal) - ICT, security and document management**

### **III.2.10.a Sub-activity - ICT systems**

#### *III.2.10.a.1 Overview of the sub-activity*

During the course of 2026-2028, 100% of the Agency's ICT systems will be operational from ICT environments located outside of the Agency's premises in Riga. This will require an allocation of sufficient resources needed for ICT infrastructure services, licences, managed services, rented or own hardware, technical and security upgrades, connectivity and technical support works. In addition, the Agency will continue to assess the use of its ICT resources under new framework agreements and may further contribute towards overall efficiency and optimization of ICT resources. The Agency will continue to maintain reliable back-up and disaster-recovery solutions needed to comply with the Business continuity strategy. The Agency will further continue to use on-premises infrastructure and cloud-based infrastructure, ensuring security, scalability and cost-efficiency in IT operations.

In 2024, the BEREC Office has developed the ICT strategy 2024 – 2027. The document determines the current state of play from a technology point-of-view and future IT Strategy & Roadmap, considering legal requirements such as the requirements of the Cyber Security

Regulation. The implementation of the ICT strategy will continue during 2026-2028, which will require an allocation of necessary resources.

In 2026, the Agency will continue to implement the requirements of the newly applicable Cybersecurity Regulation and, if adopted by then, potentially also an Information Security Regulation. The overall aim of these implementations is to further strengthen inter-institutional co-operation, minimise risk exposure and improve the EU security culture. This will require the BEREC Office to allocate the necessary resources, both financial and human, with the activity started in 2025. This may also include trainings for personnel, raising awareness and contributing furthermore to ICT security.

### *III.2.10.a.2 Objectives, indicators, results and outputs*

#### **Objective 1: Achieve compliance with the cybersecurity regulation**

##### **Expected results:**

- Develop mandatory reviews, frameworks and controls;
- Implement mandatory measures and perform maturity assessments;
- Prepare a draft cybersecurity plan for review;
- Provide cybersecurity training and materials to management and staff;

| Indicators                             | Latest result<br>Year 2024 | Target Year<br>2026 | Means and frequency<br>of verification |
|--|----------------------------|---------------------|--|
| 1. Cybersecurity Regulation Compliance | N/A                        | TBC <sup>49</sup>   | Requirements and<br>deadlines met      |

##### **Main outputs**

- Achieve compliance with applicable cybersecurity standard/regulation;
- Improve the cybersecurity controls and the overall applied standard at the Agency.

<sup>49</sup> The compliance with the Regulation requirements will be partially possible if necessary resources are ensured in timely manner. Otherwise, partial compliance is expected based on best effort.

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**Objective 2: Provide ICT systems, services and infrastructure and ensure ICT security, confidentiality, integrity and availability of BEREC Office data and ICT systems**


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**Expected results:**

- Ensure reliable IT services to BEREC Office;
- Secure and reliable IT environment and guaranteed high level of availability of the BEREC Office corporate IT systems.

| Indicators                                   | Latest result<br>Year 2024 | Target Year<br>2026   | Means and frequency<br>of verification |
|--|----------------------------|---|--|
| 1. Timely response to user requests provided | 5.05%                      | <10% of user requests require more than 2.5 days to resolve | Reports from ticketing system          |
| 2. Infrastructure Utilization Rate           | N/A                        | >90 %   | CAAR                                   |

|                     |
|---------------------|
| <b>Main outputs</b> |
|---------------------|

- Ensured access to corporate tools and ICT systems including for database set-up, maintenance and management;
- Ensured IT support services to the BEREC Office;
- Optimised administration of IT infrastructure, security management and user performance;
- Ensured smooth running of the EC applications already in place such as ABAC, HAN, Sysper2, NDP, E-Procurement, EU-Sign, EU-Learn, MiPS, PPMT, etc. and continuous support to the staff with the deployment of / migration to any new applications;
- Ensured licences and maintenance subscriptions for IT products such as, Microsoft, Sophos, GlobalSign, Adobe, AutoCAD, Veeam, MDM solutions, etc.;
- Gradual replacement of hardware (servers, routers, computers and mobile phones) with more modern and secure operation;
- High-level security of IT operations. Ensured security measures and procedures are in place for the usage of tools and ICT systems;
- Usage of on-premises and cloud resources such as IaaS, SaaS and PaaS and dedicated managed services;

- Penetration testing of on-site systems and networks, verification of IT security compliance;
- Deployment and usage of IT audit software and EU Computer emergency response team (CERT) services;
- Organization of information security awareness training for BEREC Office staff;
- Implementation of IT security plan according to MC/2018/03 - BEREC Office MC Decision concerning the decision on IT security and ensuring compliance;
- Implementation of new regulations on cybersecurity and information security;

### **III.2.10.b Sub-activity - Security and business continuity of the Agency**

#### *III.2.10.b.1 Overview of the sub-activity*

In the course of 2026-2028, the Agency will continue to maintain high-level security standards by adopting security rules equivalent to the European Commission (EC).

Security improvements are essential for ensuring the Agency's premises meet the required security standards. The EC pointed out that the recommendations of its building inspecting report of the current premises need to be implemented. If a decision is taken not to implement these recommendations, the decision takers would become responsible for any negative consequences in case of incidents. The estimated cost for these improvements is EUR 244,066.31 as a one-time investment in 2026. Such improvements include additional security measures according to the security inspection done by the EC security services indicated under EC decision 2015/443 on Security in the Commission and according to the EC requirements laid out in the Manual of Standard Building Specifications.

While the building audit report acknowledges that certain security elements cannot be fully implemented due to the building being shared with other tenants, a visit of a DG HR & Security expert is planned for June to assess the feasibility of proposed alternative measures. In case these measures are not approved following the expert's visit, the BEREC Office will inform the Management Board accordingly.

Furthermore, a key responsibility will be to ensure the Agency's business continuity in order to withstand and protect from disruptions caused by external physical threats, major information systems failures, or natural disasters, and to ensure their timely resumption.

Taking into account the proximity to the warzone and the eastern border of the European Union, the possibility of further physical and hybrid security escalations in the region and the Member State cannot be excluded. The Agency will continue to allocate resources to improve the relevant procedures or adopt new measures in order to protect its staff, assets and premises.

### III.2.10.b.2 Objectives, indicators, results and outputs

**Objective:** Ensure proper functioning of the physical security systems of the Agency

#### Expected results

- Appropriate level of security and protection for the staff and visitors, safeguards of the Agency's assets (incl. informational).

| Indicators                                | Latest result<br>Year 2024 | Target<br>Year 2026 | Means and frequency of<br>verification  |
|---|----------------------------|---------------------|---|
| 1. Operational CCTV system                | 99%                        | ≥99%                | Reports on registered incidents through ticketing system;<br>Daily morning / evening checklist report |
| 2. Operational access control system      | 99%                        | ≥99%                | Reports on registered incidents through ticketing system;<br>Daily morning / evening checklist report |
| 3. Operational intrusion detection system | 99%                        | ≥99%                | Reports on registered incidents through ticketing system;<br>Daily morning / evening checklist report |

#### Main outputs

- Ensure continuous availability and performance of CCTV, access control and intrusion detection systems;
- Provide additional layer of security and protection.

### III.2.10.c Sub-activity - Facility management and logistics

#### III.2.10.c.1 Overview of the sub-activity

This sub-activity includes the Agency's actions related to management of premises used by the BEREC Office (including the access to public utility services), provision of logistics activities (such as postal and courier services, relocation services and others), premises maintenance, provision of office supplies and other materials necessary for the Agency's day-to-day operations.

In 2024, a comprehensive review of the premises project was initiated to provide the Management Board with updated information to support informed decision making. The review considered the following scenarios adapting the existing premises, joining the House of Europe project, or renting on the private market.

Following the review, adapting the existing premises was deemed the most viable and cost-effective option. The estimated total cost for the necessary works is approximately EUR 2.9 million. Given this significant amount, the BEREC Office divided the works into three categories: security enhancements (EUR 244,066.31), urgent refurbishment (EUR 1,715,969.50), and additional upgrades (EUR 925,902.02). Prioritizing the first two categories is recommended, entailing a one-time investment of EUR 244,066.31 for security improvements and EUR 1,715,969.50 for refurbishment works spread over 10 years.

As regarding other options, the EP has informed the BEREC Office and the European Commission that the EP is currently reviewing the overall concept of EP premises. At this stage the EP cannot provide a final answer about future actions. Renting on the private market does not prove to be a cost-effective option, as suitable premises would have a higher fee per square meter as compared to the revised rent in the current premises and the Agency would additionally need to invest in security measures beyond what is standard for regular office premises. Retaining the current premises and undertaking the recommended works is the most cost-effective solution.

The daily activities and objectives for 2026–2028 will depend on the progress made in the premises project. Additional resources will also be needed during the process to ensure the uninterrupted operation of the BEREC Office. Currently, the BEREC Office has only one Facilities Assistant (CA, FG III) assigned to this sub-activity. To address temporary requirements, the BEREC Office plans to utilize external services, either through contracts concluded by the lead contracting authority<sup>50</sup> and/or by employing interim workers<sup>51</sup>.

### *III.2.10.c.2 Objectives, indicators, results and outputs*

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**Objective: Managing the transition process of the premises project, with the goal of ensuring smooth processes and full business continuity and transitioning towards a fully digital and paperless working environment**

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<sup>50</sup> For example, contracts with local architects, legal or real estate consultants, to be financed within Title 2 of the BEREC Office budget.

<sup>51</sup> To be financed within Title 1 of the BEREC Office budget.

**Expected results:**

- Negotiation with the current property owner to agree on necessary adjustments to the BEREC Office premises; organization of arrangements during renovation and security works.
- Provision of logistical support to meet the Agency's needs, including office supplies and consumables;
- Provision of maintenance services to ensure the proper functioning of electrically adjustable office furniture.

| Indicators  | Latest result<br>Year 2024 | Target Year<br>2026 | Means and frequency<br>of verification |
|---|----------------------------|---------------------|--|
| 1. Occupancy rates of the offices according to EC building manual | 100%                       | 100%                | CAAR                                   |

**Main outputs**

- Negotiations with the current property owner to agree on necessary adjustments to the BEREC Office premises; preparation of arrangements during renovation and security works;
- Procure services and supplies necessary for the Agency's operations;
- Procure services required for the maintenance of electrically adjustable office furniture.

