



Audit Report

23/05

Funds spent on the basic registers system and selected information systems that acquire, collect and provide data on the basis of special regulations

The audit was included in the audit plan of the Supreme Audit Office (hereinafter the “SAO”) for 2023 under No 23/05. The audit was headed and the Audit Report drawn up by the SAO Member Ing. Josef Kubíček.

The **objective of the audit** was to verify whether the selected organisational units of the state had spent funds on the basic registers system (basic registers hereinafter also as “BR”) and selected information systems (hereinafter also “IS”) that acquired, collected and provided data on the basis of special regulations effectively, economically and in accordance with legal regulations.

Audited entities:

Ministry of the Interior (hereinafter the “Moi”),
Czech Statistical Office, Prague (hereinafter the “CSO”),
Czech Office for Surveying, Mapping and Cadastre, Prague (hereinafter the “COSMC”),
National Registers Authority, Prague (hereinafter the “NRA”),
Digital and Information Agency, Prague (hereinafter the “DIA”).

The audit was conducted with the audited entities between February 2023 and December 2023.

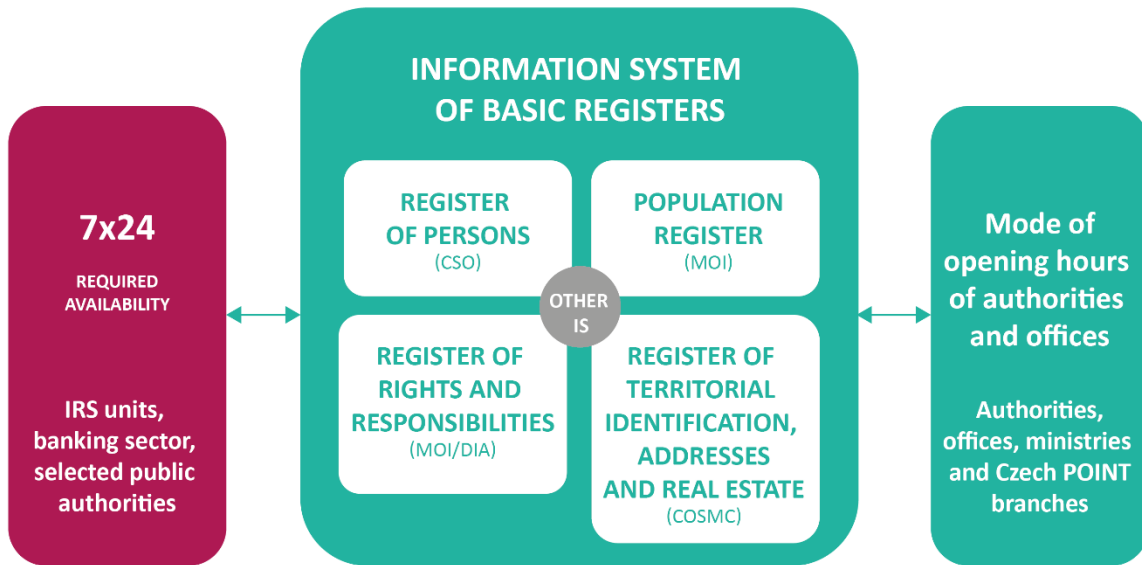
The **period audited** was from 2015 to 2022, and the preceding and subsequent periods where materially relevant.

The **SAO Board** at its 7th meeting held on 20 May 2024

approved by Resolution No 4/VII/2024

the **Audit Report** as follows:

Basic registers system



CZK 2.46 billion

Total cost of the basic registers system in 2015-2022

8 billion

Total number of transactions carried out by the basic registers

2,923 agenda IS

out of approximately 5 thousand IS using the reference data of the BR create their local copies

4 out of 5

registers under vendor lock-in¹

More than 4 years

after the set deadline, the availability of the basic registers system in 7x24 mode is not ensured

¹ Dependence on a specific provider.