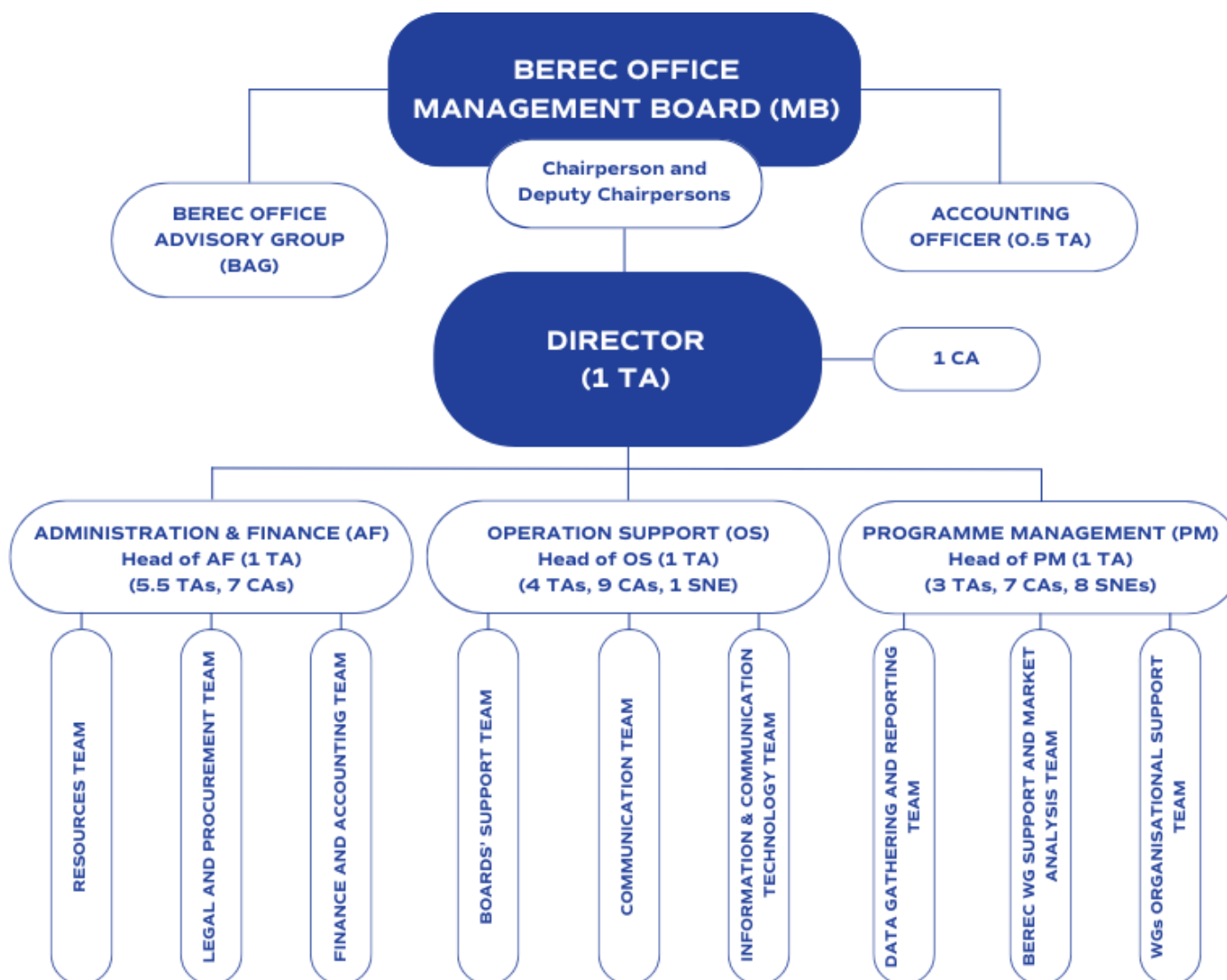
*III.2.10.1 Resources*

The total resources required for the III.2.10 Activity (horizontal) - ICT, security and document management are as follows:

| Financial resources (EUR) | FTEs |
|---------------------------|------|
| 2,285,991.48              | 7.25 |



## Annex I: Organisation chart<sup>52</sup>



<sup>52</sup> As of 2025. The organisation chart includes one additional CA for 2025 for cybersecurity and one temporary CA for procurement as further detailed in the document.

## Annex II: Resource allocation per BEREC Office activity for the period 2025-2028

| Annual activities  | Estimated 2025 |                |                      | Estimated 2026 <sup>53</sup> |                |                      | Estimated 2027 <sup>54</sup> |                |                      | Estimated 2028 <sup>55</sup> |                |                      |
|--|----------------|----------------|----------------------|------------------------------|----------------|----------------------|------------------------------|----------------|----------------------|------------------------------|----------------|----------------------|
|  | TA (FTE)       | CA & SNE (FTE) | Budget allocated EUR | TA (FTE)                     | CA & SNE (FTE) | Budget allocated EUR | TA (FTE)                     | CA & SNE (FTE) | Budget allocated EUR | TA (FTE)                     | CA & SNE (FTE) | Budget allocated EUR |
| <b>Operational Activities</b>                                    |                |                |                      |                              |                |                      |                              |                |                      |                              |                |                      |
| 2.1. Support to BEREC WGs, Sustainability ENG and phase II cases | 3.95           | 14.9           | 2,180,462.30         | 3.95                         | 14.9           | 2,201,574.30         | 3.95                         | 14.9           | 2,180,462.30         | 3.95                         | 14.9           | 2,224,071.55         |
| 2.2. High level meetings and support to the Boards               | 1.08           | 2              | 864,178.35           | 1.08                         | 2              | 867,627.95           | 1.08                         | 2              | 864,178.35           | 1.08                         | 2              | 881,461.92           |
| 2.3. ICT support to BEREC  | 0.87           | 3              | 940,137.49           | 0.87                         | 3              | 986,894.89           | 0.87                         | 3              | 1,032,560.49         | 0.87                         | 3              | 1,053,211.70         |
| 2.4. Information gathering and distribution                      | 0.13           | 0.1            | 29,566.37            | 0.13                         | 0.1            | 29,823.97            | 0.13                         | 0.1            | 29,566.37            | 0.13                         | 0.1            | 30,157.70            |
| 2.5. BEREC communications activities                             | 0.98           | 1.45           | 492,475.64           | 0.98                         | 1.45           | 495,197.24           | 0.98                         | 1.45           | 492,475.64           | 0.98                         | 1.45           | 502,325.16           |
| <b>TOTAL Operational Activities</b>                              | <b>7.01</b>    | <b>21.45</b>   | <b>4,506,820.15</b>  | <b>7.01</b>                  | <b>21.45</b>   | <b>4,581,118.35</b>  | <b>7.01</b>                  | <b>21.45</b>   | <b>4,599,243.15</b>  | <b>7.01</b>                  | <b>21.45</b>   | <b>4,691,228.01</b>  |
| <b>Horizontal Activities</b>                                     |                |                |                      |                              |                |                      |                              |                |                      |                              |                |                      |
| 2.6. General coordination activities                             | 2.9            | 2.4            | 898,400.84           | 2.9                          | 2.4            | 904,336.84           | 2.9                          | 2.4            | 898,400.84           | 2.9                          | 2.4            | 916,368.86           |
| 2.7 Legal services, procurement and data protection              | 1.67           | 1.95           | 401,295.88           | 1.67                         | 0.95           | 404,230.28           | 1.67                         | 0.95           | 401,295.88           | 1.67                         | 0.95           | 409,321.80           |

<sup>53</sup> Estimate calculated in accordance with ABB and management established at BEREC Office, as required by Article 23(2) of the BEREC Regulation

<sup>54</sup> idem

<sup>55</sup> idem

|   |              |              |                     |              |              |                     |              |              |                     |              |              |                     |
|---|--------------|--------------|---------------------|--------------|--------------|---------------------|--------------|--------------|---------------------|--------------|--------------|---------------------|
| 2.8 Finance and Accounting                  | 1.95         | 1.1          | 363,613.66          | 1.95         | 1.1          | 691,029.66          | 1.95         | 1.1          | 477,613.66          | 1.95         | 1.1          | 487,165.93          |
| 2.9. Human resources management             | 1.22         | 2.1          | 350,341.95          | 1.22         | 2.1          | 354,060.35          | 1.22         | 2.1          | 350,341.95          | 1.22         | 2.1          | 357,348.79          |
| 2.10. ICT, security and document management | 2.25         | 3.75         | 1,605,104.52        | 2.25         | 5            | 2,285,991.48        | 2.25         | 5            | 2,033,805.17        | 2.25         | 5            | 2,069,918.26        |
| <b>TOTAL Horizontal Activities</b>          | <b>9.99</b>  | <b>11.3</b>  | <b>3,618,756.85</b> | <b>9.99</b>  | <b>11.55</b> | <b>4,639,648.61</b> | <b>9.99</b>  | <b>11.55</b> | <b>4,161,457.50</b> | <b>9.99</b>  | <b>11.55</b> | <b>4,240,123.64</b> |
| <b>TOTAL</b>                                | <b>17.00</b> | <b>32.75</b> | <b>8,125,577.00</b> | <b>17.00</b> | <b>33.00</b> | <b>9,220,766.96</b> | <b>17.00</b> | <b>33.00</b> | <b>8,760,700.65</b> | <b>17.00</b> | <b>33.00</b> | <b>8,931,351.65</b> |

## Annex III: Financial Resources 2025 - 2028

Table 1 – Revenue

### General revenues

| REVENUES              | Estimated Revenues<br>2025 | Budget forecast<br>2026 |
|-----------------------|----------------------------|-------------------------|
| EU contribution       | 8,125,577.00               | 9,220,766.96            |
| Other revenue         | p.m.                       | p.m.                    |
| <b>TOTAL REVENUES</b> | <b>8,125,577.00</b>        | <b>9,220,766.96</b>     |

| Title | BL   |  | 2025 appropriations | 2026 estimate | 2027 estimate | 2028 estimate |
|-------|------|--|---------------------|---------------|---------------|---------------|
| s2    | 2000 | EU Contribution  |                     |               |               |               |
|       |      | Main EU subsidy  | 8,108,852.00        | 9,220,766.96  | 8,760,700.65  | 8,931,351.65  |
|       |      | Assigned revenues deriving from previous years surpluses                         | 16,725.00           | p.m           | p.m           | p.m           |
|       |      | Total Title 2:   | 8,125,577.00        | 9,220,766.96  | 8,760,700.65  | 8,931,351.65  |
| 3     | 3000 | Third countries contribution (incl. EFTA and candidate countries)                | p.m                 | p.m           | p.m           | p.m           |
|       |      | Total Title 3:   | p.m                 | p.m           | p.m           | p.m           |
| 4     | 4000 | Other contributions (Member States, NRAs, etc.)                                  | p.m                 | p.m           | p.m           | p.m           |
|       |      | Total Title 4:   | p.m                 | p.m           | p.m           | p.m           |
| 5     | 5000 | Administrative operations:   | p.m                 | p.m           | p.m           | p.m           |
|       |      | Interest generated by funds paid by the Commission by way of the EU contribution | p.m                 | p.m           | p.m           | p.m           |
|       |      | Other revenue from administrative operations                                     | p.m                 | p.m           | p.m           | p.m           |
|       |      | Total Title 5:   | p.m                 | p.m           | p.m           | p.m           |
|       |      | TOTAL REVENUE:   | 8,125,577.00        | 9,220,766.96  | 8,760,700.65  | 8,931,351.65  |

**Table 2 – Expenditure**

| Expenditure   | 2025                      |                        | 2026                      |                        |
|---|---------------------------|------------------------|---------------------------|------------------------|
|   | Commitment appropriations | Payment appropriations | Commitment appropriations | Payment appropriations |
| <b>Title 1 - Staff expenditure</b>  | 5,318,259.00              | 5,318,259.00           | 5,585,445.52              | 5,585,445.52           |
| <b>Title 2 - Buildings, equipment and miscellaneous operating expenditure</b> | 1,212,496.00              | 1,212,496.00           | 2,011,137.95              | 2,011,137.95           |
| <b>Title 3 - Operational expenditure</b>                                      | 1,594,822.00              | 1,594,822.00           | 1,624,183.49              | 1,624,183.49           |
| <b>TOTAL EXPENDITURE</b>  | <b>8,125,577.00</b>       | <b>8,125,577.00</b>    | <b>9,220,766.96</b>       | <b>9,220,766.96</b>    |

| Expenditure |   |              |              |               |                   |              |                |                |
|-------------|---|--------------|--------------|---------------|-------------------|--------------|----------------|----------------|
|             |   | Budget 2024  | Budget 2025  | VAR 2025/2024 | Draft Budget 2026 |              | Envisaged 2027 | Envisaged 2028 |
| 1           | TITLE 1 - STAFF EXPENDITURE                         |              |              |               | Agency request    | Final Budget |                |                |
| 1 1         | STAFF IN ACTIVE EMPLOYMENT                          |              |              |               |                   |              |                |                |
| 1100        | Temporary Agents' salaries and allowances           | 2,107,242.03 | 2,414,700.00 | 115%          | 2,475,529.40      |              | 2,474,368.46   | 2,523,855.83   |
|             | Total Article 110:                                  | 2,107,242.03 | 2,414,700.00 | 115%          | 2,475,529.40      |              | 2,474,368.46   | 2,523,855.83   |
| 1111        | Contract staff and Seconded National Experts (SNEs) | 1,945,235.21 | 2,259,000.00 | 116%          | 2,464,068.00      |              | 2,468,595.04   | 2,517,966.94   |
|             | Total Article 111:                                  | 1,945,235.21 | 2,259,000.00 | 116%          | 2,464,068.00      |              | 2,468,595.04   | 2,517,966.94   |

| Expenditure |  |                     |                     |               |                       |                     |                     |                     |
|-------------|--|---------------------|---------------------|---------------|-----------------------|---------------------|---------------------|---------------------|
|             |  | Budget 2024         | Budget 2025         | VAR 2025/2024 | Draft Budget 2026     |                     | Envisaged 2027      | Envisaged 2028      |
| <b>1</b>    | <b>TITLE 1 - STAFF EXPENDITURE</b>                                     |                     |                     |               | <b>Agency request</b> | <b>Final Budget</b> |                     |                     |
|             | <b>TOTAL CHAPTER 11:</b>   | <b>4,052,477.24</b> | <b>4,673,700.00</b> | <b>116%</b>   | <b>4,939,597.40</b>   |                     | <b>4,942,963.49</b> | <b>5,041,822.76</b> |
| <b>12</b>   | <b>MISCELLANEOUS EXPENDITURE ON STAFF RECRUITMENT AND TRANSFER</b>     |                     |                     |               |                       |                     |                     |                     |
| 1200        | Recruitment expenses   | 1,809.03            | 3,000.00            | 166%          | 3,006.00              |                     | 3,012.01            | 3,072.25            |
|             | <b>Total CHAPTER 12:</b>   | <b>1,809.03</b>     | <b>3,000.00</b>     | <b>166%</b>   | <b>3,006.00</b>       |                     | <b>3,012.01</b>     | <b>3,072.25</b>     |
| <b>13</b>   | <b>MISSIONS AND DUTY TRAVEL</b>  |                     |                     |               |                       |                     |                     |                     |
| 1300        | Mission expenses, duty travel expenses and other ancillary expenditure | 94,023.71           | 90,000.00           | 96%           | 90,180.00             |                     | 90,360.36           | 92,167.57           |
|             | <b>Total CHAPTER 13:</b>   | <b>94,023.71</b>    | <b>90,000.00</b>    | <b>96%</b>    | <b>90,180.00</b>      |                     | <b>90,360.36</b>    | <b>92,167.57</b>    |
| <b>14</b>   | <b>SOCIOMEDICAL SERVICES</b>   |                     |                     |               |                       |                     |                     |                     |
| 1400        | Medical service  | 4,111.00            | 7,000.00            | 170%          | 7,014.00              |                     | 7,028.03            | 7,168.59            |
|             | <b>TOTAL CHAPTER 14:</b>   | <b>4,111.00</b>     | <b>7,000.00</b>     | <b>170%</b>   | <b>7,014.00</b>       |                     | <b>7,028.03</b>     | <b>7,168.59</b>     |
| <b>15</b>   | <b>TRAININGS</b>   |                     |                     |               |                       |                     |                     |                     |
| 1500        | Training   | 60,587.38           | 74,368.00           | 123%          | 74,516.74             |                     | 74,665.77           | 76,159.08           |
|             | <b>TOTAL CHAPTER 15:</b>   | <b>60,587.38</b>    | <b>74,368.00</b>    | <b>123%</b>   | <b>74,516.74</b>      |                     | <b>74,665.77</b>    | <b>76,159.08</b>    |
| <b>16</b>   | <b>EXTERNAL SERVICES</b>   |                     |                     |               |                       |                     |                     |                     |
| 1600        | External services  | 702,512.04          | 466,991.00          | 66%           | 467,924.98            |                     | 468,860.83          | 478,238.05          |

| Expenditure |   |                     |                     |               |                       |                     |                     |                     |
|-------------|---|---------------------|---------------------|---------------|-----------------------|---------------------|---------------------|---------------------|
|             |   | Budget 2024         | Budget 2025         | VAR 2025/2024 | Draft Budget 2026     |                     | Envisaged 2027      | Envisaged 2028      |
| <b>1</b>    | <b>TITLE 1 - STAFF EXPENDITURE</b>  |                     |                     |               | <b>Agency request</b> | <b>Final Budget</b> |                     |                     |
|             | <b>TOTAL CHAPTER 16:</b>  | <b>702,512.04</b>   | <b>466,991.00</b>   | <b>66%</b>    | <b>467,924.98</b>     |                     | <b>468,860.83</b>   | <b>478,238.05</b>   |
| <b>17</b>   | <b>REPRESENTATION AND MISCELLANEOUS STAFF COSTS</b>                           |                     |                     |               |                       |                     |                     |                     |
| 1700        | Representation, receptions and events, and miscellaneous staff expenses       | 15,590.00           | 3,200.00            | 21%           | 3,206.40              |                     | 3,212.81            | 3,277.07            |
|             | <b>TOTAL CHAPTER 17:</b>  | <b>15,590.00</b>    | <b>3,200.00</b>     | <b>21%</b>    | <b>3,206.40</b>       |                     | <b>3,212.81</b>     | <b>3,277.07</b>     |
|             | <b>TOTAL TITLE 1:</b>   | <b>4,931,110.40</b> | <b>5,318,259.00</b> | <b>108%</b>   | <b>5,585,445.52</b>   |                     | <b>5,590,103.31</b> | <b>5,701,905.38</b> |
| <b>2</b>    | <b>TITLE 2 - BUILDINGS, EQUIPMENT AND MISCELLANEOUS OPERATING EXPENDITURE</b> |                     |                     |               |                       |                     |                     |                     |
| <b>20</b>   | <b>RENTAL OF BUILDINGS AND ASSOCIATED COSTS</b>                               |                     |                     |               |                       |                     |                     |                     |
| 2000        | Rent of building and associated costs   | 221,369.75          | 284,709.00          | 129%          | 513,429.07            |                     | 513,999.62          | 519,716.60          |
|             | <b>TOTAL CHAPTER 20:</b>  | <b>221,369.75</b>   | <b>284,709.00</b>   | <b>129%</b>   | <b>513,429.07</b>     |                     | <b>513,999.62</b>   | <b>519,716.60</b>   |
| <b>21</b>   | <b>DATA PROCESSING AND TELECOMMUNICATIONS</b>                                 |                     |                     |               |                       |                     |                     |                     |
| 2100        | Information and Communication Technology and Security                         | 1,170,170.62        | 670,632.00          | 57%           | 916,039.57            |                     | 673,317.21          | 686,783.55          |

| Expenditure |   |                     |                     |               |                       |                     |                     |                     |
|-------------|---|---------------------|---------------------|---------------|-----------------------|---------------------|---------------------|---------------------|
|             |   | Budget 2024         | Budget 2025         | VAR 2025/2024 | Draft Budget 2026     |                     | Envisaged 2027      | Envisaged 2028      |
| <b>1</b>    | <b>TITLE 1 - STAFF EXPENDITURE</b>                |                     |                     |               | <b>Agency request</b> | <b>Final Budget</b> |                     |                     |
|             | <b>TOTAL CHAPTER 21:</b>                          | <b>1,170,170.62</b> | <b>670,632.00</b>   | <b>57%</b>    | <b>916,039.57</b>     |                     | <b>673,317.21</b>   | <b>686,783.55</b>   |
| <b>22</b>   | <b>MOVABLE PROPERTY AND ASSOCIATED COSTS</b>      |                     |                     |               |                       |                     |                     |                     |
| 2200        | Movable property and logistic services            | 40,685.13           | 24,730.00           | 61%           | 24,779.46             |                     | 24,829.02           | 25,325.60           |
|             | <b>Total CHAPTER 22:</b>                          | <b>40,685.13</b>    | <b>24,730.00</b>    | <b>61%</b>    | <b>24,779.46</b>      |                     | <b>24,829.02</b>    | <b>25,325.60</b>    |
| <b>23</b>   | <b>CURRENT ADMINISTRATIVE EXPENDITURE</b>         |                     |                     |               |                       |                     |                     |                     |
| 2300        | Legal and other operating services                | 241,763.09          | 210,425.00          | 87%           | 534,845.85            |                     | 211,267.54          | 215,492.89          |
|             | <b>TOTAL CHAPTER 23:</b>                          | <b>241,763.09</b>   | <b>210,425.00</b>   | <b>87%</b>    | <b>534,845.85</b>     |                     | <b>211,267.54</b>   | <b>215,492.89</b>   |
| <b>24</b>   | <b>NON-OPERATIONAL MEDIA AND PUBLIC RELATIONS</b> |                     |                     |               |                       |                     |                     |                     |
| 2400        | Non-operational media and public relations        | 29,838.47           | 20,500.00           | 69%           | 20,541.00             |                     | 20,582.08           | 20,993.72           |
|             | <b>TOTAL CHAPTER 24:</b>                          | <b>29,838.47</b>    | <b>20,500.00</b>    | <b>69%</b>    | <b>20,541.00</b>      |                     | <b>20,582.08</b>    | <b>20,993.72</b>    |
| <b>25</b>   | <b>NON-OPERATIONAL MEETINGS</b>                   |                     |                     |               |                       |                     |                     |                     |
| 2500        | Non-operational meetings                          | 1,186.81            | 1,500.00            | 126%          | 1,503.00              |                     | 1,533.06            | 1,563.72            |
|             | <b>TOTAL CHAPTER 25:</b>                          | <b>1,186.81</b>     | <b>1,500.00</b>     | <b>126%</b>   | <b>1,503.00</b>       |                     | <b>1,533.06</b>     | <b>1,563.72</b>     |
|             | <b>TOTAL TITLE 2:</b>                             | <b>1,705,013.87</b> | <b>1,212,496.00</b> | <b>71%</b>    | <b>2,011,137.95</b>   |                     | <b>1,445,528.53</b> | <b>1,469,876.08</b> |