I. Summary and Evaluation

1.1 The SAO audited whether the state funds related to the activities of the state administration authorities in the field of basic registers were spent effectively, economically and in accordance with legal regulations. The supplies and services selected for the audit related to the building, operation, development and use of information systems in the field of basic registers.

1.2 There is a significantly growing demand from citizens and private entities for continuous digital public administration services. At the same time, digitalisation is leading to changes that place increased demands on the use of data from the BR system. On the basis of this need, the MoI prepared a document entitled *Basic Registers 2.0 – Target Concept* in 2018, in which it presented the transformation of basic registers into a new form (hereinafter the “BR 2.0 Concept”). Within the framework of that document, it defined the main implementation steps for the individual administrators of the basic registers and set fixed deadlines for implementation. Since 2018, the individual administrators of the basic registers have been spending funds on the transformation of the basic registers in an effort to fulfil the BR 2.0 Concept.

1.3 During the audit, the SAO found that the current concept and mode of operation of the basic registers system did not meet the increasing requirements for the level of digitalisation of public administration. The SAO assessed part of the funds spent on the operation and transformation of the basic registers system as being spent in an ineffective and uneconomical manner.

1.4 The MoI and the NRA did not fulfil the BR 2.0 Concept. In particular, they did not ensure the renewal of the basic registers infrastructure and the non-stop operation of the basic registers system in 7x24 mode². Both implementation steps were to be completed by the end of 2019. Thus, there are still outages of the BR system and administrators of agenda information systems have been creating local copies of reference data from the basic registers system to ensure the provision of public administration services to clients. The procedure of the MoI and the NRA led, among other things, to the fact that the COSMC and the CSO spent funds related to the introduction of the non-stop operation in an ineffective manner until the date of the audit completion.

1.5 Since their inception, the operation of the basic registers system had been provided by the MoI, the NRA, the CSO and the COSMC on the basis of repeated contracts with the original providers. The SAO found that the MoI, the NRA and the CSO had awarded public contracts in a restricted competition procedure or without any tender procedure at all, and became dependent on a specific provider (i.e., the so-called vendor lock-in situation). The SAO assessed this long-standing situation as a risk to the cost-effectiveness of the funds spent annually on the operation of the BR system. The average annual expenditure on the operation of the BR system was CZK 220 million in the audited period of 2015-2023.

1.6 The SAO verified that despite the above-mentioned shortcomings and limitations, the basic registers system had fulfilled its role as a basic data source for public administration. In the years 2015-2023, it facilitated approximately 8 billion transactions

² System availability 24 hours a day, 7 days a week.

and was used, for example, as the main source of data for the census of population and housing conducted by the CSO in 2021.

1.7 The overall evaluation is based, in particular, on the following findings:

- a) In 2018, the MoI developed a target concept for the development of basic registers (the BR 2.0 Concept). In the BR 2.0 Concept, the MoI set implementation steps aimed at transforming the BR system into a new form, with completion deadlines from 2019 to 2023. During the audited period, the individual administrators of the BR spent funds to implement this concept. The transformation of the BR system according to the BR 2.0 Concept did not take place by the end of 2023. Despite the expenditure of funds in the amount of CZK 67.9 million, the MoI and the NRA did not completely renew³ the infrastructure of those parts of the BR system that fell under their administration. At the same time, the MoI spent funds of approximately CZK 4.4 million on the purchase of components for the renewal of the BR system uneconomically.
- b) In the audited period, the CSO and the COSMC spent tens of millions of Czech crowns of funds on the modification of the *Register of Persons* (hereinafter the “ROS”) and the *Register of Territorial Identification, Addresses and Real Estate* (hereinafter the “RÚIAN”) to ensure their non-stop operation in the 7x24 mode. The MoI and the NRA did not make the necessary adjustments to the parts of the BR managed by them, in particular of the *Information System of Basic Registers* (hereinafter the “ISZR”); thus, the non-stop operation of the entire BR system in the 7x24 mode was not achieved. By this procedure, the MoI and the NRA caused the funds spent by the CSO and the COSMC on the adjustments to the ROS and RÚIAN to be assessed by the SAO as having been spent ineffectively at the time of the completion of the audit.
- c) Failure to introduce the non-stop operation of the BR system is one of the possible causes of the situation where 2,923 out of 5,118 agenda information systems⁴ (hereinafter also “AIS”) create local copies of reference data maintained in the BR system when performing state administration. By copying reference data, they become only “information data”, which may not correspond to the actual (current) situation and thus lack the validity of reference data for the performance of public administration agendas. The functionalities of the remaining AIS, which use data from the BR directly, are also being limited (e.g., unavailability of the *National Identification Authority* and the information systems that use it).
- d) Since the launch of the BR system operation⁵, all registers have been operated and developed by the same providers. With the exception of the COSMC, the administrators of the BR ensured their operation and development through contracts concluded on the basis of public procurement without a tender procedure or through a negotiated procedure without prior publication, so the price determination did not take place in an arm’s length manner. In addition, the NRA and the CSO concluded some contracts without objective and transparent price verification. The operation of the BR was thus still ensured