| Expenditure |  |                |                |                  |                   |              |                |                |
|-------------|--|----------------|----------------|------------------|-------------------|--------------|----------------|----------------|
|             |  | Budget<br>2024 | Budget<br>2025 | VAR<br>2025/2024 | Draft Budget 2026 |              | Envisaged 2027 | Envisaged 2028 |
| 1           | TITLE 1 - STAFF EXPENDITURE              |                |                |                  | Agency request    | Final Budget |                |                |
| 3           | TITLE 3 - OPERATIONAL EXPENDITURE        |                |                |                  |                   |              |                |                |
| 30          | BEREC PROGRAMME MANAGMENET SUPPORT       |                |                |                  |                   |              |                |                |
| 3001        | BEREC Programme Management Support       | 310,666.89     | 283,700.00     | 91%              | 284,267.40        |              | 334,835.93     | 341,505.05     |
|             | TOTAL CHAPTER 30:                        | 310,666.89     | 283,700.00     | 91%              | 284,267.40        |              | 334,835.93     | 341,505.05     |
| 31          | OPERATION AND STRATEGIC SUPPORT TO BEREC |                |                |                  |                   |              |                |                |
| 3101        | Operation and strategic support to BEREC | 986,013.55     | 1,311,122.00   | 133%             | 1,339,916.09      |              | 1,390,259.93   | 1,418,065.12   |
|             | TOTAL CHAPTER 31:                        | 986,013.55     | 1,311,122.00   | 133%             | 1,339,916.09      |              | 1,390,259.93   | 1,418,065.12   |
|             | TOTAL TITLE 3:                           | 1,296,680.44   | 1,594,822.00   | 123%             | 1,624,183.49      |              | 1,725,095.86   | 1,759,570.18   |
|             | TOTAL:                                   | 7,932,804.71   | 8,125,577.00   | 102%             | 9,220,766.96      |              | 8,760,727.71   | 8,931,351.65   |

**Table 3 - Budget outturn and cancellation of appropriations 2022-2024**

|  | <b>2022</b>      | <b>2023</b>                | <b>2024</b>      |
|--|------------------|----------------------------|------------------|
| <b>Revenue actually received (+)</b>   | 7,563,004.71     | 7,847,844.46 <sup>56</sup> | 8,103,295.77     |
| <b>Payments made (-)</b>   | -6,228,421.56    | -6,914,900.30              | -7,226,182.93    |
| <b>Carry-over of appropriations (-)</b>  | -1,282,248.72    | -981,050.08 <sup>57</sup>  | -952,825.90      |
| <b>Cancellation of appropriations carried over (+)</b>                                     | 30,848.31        | 13,817.68                  | 25,074.88        |
| <b>Adjustment for carry-over of assigned revenue appropriations from previous year (+)</b> | -51,285.99       | 51,324.12                  | 75,713.06        |
| <b>Exchange rate differences (+/-)</b>   | -0.04            | -310,51                    | 12.11            |
| <b>Adjustment for negative balance from previous year (-)</b>                              | 0                | 0                          | 0                |
|  | <b>31,896.71</b> | <b>16,725.37</b>           | <b>25,086.99</b> |

The BEREC Office Budget 2024, as adopted by the Management Board (MB), amounted to EUR 7,932,804.71 (in 2023 – EUR 7 697 264.87). The main revenue in the 2024 BEREC Office budget was the EU contribution, which was fully cashed.

In addition, as stated above, in line with the Service level agreement with the Latvian Government in 2024 the BEREC Office collected EUR 163,333.00 as a voluntary contribution from the host Member State (Latvia) to the BEREC Office Budget to cover partially the schooling fees of the children of the BEREC Office staff. BEREC Office also collected EUR 365.85 revenue from administrative and miscellaneous operations and EUR 7,124.71 as contribution from working arrangements concerning the participation of the Ukrainian National commission for the state regulation of electronic communications (NCEC) in BEREC and the BEREC Office. The contribution from the NCEC, Latvian side and the revenue from administrative and miscellaneous operations were assigned to the respective budget lines.

<sup>56</sup> Including 249.00 EUR of IC4 credits, which shall be regularized/cleared against non-budgetary account in 2024.

<sup>57</sup> Including 249.00 EUR of C4 credits, which shall be regularised/cleared against non-budgetary account in 2024.

**The financial results for the year 2024 were the best in the history of the BEREC Office.** All of the available financial C1 resources EUR 7,932,804.71 were committed (100% of the appropriations available for commitments) and EUR 7,067,419.54 were paid (89.09% of the appropriations available for payments). The amount of carry-overs to 2025 was also significantly reduced and reached an all-time low levels, namely EUR 876,222.91 – a significant reduction compared to previous years - 2023 (EUR 1,282,249) and 2024 (EUR 905,337).

At the end of 2024, the BEREC Office carried-over to 2025 following amounts:

- 6,947.28 R0 (assigned revenue) payment appropriations
- 869,275.63 of C1 (EU 2025 budget) payment appropriations

as follows:

Title 1: EUR 186,493.13 Staff related costs: Expenses for missions of staff in support to BEREC events that took place in Q4 2024 and will be paid in 2025, as well as the missions that will take place in 2025 Q1, but have been booked and arrangements done in the end of 2024; Staff trainings for which the contracts were signed in 2024 and will take place in Q1 2025; Liabilities under contracts for provision of interim workers' services concluded in 2024, for which the service provisions will continue in 2025.

Title 2: EUR 291,123.09 Building, equipment and miscellaneous operating expenditure: For invoices for services and supplies delivered in 2024 (mainly in December) for running costs, such as rent, utilities, security services, consumables, parking places, postal and telecommunications services, that will be received in 2025; Purchases of ICT goods and services for which contracts were signed in 2024 and for which services / goods will be delivered in 2025; Expenditure for on-going projects and activities which will be finalised in 2025 (independent audit of the 2024 annual accounts and others).

Title 3: EUR 398,609.69 Operational expenditure in support to BEREC: Expenses for reimbursement of participation in BEREC meetings and events held in the last quarter of 2024 which will be paid in the beginning of 2025 (such as BEREC Chairs and vice-Chairs travel, CN and Plenary meetings), as well as for the meetings and events that will take place early in 2025 (such as: WG support and experts' reimbursement, BEREC International travel). Expenses for services ordered in 2024, for which invoices will be received in 2025, such as the organisation of the BEREC Stakeholder forum. Liabilities under contracts for provision of ICT services and purchases of specialised software and/or hardware for the needs of BEREC in 2024, for which the invoices will be received in 2025 (ICT support to BEREC, fees for licenses and other ICT infrastructure and services);

Additional EUR 76,602.99 of R0 (assigned revenue) commitment appropriations were also carried over and will be used in 2025 for commitments in BL 1600 and 3101.

## Annex IV: Human resources - quantitative

Table 1 - Staff population and its evolution; Overview of all categories of staff

### A. Statutory staff and SNE

| Staff                           | 2024                                       |                                  |                  | 2025                                     | 2026                                       | 2027            | 2028            |
|---------------------------------|--|----------------------------------|------------------|--|--|-----------------|-----------------|
| ESTABLISHMENT PLAN POSTS        | Authorised Budget                          | Actually filled as of 31/12/2024 | Occupancy rate % | Authorised staff                         | Envisaged staff                            | Envisaged staff | Envisaged staff |
| Administrators (AD)             | 14   | 14                               | 100%             | 14                                       | 14   | 14              | 14              |
| Assistants (AST)                | 3  | 3                                | 100%             | 3  | 3  | 3               | 3               |
| Assistants/Secretaries (AST/SC) | 0  | 0                                | 100%             | 0  | 0  | 0               | 0               |
| TOTAL ESTABLISHMENT PLAN POSTS  | 17   | 17                               | 100%             | 17                                       | 17   | 17              | 17              |
| EXTERNAL STAFF                  | FTE corresponding to the authorised budget | Executed FTE as of 31/12/2024    | Execution Rate % | Headcount as of 31/12/2025 <sup>58</sup> | FTE corresponding to the authorised budget | Envisaged FTE   | Envisaged FTE   |

<sup>58</sup> As approved by the MB based on the available appropriations.

| Staff                           | 2024 |                 |      | 2025             | 2026             | 2027 | 2028 |
|---------------------------------|------|-----------------|------|------------------|------------------|------|------|
| Contract Agents (CA)            | 22   | 22              | 100% | 24 <sup>59</sup> | 24 <sup>60</sup> | 24   | 24   |
| Seconded National Experts (SNE) | 9    | 8 <sup>61</sup> | 89%  | 9                | 9                | 9    | 9    |
| TOTAL EXTERNAL STAFF            | 31   | 30              | 97%  | 33               | 33               | 33   | 33   |
| TOTAL STAFF                     | 48   | 47              | 98%  | 51               | 50               | 50   | 50   |

#### B. Additional external staff expected to be financed from grant, contribution or service-level agreements

| Human Resources                 | 2025          | 2026          | 2027          | 2028          |
|---------------------------------|---------------|---------------|---------------|---------------|
|                                 | Envisaged FTE | Envisaged FTE | Envisaged FTE | Envisaged FTE |
| Contract Agents (CA)            | 0             | 0             | 0             | 0             |
| Seconded National Experts (SNE) | 0             | 0             | 0             | 0             |
| TOTAL                           | 0             | 0             | 0             | 0             |

<sup>59</sup> Including one CA FGIV - contract with a limited perspective in time for a fixed period of one year to replace a member of the temporary staff (AD7) who is replacing a member of the temporary staff (AD11) on long-term leave and one CA FGIV - Cybersecurity and Compliance Officer.

<sup>60</sup> Including one CA FGIV – Cybersecurity Officer

<sup>61</sup> Including one accepted offer letter for SNE from 01.01.2025

**C. Other Human Resources**

| <b>Structural service providers<sup>62</sup></b> | <b>Actually in place as of 31/12/2024,<br/>expressed in FTEs</b> |
|--|--|
| <b>Security guards</b>                           | 6.4 <sup>63</sup>  |
| <b>IT on-site support</b>                        | 2  |
| <b>On-site premises cleaning</b>                 | 1.5 <sup>64</sup>  |

| <b>Interim workers</b> | <b>Total FTEs in year 2024</b> |
|------------------------|--------------------------------|
| <b>Number</b>          | 5 <sup>65</sup>                |

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<sup>62</sup> Service providers are contracted by a private company and carry out specialised outsourced tasks of a horizontal/support nature. At the Commission, following general criteria should be fulfilled: 1) no individual contract with the Commission 2) on the Commission premises, usually with a PC and desk 3) administratively followed by the Commission (badge, etc.) and 4) contributing to the added value of the Commission.

<sup>63</sup> Includes 2 physical security guard posts serviced 13.5 h per day (3.4 FTE) and 1 physical security guard post serviced 24/7 (3 FTE)

<sup>64</sup> Day cleaner 6h/day, 3 cleaners 2 h/day each. 12/8=1.5 FTE for the whole year

<sup>65</sup> 4 FTE for replacement of vacant posts and absent staff, 1 FTE covering capacities which are not available at the Agency

**Table 2 - Multi-annual staff policy plan 2026 - 2028**

| Function group<br>and grade | 2024               |                    |                                |                    | 2025              |                | 2026           |                | 2027           |                | 2028           |                |
|-----------------------------|--------------------|--------------------|--------------------------------|--------------------|-------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
|                             | Authorised budget  |                    | Actually filled as of<br>31/12 |                    | Authorised budget |                | Envisaged      |                | Envisaged      |                | Envisaged      |                |
|                             | Permanent<br>posts | Temporary<br>posts | Permanent<br>posts             | Temporary<br>posts | Perm.<br>posts    | Temp.<br>posts | Perm.<br>posts | Temp.<br>posts | Perm.<br>posts | Temp.<br>posts | Perm.<br>posts | Temp.<br>posts |
| AD 16                       |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AD 15                       |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AD 14                       |                    | 1                  |                                | 1                  |                   | 1              |                | 1              |                | 1              |                | 1              |
| AD 13                       |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AD 12                       |                    | 1                  |                                |                    |                   | 2              |                | 2              |                | 2              |                | 2              |
| AD 11                       |                    | 1                  |                                | 2                  |                   | 2              |                | 2              |                | 2              |                | 2              |
| AD 10                       |                    | 2                  |                                | 1                  |                   | 2              |                | 2              |                | 2              |                | 2              |
| AD 9                        |                    | 1                  |                                | 2                  |                   | 3              |                | 3              |                | 3              |                | 3              |
| AD 8                        |                    | 3                  |                                |                    |                   | 2              |                | 2              |                | 2              |                | 2              |
| AD 7                        |                    | 4                  |                                | 6                  |                   | 2              |                | 2              |                | 2              |                | 2              |
| AD 6                        |                    | 1                  |                                | 1                  |                   |                |                |                |                |                |                |                |
| AD 5                        |                    |                    |                                | 1                  |                   |                |                |                |                |                |                |                |
| AD<br>TOTAL                 |                    | 14                 |                                | 14                 |                   | 14             |                | 14             |                | 14             |                | 14             |

| Function group<br>and grade | 2024               |                    |                                |                    | 2025              |                | 2026           |                | 2027           |                | 2028           |                |
|-----------------------------|--------------------|--------------------|--------------------------------|--------------------|-------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
|                             | Authorised budget  |                    | Actually filled as of<br>31/12 |                    | Authorised budget |                | Envisaged      |                | Envisaged      |                | Envisaged      |                |
|                             | Permanent<br>posts | Temporary<br>posts | Permanent<br>posts             | Temporary<br>posts | Perm.<br>posts    | Temp.<br>posts | Perm.<br>posts | Temp.<br>posts | Perm.<br>posts | Temp.<br>posts | Perm.<br>posts | Temp.<br>posts |
| AST 11                      |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST 10                      |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST 9                       |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST 8                       |                    |                    |                                |                    |                   |                |                |                |                | 1              |                | 1              |
| AST 7                       |                    | 1                  |                                |                    |                   | 1              |                | 1              |                | 1              |                | 1              |
| AST 6                       |                    | 1                  |                                | 1                  |                   | 2              |                | 1              |                |                |                |                |
| AST 5                       |                    |                    |                                |                    |                   |                |                | 1              |                | 1              |                | 1              |
| AST 4                       |                    | 1                  |                                |                    |                   |                |                |                |                |                |                |                |
| AST 3                       |                    |                    |                                | 2                  |                   |                |                |                |                |                |                |                |
| AST 2                       |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST 1                       |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST<br>TOTAL                |                    | 3                  |                                | 3                  |                   | 3              |                | 3              |                | 3              |                | 3              |
| AST/SC<br>6                 |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |



| Function group<br>and grade | 2024               |                    |                                |                    | 2025              |                | 2026           |                | 2027           |                | 2028           |                |
|-----------------------------|--------------------|--------------------|--------------------------------|--------------------|-------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
|                             | Authorised budget  |                    | Actually filled as of<br>31/12 |                    | Authorised budget |                | Envisaged      |                | Envisaged      |                | Envisaged      |                |
|                             | Permanent<br>posts | Temporary<br>posts | Permanent<br>posts             | Temporary<br>posts | Perm.<br>posts    | Temp.<br>posts | Perm.<br>posts | Temp.<br>posts | Perm.<br>posts | Temp.<br>posts | Perm.<br>posts | Temp.<br>posts |
| AST/SC<br>5                 |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST/SC<br>4                 |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST/SC<br>3                 |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST/SC<br>2                 |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST/SC<br>1                 |                    |                    |                                |                    |                   |                |                |                |                |                |                |                |
| AST/SC<br>TOTAL             |                    | 0                  |                                | 0                  |                   | 0              |                | 0              |                | 0              |                | 0              |
| TOTAL                       |                    | 3                  |                                | 3                  |                   | 3              |                | 3              |                | 3              |                | 3              |
| GRAND<br>TOTAL              | 17                 |                    | 17                             |                    | 17                |                | 17             |                | 17             |                | 17             |                |

- External personnel

*Contract Agents*

| Contract Agents    | FTE corresponding to the authorised budget 2024 | Executed FTE as of 31/12/2024 | Headcount as of 31/12/2024 | FTE corresponding to the authorised budget 2025 | FTE corresponding to the authorised budget 2026 | FTE corresponding to the authorised budget 2027 | FTE corresponding to the authorised budget 2028 |
|--------------------|---|-------------------------------|----------------------------|---|---|---|---|
| Function Group IV  | 12  | 12                            | 12                         | 14 <sup>66</sup>                                | 14 <sup>67</sup>                                | 14  | 14  |
| Function Group III | 6   | 6                             | 6                          | 6   | 6   | 6   | 6   |
| Function Group II  | 4   | 4                             | 4                          | 4   | 4   | 4   | 4   |
| Function Group I   | 0   | 0                             | 0                          | 0   | 0   | 0   | 0   |
| <b>TOTAL</b>       | <b>22</b>                                       | <b>22</b>                     | <b>22</b>                  | <b>24</b>                                       | <b>24</b>                                       | <b>24</b>                                       | <b>24</b>                                       |

*Seconded National Experts*

| Seconded National Experts | FTE corresponding to the authorised budget 2024 | Executed FTE as of 31/12/2024 | Headcount as of 31/12/2024 | FTE corresponding to the authorised budget 2025 | FTE corresponding to the authorised budget 2026 | FTE corresponding to the authorised budget 2027 | FTE corresponding to the authorised budget 2028 |
|---------------------------|---|-------------------------------|----------------------------|---|---|---|---|
| <b>TOTAL</b>              | <b>9</b>  | <b>8</b>                      | <b>8</b>                   | <b>9</b>  | <b>9</b>  | <b>9</b>  | <b>9</b>  |

<sup>66</sup> Including one CA FGIV, contracted for a fixed period of one year to replace a staff member assigned temporarily to a middle management post, due to the long-term absence of the post's incumbent and one CA FGIV - Local Cybersecurity Officer.

<sup>67</sup> Including one CA FGIV – Cybersecurity Policy and Compliance Officer. In parallel, the BEREC Office is working on alternative solutions, putting significant effort in co-operating with other bodies and central services. In case the BEREC Office would obtain operational support from other central services and bodies in 2026 and could use new corporate solutions that are under development, the BEREC Office could rely on these resources provided it receives the necessary financial resources.

**Table 3 - Recruitment forecasts for 2026 following retirement/mobility or new requested posts**

(information on the entry level for each type of posts: indicative table)

| Job title in the Agency                     | Type of contract<br>(Official, TA or CA) |  | TA/Official  |                     | CA   |
|---|--|--|--|---------------------|--|
|   |  |  | Function group/grade of recruitment internal (Brackets) and external (single grade) foreseen for publication * |                     | Recruitment Function Group (I, II, III and IV) |
|   | Due to foreseen retirement/ mobility     | New post requested due to additional tasks | Internal (brackets)  | External (brackets) |  |
| Cybersecurity Policy and Compliance Officer | N/A                                      | CA   | N/A  | N/A                 | IV   |

\* Indication of both is required

Number of inter-agency mobility Year 2025: 0

## Annex V: Human resources - qualitative

### A. Recruitment policy

Implementing rules in place

| Subject           | Model Decision             | Yes | No | If no, which other implementing rules are in place |
|-------------------|----------------------------|-----|----|--|
| Engagement of CA  | Model Decision C(2019)3016 | x   |    |  |
| Engagement of TA  | Model Decision C(2015)1509 | x   |    |  |
| Middle management | Model decision C(2018)2542 | x   |    |  |
| Type of posts     | Model Decision C(2018)8800 | x   |    |  |

### B. Appraisal of performance and reclassification/promotions

Implementing rules in place:

| Subject                | Model Decision             | Yes | No | If no, which other implementing rules are in place |
|------------------------|----------------------------|-----|----|--|
| Reclassification of TA | Model Decision C(2015)9560 | x   |    |  |
| Reclassification of CA | Model Decision C(2015)9561 | x   |    |  |