³ In the sense of infrastructure renewal as the main implementation step mentioned in the BR 2.0 Concept.

⁴ An agenda information system is a public administration information system used for the execution of an agenda, the use of electronic forms or electronic identification. In the present case, it is an AIS drawing data from the BR.

⁵ The BR system was developed as an output of a project implemented between 2008 and 2012. The total value of the acquisition amounted to almost CZK 1.8 billion.

in 2023 according to the parameters set in 2012. At the same time, the NRA did not monitor and evaluate the actual utilisation of the hardware infrastructure (hereinafter also “HW”) of the ISZR. The total funds spent by the BR administrators on the BR system in the audited period amounted to CZK 2.46 billion, of which CZK 1.76 billion was spent on operation and CZK 697 million on development and renewal.

- e) The BR system was used, inter alia, as one of the main data sources for the census of population and housing in 2021 (hereinafter also the “2021 Census”); the data was, in particular, the data recorded in the *Population Register* (hereinafter the “ROB”) and data from the *Population Registration Information System* and the *Foreigners’ Agenda Information System* administered by the Mol. The CSO collected 83.8% of the census forms through an online form solution. In contrast, 16.2% of the forms were secured by the Czech Post’s field survey. In total, the CSO spent approximately CZK 1.815 billion on the 2021 Census. This amount also includes a contractual remuneration of approximately CZK 1 billion for the Czech Post, for which the final settlement had not been made by the end of the audit.

II. Information on the Audited Area

2.1 The BR system represents a key element in the electronisation of public administration. The content, scope and the basic principles of the functioning of the BR are laid down by Act No 111/2009 Coll.⁶ (hereinafter the “Basic Registers Act”). The BR were developed as part of several separate projects co-funded by the European Union (hereinafter the “EU”) and entered into real operation on 1 July 2012.

2.2 The BR are a source of reference data on citizens, legal entities, real estate, etc. There is a general legal and procedural premise that reference data is presumed to be correct unless proven otherwise or unless the data is called into question by the competent editor. It is therefore true that the public administration must act on the basis of that reference data, and it is also true that if the public administration acts on the basis of that reference data, there can be no maladministration due to a discrepancy with the facts.

2.3 The data recorded in the BR is used as administrative data sources for public authorities, private users and electronic identification of residents.

2.4 The BR form the backbone of the interconnected public administration data pool, including the pseudonymisation mechanism⁷ and linking of identifications from individual agendas. The basic function of the interconnected data pool is to implement the principles of “data once only” and “data circulates, not people”⁸ in the common practice of the public administration of the Czech Republic.

⁶ Act No 111/2009 Coll., on basic registers.

⁷ The processing of data in such a manner that the data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the data is not attributed to an identified or identifiable private individual.