**Table 1 - Reclassification of temporary staff/promotion of officials**

|        | Average seniority in the grade among reclassified staff |      |      |      |      |                             |   |
|--------|---|------|------|------|------|-----------------------------|---|
| Grades | 2020  | 2021 | 2022 | 2023 | 2024 | Actual average over 5 years | Average over 5 years<br>(According to decision C(2015)9563) |
| AD05   |   |      |      |      |      |                             | 2.8   |
| AD06   |   |      | 2.8  | 3.58 | 2.71 |                             | 2.8   |
| AD07   |   |      |      |      |      |                             | 2.8   |
| AD08   | 4.25  | 4.00 |      |      |      |                             | 3   |
| AD09   | 3.71  |      |      | 2.75 |      |                             | 4   |
| AD10   |   | 4.42 |      | 3    |      |                             | 4   |
| AD11   |   |      |      |      |      |                             | 4   |
| AD12   |   |      |      |      |      |                             | 6.7   |
| AD13   |   |      |      |      |      |                             | 6.7   |
| AST1   |   |      |      |      |      |                             | 3   |
| AST2   |   |      |      |      |      |                             | 3   |
| AST3   | 2.83  |      |      |      |      |                             | 3   |
| AST4   |   |      | 3    |      |      |                             | 3   |
| AST5   |   |      | 4    |      |      |                             | 4   |
| AST6   |   |      |      |      |      |                             | 4   |

| Grades                      | 2020 | 2021 | 2022 | 2023 | 2024 | Actual average<br>over 5 years | Average over 5 years<br>(According to decision<br>C(2015)9563) |
|-----------------------------|------|------|------|------|------|--------------------------------|--|
| AST7                        |      |      |      |      |      |                                | 4  |
| AST8                        |      |      |      |      |      |                                | 4  |
| AST9                        |      |      |      |      |      |                                | N/A  |
| AST10<br>(Senior assistant) |      |      |      |      |      |                                | 5  |
|                             |      |      |      |      |      |                                |  |
| AST/SC1                     |      |      |      |      |      |                                | 4  |
| AST/SC2                     |      |      |      |      |      |                                | 5  |
| AST/SC3                     |      |      |      |      |      |                                | 5.9  |
| AST/SC4                     |      |      |      |      |      |                                | 6.7  |
| AST/SC5                     |      |      |      |      |      |                                | 8.3  |

**Table 2 - Reclassification of contract staff**

| <b>Function Group</b> | <b>Grade</b> | <b>Staff in activity at 01.01.2023</b> | <b>How many staff members were reclassified in Year 2024</b> | <b>Average number of years in grade of reclassified staff members</b> | <b>Average number of years in grade of reclassified staff members according to Decision C(2015)9561</b> |
|-----------------------|--------------|--|--|---|---|
| <b>CA IV</b>          | 17           |  |  |   | Between 6 and 10 years  |
|                       | 16           | 4                                      |  |   | Between 5 and 7 years   |
|                       | 15           | 2                                      |  |   | Between 4 and 6 years   |
|                       | 14           | 5                                      | 2  | 3.95  | Between 3 and 5 years   |
|                       | 13           |  |  |   | Between 3 and 5 years   |
| <b>CA III</b>         | 11           |  |  |   | Between 6 and 10 years  |
|                       | 10           |  |  |   | Between 5 and 7 years   |
|                       | 9            | 2                                      |  |   | Between 4 and 6 years   |
|                       | 8            | 3                                      | 1  | 3.16  | Between 3 and 5 years   |
| <b>CA II</b>          | 6            |  |  |   | Between 6 and 10 years  |
|                       | 5            | 3                                      |  |   | Between 5 and 7 years   |
|                       | 4            | 1                                      | 1  | 3.08  | Between 3 and 5 years   |
| <b>CA I</b>           | 2            |  |  |   | Between 6 and 10 years  |
|                       | 1            |  |  |   | Between 3 and 5 years   |

## C. Gender representation

**Table 1 - Data on 31/12/2024 /statutory staff (only officials, TA and CA)**

|                    |                                | Official <sup>68</sup> |     | Temporary |     | Contract Agents |     | Grand Total |     |
|--------------------|--------------------------------|------------------------|-----|-----------|-----|-----------------|-----|-------------|-----|
|                    |                                | Staff                  | %   | Staff     | %   | Staff           | %   | Staff       | %   |
| <b>Female</b>      | Administrator level            | N/A                    | N/A | 5         | 36  | 8               | 67  | 13          | 59  |
|                    | Assistant level (AST & AST/SC) | N/A                    | N/A | 3         | 100 | 6               | 60  | 9           | 41  |
|                    | <b>Total</b>                   | N/A                    | N/A | 8         | 47  | 14              | 64  | 22          | 56  |
| <b>Male</b>        | Administrator level            | N/A                    | N/A | 9         | 64  | 4               | 33  | 13          | 76  |
|                    | Assistant level (AST & AST/SC) | N/A                    | N/A | 0         | 0   | 4               | 40  | 4           | 24  |
|                    | <b>Total</b>                   | N/A                    | N/A | 9         | 53  | 8               | 36  | 17          | 44  |
| <b>Grand Total</b> |                                | N/A                    | N/A | 17        | 100 | 22              | 100 | 39          | 100 |

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<sup>68</sup> The BEREK Office has no officials in its establishment plan



**Table 2 - Data regarding gender evolution over 5 years of the Middle and Senior management<sup>69</sup>**

|                        | 2020   |                  | 2024   |                  |
|------------------------|--------|------------------|--------|------------------|
|                        | Number | %                | Number | %                |
| <b>Female Managers</b> | 1      | 25 <sup>70</sup> | 2      | 40 <sup>71</sup> |
| <b>Male Managers</b>   | 3      | 75 <sup>72</sup> | 3      | 60 <sup>73</sup> |

**In case of significant continuous imbalance, please explain and detail action plan implemented in the agency.**

Due to its small size the BEREC Office has only one senior management position - that of the Director. For the same reasons, until recently there were only two middle management positions irrespectively of the fact that the BEREC Office had three Units<sup>74</sup>. With the assignment of new tasks to the BEREC Office with the new BEREC Regulation the number of staff of the third BEREC Office Unit was increased. Therefore, the Management Board decided to create an additional middle management post to ensure better management of the Agency's human resources. The establishment of an additional middle management post has led to a change in the established 50/50% balance in senior and middle management positions.

It should be pointed out that when engaging temporary staff (including management positions) the BEREC Office applies the principle of equality of the Union's citizens and staff are recruited only on the basis of their merit, as required by the Staff Regulations.

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<sup>69</sup> Staff who is defined as middle manager by the applicable General Implementing provisions on middle management.

<sup>70</sup> Which corresponds to 1 female middle manager

<sup>71</sup> Out of which: 1 female senior manager and 1 female middle manager on long term absence

<sup>72</sup> Out of which: 1 male senior manager and 2 male middle managers

<sup>73</sup> Which corresponds to 2 male middle managers and 1 male middle manager ad interim

<sup>74</sup> At that time the Director was also the head of one of the Agency's Units.

## D. Geographical balance

Explanatory figures to highlight nationalities of staff (split per Administrator/CA FG IV and Assistant /CA FG I, II, III)

**Table 1 - Data on 31/12/2024 - statutory staff only (officials, TAs and CAs)**

| Nationality    | AD + CA FG IV |   | AST/SC-AST + CA FGI/CA FGII/CA FGIII |  | TOTAL  |                  |
|----------------|---------------|---|--------------------------------------|--|--------|------------------|
|                | Number        | % of total staff members in AD and FG IV categories | Number                               | % of total staff members in AST SC/AST and FG I, II and III categories | Number | % of total staff |
| Latvia         | 9             | 34.6  | 13                                   | 100  | 22     | 56.4             |
| Lithuania      | 3             | 11.5  |                                      |  | 3      | 7.7              |
| Hungary        | 2             | 7.7   |                                      |  | 2      | 5.1              |
| Bulgaria       | 2             | 7.7   |                                      |  | 2      | 5.1              |
| Germany        | 4             | 15.4  |                                      |  | 4      | 10.3             |
| Italy          | 1             | 3.8   |                                      |  | 1      | 2.56             |
| Czech Republic | 1             | 3.8   |                                      |  | 1      | 2.6              |
| Greece         | 1             | 3.8   |                                      |  | 1      | 2.6              |
| Poland         | 1             | 3.8   |                                      |  | 1      | 2.6              |

| Nationality  | AD + CA FG IV |   | AST/SC-AST + CA FG I/CA FG II/CA FG III |  | TOTAL  |                  |
|--------------|---------------|---|---|--|--------|------------------|
|              | Number        | % of total staff members in AD and FG IV categories | Number                                  | % of total staff members in AST SC/AST and FG I, II and III categories | Number | % of total staff |
| Romania      | 2             | 7.7   |   |  | 2      | 5.1              |
| <b>TOTAL</b> | 26            | 100   | 13                                      | 100  | 39     | 100              |

Table 2 - Evolution over 5 years of the most represented nationality in the Agency

| Most represented nationality | 2020   |    | 2024   |      |
|------------------------------|--------|----|--------|------|
|                              | Number | %  | Number | %    |
| Latvia                       | 15     | 44 | 22     | 56.4 |

## E. Schooling

| Agreement in place with the European School(s) of ..... None           |     |  |    |   |
|--|-----|--|----|---|
| Contribution agreements signed with the EC on type I European schools  | Yes |  | No | X |
| Contribution agreements signed with the EC on type II European schools | Yes |  | No | X |

|   |   |
|---|---|
| <b>Number of service contracts in place with international schools:</b>   | 6 |
| <p><b>Description of any other solutions or actions in place:</b></p> <p>The Service level agreement (SLA) between the Government of the Republic of Latvia and the BEREC Office has been signed on 16.06.2022. The SLA states that the host Member State undertakes to facilitate access to the education system and contribute to the schooling costs of the children of the staff of the Agency within the limits of the budget available, until the accredited European school is established and is covering all sections and classes needed for the children of the Agency's staff.</p> <p>Schooling costs are co-financed up to EUR 8 000 per year or up to EUR 667 per month per child enrolled in the International School of Latvia or the education institutions operating according to the International School Law in regular full-time attendance at a primary or secondary level from the age of five.</p> <p>The financial contribution from the Latvian Government to the schooling costs is considered as assigned revenue.</p> |   |

## **Annex VI: Environment management**

Planning the years ahead, it is essential to consider the effect of its activities on the environment while maintaining the effective and efficient operation of BEREC and BEREC Office. Therefore, the strategic objectives should also consider the environmental footprint of BEREC and BEREC Office.

For that purpose, an Expert Networking Group (ENG) on Sustainability (SUST-ENG) has been established and tasked with:

- the estimation of the environmental footprint for BEREC / BEREC Office's own activities on an annual basis, and
- the preparations of proposals for a more environmental friendly BEREC operation by assessing methods for reducing these footprints;

The ENG has taken concrete steps already in the previous years and developed proposals that have been approved for implementation at the 52nd Ordinary Plenary Meeting of the BEREC Office Management Board (MB). By doing so, BEREC and the BEREC Office are meeting their responsibility to lead by example in the transition towards a climate neutral society in accordance with the political goals of the EU Green Deal and are following the lead of the European Commission which has adopted its Greening the Commission Communication (C(2022) 2230 final) in April 2022.

In particular, the intention is to keep striving for even lower levels of emissions and carbon neutral operations after the significant reduction (more than 80%) during the COVID-19 pandemic and to keep striving for even lower levels of emissions and carbon neutral operations. With the reductions achieved during 2020-2022, BEREC and the BEREC Office is working towards achieving the European Commission's own goal of a 55% reduction of GHG emissions by 2030 in comparison to average emission levels before COVID-19. This provides a good basis for BEREC and the BEREC Office to be ambitious in their decarbonisation strategy.

The BEREC Office developed a Multiannual Greening Action Plan for BEREC and the BEREC Office, including targets and steps for GHG reduction, which was submitted for BoR approval at Plenary 1 2024. One of the aims is to achieve the EMAS certification by the end of 2025. The BEREC Office Management Board agreed with the adoption of the EUAN Green Charter for the BEREC Office and authorized the Director to sign the Charter on behalf of the Agency, referring only to the activities of the BEREC Office.

### **Multiannual Greening Action Plan**

While EMAS is the management instrument, developed by the European Commission, to evaluate, report and improve environmental performance, BEREC's Greening Action Plan lays out the goals, targets and main actions that BEREC and the BEREC Office is committed to. The EC's Greening Communication and its 'Feasibility and scoping study for the Commission to become climate neutral by 2030', as well as similar efforts from other (decentralised) EU agencies have to provide guidance on the scope of the Action Plan which takes into account the specificities of BEREC's and the BEREC Office's operations and organisational size.

The Multiannual Greening Action Plan was elaborated and was adopted in early 2024; it is developed in harmony with the requirements of the EMAS certification and draw on the experience of other EU Agencies members of the EUAN Greening Network to help acquiring the EMAS certification. BEREC Office is currently working towards the EMAS certification with the aim to be certified by the end of 2025.

The Greening Action Plan includes proposals, targets and glide-paths for achieving a greener operation for BEREC and BEREC Office.

**Carbon neutrality**

In June 2022, the EUIPO's inter-agencies procurement procedure for a cascading framework contract (FWC) on 'Consultancy and management of greenhouse gas emissions offsets' concluded with the award decision. The expertise of the EU Agencies in reducing environmental footprint may be used, especially of those Agencies, which are more advanced in the certification process.

## Annex VII: Building policy – year 2026

The BEREC Office is situated at 14 Zigfrida Annas Meierovica boulevard, Riga, Latvia, occupying the 1<sup>st</sup> and 2<sup>nd</sup> floors of a historic building shared with other tenants. The premises are rented in accordance with the Headquarters Agreement<sup>75</sup>, which entered into force on 15 June 2021. The Headquarters Agreement governs all arrangements related to the accommodation provided for the BEREC Office in the Republic of Latvia. To further regulate the relationship between the Agency and the host Member State regarding the rented premises, the Service Level Agreement was signed on 16 June 2022 between the BEREC Office and the Government of the Republic of Latvia. This agreement outlines the specific terms and conditions for the provision of services related to the premises<sup>76</sup>.

| #            | Building Name and type | Location   | SURFACE AREA (in m²) |             |            | RENTAL CONTRACT |                          |                           |   |  | Host country (grant or support) |
|--------------|------------------------|--|----------------------|-------------|------------|-----------------|--------------------------|---------------------------|---|--|---------------------------------|
|              |                        |  | Office space         | Non- office | Total      | RENT (€/year)   | Duration of the contract | Type                      | Breakout clause Y/N                                   | Conditions attached to the breakout clause (if applicable) |                                 |
| 1            | Historical building    | 14 Zigfrida Annas Meierovica boulevard, Riga, Latvia | 1,494.50 m²          | 211.50 m²   | 1,706 m²   | 139'052,28      | Until 31/07/2028         | Premises leasing contract | Yes<br>Contract breakable with 6 months notice period | N/A  | N.A.                            |
| <b>TOTAL</b> |                        |  | 1494.50 m²           | 211.50 m²   | 1706.00 m² | 139'052.28      |                          |                           |   |  |                                 |

### Building projects submitted to the European Parliament and the Council

*Not applicable*

<sup>75</sup> [https://bereg.europa.eu/eng/document\\_register/subject\\_matter/bereg\\_office/others/9989](https://bereg.europa.eu/eng/document_register/subject_matter/bereg_office/others/9989) Headquarters Agreement between the Agency for Support for the Body of European Regulators for Electronic Communications and the Government of the Republic of Latvia entered into force on 15 June 2021, which is the date of receipt of the written notification by the Latvian side informing that their internal legal procedures had been fulfilled. According to the current agreement, the Host Member State shall make the current premises available to the BEREC Office only as long as the Agency has not found appropriate permanent office premises.

<sup>76</sup> See Articles 6 and 7 of document with ref. No Ares(2022)4676181, <https://bereg.europa.eu/en/document-categories/bereg-office/others/service-level-agreement-between-the-agency-for-support-for-the-body-of-european-regulators-for-electronic-communications-and-the-government-of-the-republic-of-latvia>

## Annex VIII: Privileges and immunities

In accordance with Article 34 of Regulation (EU) 2018/1971, the Protocol on the Privileges and Immunities of the European Union shall apply to the BEREC Office and its staff.

On 21 December 2020, in accordance with the provisions of Article 47 of the BEREC Regulation the BEREC Office and the Latvian Government signed a new Headquarters Agreement, which entered into force on 15 June 2021. The Headquarters Agreement governs all arrangements concerning the accommodation to be provided to the BEREC Office in Latvia and the facilities to be made available to the Director, members of the Management Board, the staff and the members of their families.

With the entry into force of the Headquarters Agreement, the Seat Agreement and the Memorandum of Understanding (MoU) between the BEREC Office and the Latvian Government of 2011 were terminated.

To ensure the continuity in operations and the smooth functioning of the BEREC Office, the Latvian Government and the BEREC Office signed a Service Level Agreement (SLA) on 16 June 2022 to establish working arrangements for implementation of the Headquarters Agreement and to add other elements, which existed previously only in the MoU, such as requirement to the premises and the respective costing model, or which were not sufficiently regulated before.

According to the current Headquarters Agreement the BEREC Office and the staff has the following privileges:

| Agency privileges  | Privileges granted to staff  |   |
|--|--|---|
|  | Protocol of privileges and immunities / diplomatic status  | Education / day care  |
| According to Article 2 of Regulation (EU) 2018/1971, the BEREC Office is a body of the European Union and as such, it enjoys the most extensive legal capacity accorded to legal persons under the laws of the Host Member State. It may, in particular, acquire or dispose of movable and immovable property and may be party to legal proceedings. | <p>Statutory staff of the BEREC Office, and their family members forming part of the household shall have access to all the public services provided by the Host Member State, including medical services, schooling services, child care services and rental rights without discrimination in relation to nationals of the Host Member State.</p> <p>Members of the family forming part of the household of the statutory staff and the seconded national experts of the Agency</p> | <p>There is no European School operating in Riga in 2024 The Government of Latvia aims at ensuring in the accreditation of one school as European School in Latvia, accessible by priority for the children of the staff of the BEREC Office and the members of the family forming part of the household. The accredited European School shall provide the nursery classes 1 and 2, primary and secondary school education. Until then the Government of Latvia facilitate access</p> |



| Agency privileges   | Privileges granted to staff  |  |
|---|--|--|
|   | Protocol of privileges and immunities / diplomatic status  | Education / day care   |
|   | shall enjoy access to the labour market without requiring a work permit, while in the Republic of Latvia and for the duration of the employment of the given statutory staff or seconded national expert with the Agency in the Host Member State.   | to education system and contribute to the schooling costs of the children of the staff of the BEREC Office within the limits of the budget available. At the end of 2022, the Ministry of Education and Science of Latvia started drafting a law on the Accredited European School. The BEREC Office was informed by the Local Authorities that the currently lack of budget put the establishment of a European School on hold. |
| Immunity, Inviolability and Communications  |  |  |
| The premises and buildings of the BEREC Office as well as its archives, documentation and data are inviolable.  | The BEREC Office staff shall enjoy immunity from jurisdiction as regards acts carried out by them in their official capacity, including their spoken and written statements. This immunity shall continue after cessation of their functions.  |  |
| The premises and buildings of the BEREC Office are exempt from search, requisition, confiscation, expropriation or any form of seizure.   | The Director, statutory staff and seconded national experts, as well as the members of their family forming part of their household shall be exempt from any immigration restrictions or formalities for the registration of aliens.   |  |
| The property and assets of the BEREC Office cannot be the subject of any administrative or legal measure of constraint without the authorisation of the Court of Justice of the European Union. | The Director and the members of his/her family, provided they are not Host Member State nationals or have held permanent residence status before being employed by the BEREC Office, are accorded the privileges and immunities, exemptions and facilities accorded to the heads of diplomatic missions and the members of their family in accordance with the Vienna Convention on Diplomatic Relations of 18 April 1961. |  |
| Communications and the transmission of all BEREC Office documents are treated in the same way as documents and communications of diplomatic missions.   |  |  |
| Exemption from taxes, duties, national, regional and municipal fees   |  |  |

| Agency privileges  | Privileges granted to staff  |                      |
|--|--|----------------------|
|  | Protocol of privileges and immunities / diplomatic status  | Education / day care |
| The BEREC Office is exempt from:   | BEREC Office staff are exempt from:  |                      |
| <ul style="list-style-type: none"> <li>all direct taxes and administrative fees with regard to the premises it owns or rents, its assets, revenues and other property; as well as on the supply of goods and services (including those on the consumption of gas, electricity and any type of fuel) for official use by the BEREC Office.</li> </ul>   | Salaries, wages, emoluments, SNEs' allowances, retirement, invalidity and survivor's pensions paid by the BEREC Office or by the EU are exempted from national taxes.  |                      |
| <ul style="list-style-type: none"> <li>value added tax (VAT) and excise duty with regard to purchase of all goods and services; exemption will be granted indirectly by reimbursement in accordance with a procedure established in legal acts by the Republic of Latvia. The exemption from VAT and excise duty will be applied directly by the supplier of goods and services, when the BEREC Office has a VAT and/or excise duty exemption certificate issued.</li> </ul> | The VAT included in the price of articles listed in an annex A to the Headquarters Agreement acquired by the BEREC Office staff in Latvia during his/her employment at the Agency is reimbursed to the staff provided that the receipt with eligible items is not less than 50 EUR. This rule is applicable to SNEs one year after taking up their duties, but is not applicable for nationals or permanent residents of Latvia.   |                      |
| <ul style="list-style-type: none"> <li>The BEREC Office shall be exempt from all customs duties, prohibitions and restrictions on imports and exports in respect of articles intended for its official use including vehicles and other technical equipment and spare parts.</li> </ul>  | The statutory staff and SNEs, who are not nationals or permanent residents of the Republic of Latvia, at the time of taking up the duties at the BEREC Office shall be refunded the VAT for one vehicle purchased in the Republic of Latvia and refund shall be provided once in a period of three years.  |                      |
| <ul style="list-style-type: none"> <li>Vehicles intended for the official use of the BEREC Office shall be registered under a special series similar to the registration of vehicles used by the diplomatic missions accredited to Latvia.</li> </ul>  | The statutory staff of the BEREC Office, who are not nationals or permanent residents of the Republic of Latvia, at the time of taking up the duties, have the right to import from their last country of residence or from the country of which they are nationals, free of duty and without prohibitions or restrictions, in respect of initial establishment, within two years of taking up their appointment with the BEREC Office furniture and personal effects, including motor vehicles, which shall be registered under a special series in accordance with the usual practice for staff with immunity in the Republic of Latvia. |                      |

| Agency privileges  | Privileges granted to staff   |                      |
|--|---|----------------------|
|  | Protocol of privileges and immunities / diplomatic status   | Education / day care |
| <b>Liaison Office</b>  |   |                      |
| Following the conditions set in the Headquarters Agreement, the Government of Latvia has established the Liaison Office on June 1, 2022 by signing the Service Level Agreement (SLA). SLA determines the functions of the Liaison Office and the scope of its operation. | The Liaison Office shall assist and advise the BEREC Office and its Staff, including members of their family, on issues generally related to settling in and staying in Latvia. It shall provide support on general administrative matters such as, but not limited to, assisting with VAT reimbursement applications, complying with the social security obligations, assisting with obtaining Special ID cards from the MFA and registering motor vehicle. On the request of the BEREC Office, the Liaison Office can, inter alia, facilitate access to the job market, to the day-care facilities, to the schools and universities, to banking and insurance. It also can assist in searches for premises and facilities, housing and real estate brokerage, and telecommunications. More extensive list of functions of the Liaison Office are laid down in Annex 1 of the SLA. |                      |

## **Annex IX: Evaluations**

According to the provisions of Article 48 'Evaluation' of the new BEREC Regulation, by 21 December 2023, and every five years thereafter, the legislator has requested the European Commission (EC) to carry out an evaluation in compliance with the EC guidelines and to assess both BEREC's and the BEREC Office's performance in relation to their objectives, mandate, tasks and location.