⁸ Source: https://archi.gov.cz/nap:propojeny_datovy_fond and the *National Architectural Plan* as part of the *Information Concept of the Czech Republic* pursuant to Section 5a(1) of Act No 365/2000 Coll., on public administration information systems.

2.5 By Resolution of the Government of the Czech Republic No 390 of 25 May 2015⁹, the BR were designated as elements of the critical information infrastructure of the state.

2.6 The BR system consists, among other things, of the following application components¹⁰:

- *Population Register* – includes citizens of the Czech Republic and a specified group of foreigners and other private individuals;
- *Register of Legal Entities, Private Individual Entrepreneurs and Public Authorities*;
- *Register of Territorial Identification, Addresses and Real Estate*;
- *Register of Rights and Responsibilities* (hereinafter the “RPP”) – serves as a source of data for the ISZR in controlling user access to data in the BR and AIS, includes agendas, public authorities, private data users and certain rights and responsibilities;
- *Information System of Basic Registers* – provides comprehensive services defined in the “eGON Service Catalogue”¹¹. It provides these services covering the BR to all entities with respect to their current authorisation as specified in the RPP. It also ensures the implementation of the links between the individual BR, between the BR and the AIS and between the individual AIS.

2.7 The roles of the individual parts of the BR system are, inter alia, as follows:

- The individual BR (ROB, ROS, RÚIAN, RPP) are used to store and publish reference data;
- The ISZR serves as a reference interface on which reference data is provided to users. It does not check the correctness of the transmitted data or store it. It stores logs of data usage in the BR:
 - On the external interface, eGON provides services to the BR. This interface is a reference interface.
 - On the internal interface, the individual registers provide services that can only be used by the ISZR. This interface is not a reference interface.

2.8 With the end of the life cycle of the technologies deployed in the BR system, the strategic document BR 2.0 Concept, which the MoI submitted to the Government of the Czech Republic, was crucial for its renewal and development after 2018. The Government took note of the document by its Resolution No 650 of 10 October 2018¹² (hereinafter “Government Resolution No 650/2018”) and ordered the Minister of the Interior and the co-responsible heads of central administrative authorities to implement the relevant measures.

2.9 In particular, the BR 2.0 Concept contains a definition of the future state of the BR and the main implementation steps to achieve it. The fundamental operational change was to be

⁹ Resolution of the Government of the Czech Republic No 390 of 25 May 2015, on the 2nd update of the List of Critical Infrastructure Elements operated by an organisational unit of the state.

¹⁰ Some registers also include editing agenda information systems.

¹¹ The eGON Service Catalogue is a list of ISZR services. The information provided in the eGON Service Catalogue is intended for AIS implementers (programmers) to prepare the agenda information systems for communication with basic registers or other AIS.

¹² Resolution of the Government of the Czech Republic No 650 of 10 October 2018 *on the Report on the Implementation of Government Resolution No 411 of 31 May 2017, on the Report on the need to launch a transformation project addressing the renewal and system development of basic registers and related systems.*

that the BR would no longer serve only for internal information sharing within the public administration, but with the introduction of guaranteed electronic identification for self-service public administration agendas also directly to citizens, non-stop regardless of the working hours of the relevant offices and authorities¹³. The concept thus defined the need to ensure and guarantee the availability of the BR system in the 7x24 mode by December 2019.

2.10 The BR 2.0 Concept lists twelve main implementation steps, identifying the following as critical implementation steps/areas:

- ensuring non-stop operation,
- promoting interoperability within the EU,
- renewal of the BR infrastructure / shared platform,
- strengthening the possibility of data control by register administrators and creating administrative tools for the BR administrators.