Since this Regulation confers new tasks on BEREC and the BEREC Office, and other Union legal acts may confer additional tasks to them, the EC should carry out a regular evaluation of the operation of BEREC and the BEREC Office and the effectiveness of their institutional structure in a changing digital environment. If, as the outcome of that evaluation, the EC finds that the institutional structure is not suited to the carrying out BEREC's and the BEREC Office's tasks, and, in particular, to ensure the consistent implementation of the regulatory framework for electronic communications, it should explore all possible options for improving that structure

The evaluation shall, in particular, address the possible need to modify the structure or mandate of BEREC and the BEREC Office, and the financial implications of any such modification.

Where the EC considers that the continuation of BEREC or the BEREC Office is no longer justified with regard to its assigned objectives, mandate and tasks, it may propose to the legislator to amend the BEREC Regulation or to repeal it.

The EC shall report to the European Parliament (EP), the Council and the BEREC Office Management Board (MB) on the findings of its evaluation and shall make those findings public.

As stated above, the first evaluation is due by 21 December 2023 and consequently there have been no evaluation reports submitted by the EC to the EP, the Council and MB yet.

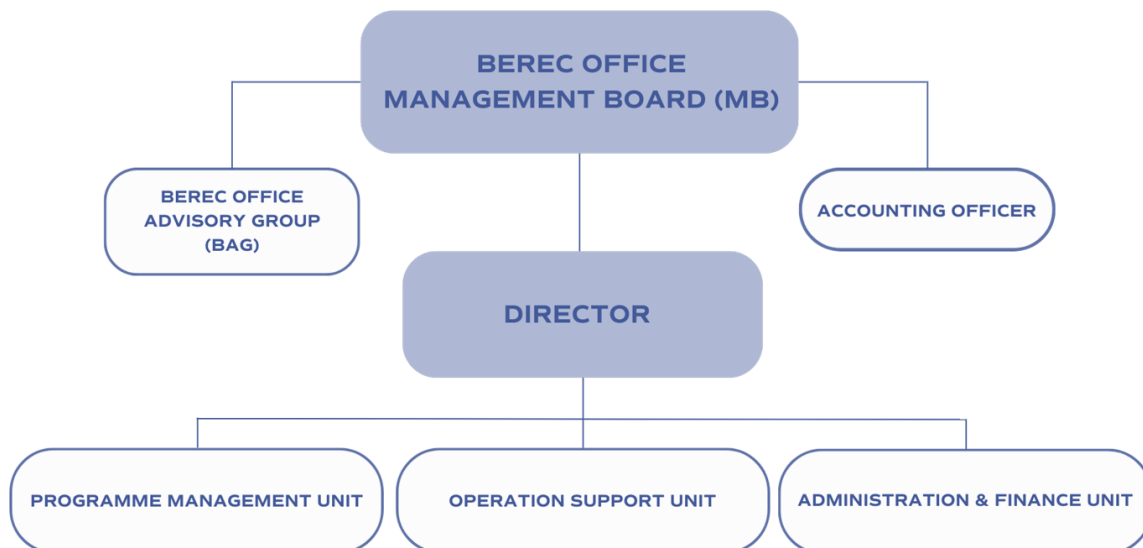
# Annex X: Strategy for the organisational management and internal control systems

## 1. Strategy for organisational management

The BEREC Office internal organisational structure shall contain:

6. 1 senior management level (1 Director);
7. 1 middle management level (3 Heads of Unit);
8. Staff (organised in teams).

The current internal structure of the Agency is based on three Units – Programme Management, Operation Support and Administration and Finance, as follows:



The Director, who is the BEREC Office authorising officer shall put in place the organisational structure and the internal control systems suited to the performance of the duties of authorising officer, in accordance with the minimum standards or principles adopted by the Management Board on the basis of the Internal Control Framework laid down by the Commission for its own departments and having due regard to the risks associated with the management environment and the nature of the actions financed.

The establishment of such structure and systems shall be supported by a comprehensive risk analysis, which takes into account their cost-effectiveness and performance considerations.

The authorising officer may establish within his or her departments an expertise and advice function to help him or her control the risks involved in his or her activities.

Currently the BEREC Office has no such internal posts and therefore will search for opportunities for the externalisation of this function to the EC services or another body of the EU. As a temporary measure, before the conclusion of such agreements, the function will be performed by an interim worker or another appropriate arrangement available on the market.

## 2. Internal control strategy

Following the new Internal Control Framework of the BEREC Office and requirement in the BEREC Offices Financial regulation<sup>77</sup> Article 32 subparagraph 1 there is an obligation for BEREC Office to have an Internal Control Strategy. This Strategy should ensure proper implementation and functioning of Internal Control Framework of the BEREC Office.

The Internal Control System of the BEREC Office is based on five internal control components:

- the control environment,
- risk assessment,
- control activities,
- information and communication and
- monitoring activities.

They are the building blocks that underpin the framework's structure and support the Agency in its efforts to achieve its objectives. The five components are interrelated and must be present and effective at all levels of the organisation for internal control over operations to be considered effective.

Each component consists of several principles. Working with these principles helps to provide reasonable assurance that the BEREC Office's objectives have been met. The principles specify the actions required for internal control to be effective.

The following principles shall be applied by the management in the Internal Control programme:

|             |   |
|-------------|---|
| Principle 1 | The BEREC Office demonstrates a commitment to integrity and ethical values  |
| Principle 2 | The Management exercises oversight of the development and performance of internal control   |
| Principle 3 | The Management establishes structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives |
| Principle 4 | The BEREC Office demonstrates a commitment to attract, develop and retain competent individuals in alignment with objectives          |

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<sup>77</sup> Decision No MB/2019/13 of the Management Board of the BEREC Office on the financial regulation applicable to the BEREC Office  
[https://berec.europa.eu/eng/document\\_register/subject\\_matter/berec\\_office/decisions\\_of\\_the\\_management\\_board/8699-decision-no-mb201913-of-the-management-board-of-the-berec-office-on-the-financial-regulation-applicable-to-the-berec-office](https://berec.europa.eu/eng/document_register/subject_matter/berec_office/decisions_of_the_management_board/8699-decision-no-mb201913-of-the-management-board-of-the-berec-office-on-the-financial-regulation-applicable-to-the-berec-office)

|              |  |
|--------------|--|
| Principle 5  | The BEREC Office holds individuals accountable for their internal control responsibilities in the pursuit of objectives  |
| Principle 6  | The BEREC Office specifies objectives with sufficient clarity to enable the identification and assessment of risks relating to objectives  |
| Principle 7  | The BEREC Office identifies risks to the achievement of its objectives across the organisation and analyses risks as a basis for determining how the risks should be managed                           |
| Principle 8  | The BEREC Office considers the potential for fraud in assessing risks to the achievement of objectives   |
| Principle 9  | The BEREC Office identifies and assesses changes that could significantly impact the internal control system   |
| Principle 10 | The BEREC Office selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels  |
| Principle 11 | The BEREC Office selects and develops general control activities over technology to support the achievement of objectives  |
| Principle 12 | The BEREC Office deploys control activities through corporate policies that establish what is expected and in procedures that put the policies into action   |
| Principle 13 | The BEREC Office obtains or generates and uses relevant quality information to support the functioning of internal control   |
| Principle 14 | The BEREC Office internally communicates information, including objectives and responsibilities for internal control, necessary to support the functioning of internal control                         |
| Principle 15 | The BEREC Office communicates with external parties about matters affecting the functioning of internal control  |
| Principle 16 | The BEREC Office selects, develops, and performs ongoing and/or separate assessments to ascertain whether the components of internal control are present and functioning                               |
| Principle 17 | The BEREC Office assesses and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including the senior management, as appropriate |

The characteristics of each principle shall be based on already existing characteristics set out in Internal Control Framework and on those of the Commission, but shall be defined in such a way as to take into account the specific governance arrangements and the specific situation of the BEREC Office.

There is no requirement for the BEREC Office to assess whether each individual characteristic is in place. The characteristics shall be defined to assist management in implementing internal control procedures and in assessing whether the principles are present and functioning.

For the purposes of the implementation of the budget, internal control shall be applied at all levels of management and shall be designed to provide reasonable assurance of achieving effectiveness, efficiency and economy of operations, reliability of reporting, safeguarding of assets and information, prevention, detection, correction and follow-up of fraud and irregularities and adequate management of the risks relating to the legality and regularity of the underlying transactions, taking into account the character of programmes and the nature of the payments concerned.

The effectiveness of functioning of the internal control system will be evaluated each year.



## **Annex XI: Plan for grant, contribution or service-level agreements**

- This Annex does not apply to the Agency.

## **Annex XII: Strategy for cooperation with third countries and/or international organisations**

In light of market and technological developments, which often entail an increased cross-border dimension, as well as increasing convergence between the sectors providing electronic communications services, and the horizontal dimension of regulatory issues related to their development BEREC and the BEREC Office may cooperate with competent Union bodies, offices, agencies and advisory groups, with competent authorities of third countries and with international organisations in order to achieve the objectives set out in BEREC Regulation and carry out its tasks.

The BEREC Office will provide necessary resources and assistance to BEREC in the implementation of BEREC's Medium-Term Strategy for the period 2026-2030<sup>78</sup>, including establishment and implementation of working arrangements with regulatory authorities of third countries, regional regulatory networks, international organisations, institutional groups, and other stakeholders.

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<sup>78</sup> BEREC is developing its new Strategy with a view to finalising it and adopting by the end of 2025.