Ministry of the Interior

2.11 According to Act of the Czech National Council No 2/1969 Coll.¹⁴ (hereinafter the “Competence Act”), the Mol is the central state administration authority for internal affairs and, before the establishment of the DIA¹⁵, it was also responsible for the area of public administration information systems. Pursuant to Act No 219/2000 Coll.¹⁶ (hereinafter the “Property Act”), the Mol is an organisational unit of the state, pursuant to Act No 218/2000 Coll.¹⁷ (hereinafter the “Budgetary Rules”), it is the administrator of budget chapter 314 and, according to the provisions of Section 1(3) of Act No 563/1991 Coll.¹⁸ (hereinafter the “Act on Accounting”), it is a selected accounting entity. According to the Basic Registers Act, the Mol is the administrator of the ROB. The Mol was the administrator of the RPP until 31 March 2023.

National Registers Authority

2.12 The NRA was established on 1 July 2010 by the Basic Registers Act. According to the Basic Registers Act, the NRA was an administrative authority subordinated to the Mol. The NRA was an accounting entity and was part of budget chapter 314 of the Mol. According to the Basic Registers Act, the NRA was the administrator of the ISZR until 31 March 2023. The NRA was abolished as of 1 January 2024.

¹³ The original concept envisaged the use of the BR for the purposes of the authorities and according to their working hours, i.e., in a 5x8 mode.

¹⁴ Act of the Czech National Council No 2/1969 Coll., on the establishment of ministries and other central state administration authorities of the Czech Republic.

¹⁵ In the sense of the transfer of the obligations of the NRA to the DIA as of 1 January 2023 pursuant to Act No 471/2022 Coll., amending Act No 12/2020 Coll., on the right to digital services and on amendments to certain acts, as amended, and other related acts.

¹⁶ Act No 219/2000 Coll., on the property of the Czech Republic and the representation of the Czech Republic in legal relations.

¹⁷ Act No 218/2000 Coll., on budgetary rules and on amendments to certain related acts (the Budgetary Rules).

¹⁸ Act No 563/1991 Coll., on accounting.

Digital and Information Agency

2.13 The DIA is the central administrative authority for electronic identification and trust services and for public administration information systems. It was established as of 1 January 2023 by Act No 471/2022 Coll.¹⁹, is an accounting entity and the administrator of budget chapter 364. The DIA has been the administrator of the ISZR and RPP since 1 April 2023.

Czech Statistical Office

2.14 The CSO is a central administrative authority whose competence is regulated, in particular, by Act No 89/1995 Coll.²⁰ According to the Budgetary Rules, the CSO is the administrator of budget chapter 345 and is an accounting entity according to the Act on Accounting. According to the Basic Registers Act, the CSO is the administrator of the ROS.

2.15 The CSO is also the administrator of the *Census Information System* (hereinafter the “CENZIS”), which served as the main tool for facilitating data collection in the 2021 Census.

Czech Office for Surveying, Mapping and Cadastre

2.16 The COSMC is a central administrative authority whose competence is regulated, in particular, by Act No 359/1992 Coll.²¹ The COSMC was established as of 1 January 1993 as the central administrative authority for land surveying and the Cadastre of the Czech Republic. The COSMC is the administrator of budget chapter 346. According to the Basic Registers Act, the COSMC is the administrator of the RÚIAN.

III. Scope of the Audit

3.1 The subject-matter of the audit was the funds spent on the BR system and selected information systems that acquired, collected and provided data on the basis of special regulations. The objective of the audit was to verify whether the selected organisational units of the state had spent funds on the BR system and selected information systems that acquired, collected and provided data on the basis of special regulations effectively, economically and in accordance with legal regulations. The audited period was from 2015 to 2022; where relevant, the preceding period and the period up to the end of the audit were also scrutinised.

3.2 In assessing economy, the SAO used the definition set out in Section 2(m) of Act No 320/2001 Coll.²² (hereinafter the “Act on Financial Control”). The use of state funds is considered economical if it ensures the performance of the set tasks with the least possible expenditure of such funds while ensuring the adequate quality of the tasks performed. The economy was assessed in relation to the defined need for the acquisition of assets in terms of qualitative requirements and their subsequent use for the performance of the functions of the state and for the performance of specified activities²³. During the audit, the costs of the individual operational parameters of the BR and their evolution over time were also

¹⁹ Act No 471/2022 Coll., amending Act No 12/2020 Coll., on the right to digital services and on amendments to certain acts, as amended, and other related acts.

²⁰ Act No 89/1995 Coll., on the state statistical service.

²¹ Act of the Czech National Council No 359/1992 Coll., on land surveying and cadastral authorities.

²² Act No 320/2001 Coll., on financial control in public administration and on amendments to certain acts (the Act on Financial Control).

²³ Section 14(1) of Act No 219/2000 Coll.

compared. Subsequently, these values were compared between the different BR administrators and it was examined whether and why they differed from each other.

3.3 In assessing effectiveness, the SAO used the definition set out in Section 2(o) of the Act on Financial Control. The use of state funds is considered effective if it ensures an optimal rate of achievement of objectives in the fulfilment of the set tasks. For the purposes of the SAO audit, funds were considered effective if they had been spent, inter alia, in accordance with the target situation defined by the individual implementation steps of the BR 2.0 Concept²⁴. The effectiveness was also assessed in relation to assets used to perform the functions of the state and to carry out specified activities.¹⁶

3.4 The complete and correct filling of data into the RPP is a basic precondition for sharing and accessing PA data, and therefore for ensuring the sharing of data on citizens already registered. Incomplete or incorrect indication of the identifier of individual data within the registration of agendas in the RPP by their administrators leads to limitations of the functionalities of the system used to share data contained in the public administration information systems (hereinafter also "ISVS"). The funds spent on the acquisition and operation of the RPP are thus partially ineffective.

3.5 The SAO also examined whether the MoI, the CSO, the COSMC, the NRA and the DIA had acted in accordance with the relevant legal regulations when awarding public contracts (hereinafter also "PC").

3.6 The total audited volume of funds spent by the MoI, the CSO, the COSMC, the NRA and the DIA in connection with the operation, renewal and development of the BR in 2015-2022 amounted to approximately CZK 2.46 billion (CZK 1.76 billion on operation, CZK 0.7 billion on development and renewal).

Note: The legal regulations indicated in this Audit Report are applied in their wording effective for the audited period. Funds are inclusive of VAT unless otherwise stated.

IV. Detailed Findings of the Audit

Document "*Basic Registers 2.0 – Target Concept*" and its implementation

4.1 The BR 2.0 Concept defined the requirements for the technological development of BR in order to ensure safe, efficient, transparent and trustworthy provision of public administration services through eGovernment. The execution of all the implementation steps of the BR 2.0 Concept was expected to require a total cost of CZK 322 million in 2018-2020. The following table shows the most financially significant areas/implementation steps for which the need for implementation in the "critical" category was also registered.

²⁴ In the sense of building a basic data pool of data on key entities and also to enable truly efficient linking of the data pool on the basis of that data.

Table 1: Critical implementation steps

Main implementation step	Cost estimate	Estimated date of completion
Renewal of the BR infrastructure / shared platform	CZK 147.5 million	12/2019
Ensuring non-stop operation of the BR	CZK 42.5 million	12/2019
Promoting interoperability within the EU (taking into account the role of the BR of the Czech Republic within the interoperable public administration of the EU)	CZK 27.5 million	1/2020
Strengthening the possibility of data control by register administrators and creating administrative tools for the BR administrators	CZK 25 million	12/2021

Source: BR 2.0 Concept; table prepared by the SAO.

The SAO primarily dealt with issues in the area of “renewal of the BR infrastructure / shared platform” and “ensuring non-stop operation of the BR”.

Even after 5 years since the approval of the BR 2.0 Concept, the Mol and the NRA had not managed to fully replace the ageing infrastructure of the parts of the BR system administered by them

4.2 By the end of 2022, the Mol and the NRA had not managed to renew the infrastructure of the parts of the BR system administered by them, as they had procured only part of the necessary components. The BR 2.0 Concept set a deadline of December 2019 for this implementation step. In some cases, the renewal and development of critical information infrastructure elements had not been completed by the time the SAO audit was completed. The Mol thus failed to fulfil the task given by Government Resolution No 650/2018 and thus did not proceed in accordance with the Competence Act.

4.3 The Mol failed to implement the renewal in cooperation with the NRA, even though its budget for the basic registers was increased during the audited period by, among other things, additional resources in the amount of CZK 140 million, allocated on the basis of Government Resolution No 650/2018. Although the Mol, according to the submission report to Government Resolution No 650/2018, requested the above increase for the period of 2018-2020, less than half of these funds, namely CZK 67,940,476, had been used by 2022²⁵.

4.4 On the part of the CSO, the ROS infrastructure was renewed. In this context, the CSO acquired SW and HW at a total cost of CZK 157.3 million, of which tangible fixed assets for CZK 50.7 million and software for CZK 106.6 million. In terms of infrastructure, the RÚIAN uses a HW solution that is shared with other IS administered by the COSMC. This HW solution was continuously renewed and developed.

The Mol uneconomically spent almost half of the funds paid for the provision of extended warranty support services in the context of the renewal of the BR infrastructure

4.5 In the course of the audited period, the Mol concluded a total of 5 contracts for the renewal of components of the ageing infrastructure of the BR on the basis of open above-the-

²⁵ In 2022, Resolution of the Government of the Czech Republic No 828 of 26 September 2022 approved a further increase in the budget for the basic registers system for 2023 by CZK 300 million intended for one-off renewal of the infrastructure of the basic registers elements owned by the Mol and for 2024 and further years by CZK 45 million for operating expenditure intended to ensure support of subordinate HW and SW components.

threshold PC. The subject-matter of the concluded contracts included the provision of extended warranty support services for the delivered components.

4.6 The SAO found that the MoI had paid flat-rate sums to the providers for the provision of extended warranty support services from the date of acceptance of the components by the MoI or the representative of the NRA. The contracts for the actual implementation of the components were concluded by the MoI only after a considerable time lag. In the period from the takeover of the components until the time when the MoI started their implementation in the ROB, RPP and ISZR environments, it did not and could not use the extended warranty support services provided. This procedure resulted in uneconomical spending of funds worth approximately CZK 4.4 million of the total amount of CZK 9.1 million paid by the MoI to providers for the provision of extended warranty support services. By the aforementioned conduct, the MoI violated Section 45(2) of the Budgetary Rules. The SAO assessed the above-mentioned procedure as indicating a breach of the budgetary discipline.

The BR system is not ready for non-stop operation in the 7x24 mode; there are no modifications to the ISZR

4.7 Ensuring the 7x24 non-stop operation of the BR is only possible after modification of all key parts of the BR system, especially the ISZR as a system ensuring the implementation of links between individual BR and between the BR and AIS. The SAO found that the MoI and the NRA had not ensured that the parts of the BR system administered by them (ROB, RPP and especially ISZR) were operated non-stop by the end of the audited period. In the case of the ISZR it is possible to switch to a 7x24 non-stop operation only with a change of the BR architecture; this step had not occurred by the end of the audit. Failure of the MoI and the NRA, especially in the case of the ISZR, to fulfil the area/implementation step no 1 of the BR 2.0 Concept (ensuring non-stop operation) results in the ineffectiveness of the funds spent by the other administrators to ensure non-stop operation of the BR under their administration until the non-stop mode is achieved. The MoI thus failed to fulfil the task given by Government Resolution No 650/2018 and thus did not proceed in accordance with the Competence Act.

4.8 The CSO and the COSMC implemented steps for the transition to the 7x24 non-stop operation. The COSMC already implemented steps to ensure non-stop operation before 2018. On the CSO side, this covered modifications to the ROS to enable operation in active-active mode²⁶, and these modifications were accepted by the CSO on 10 December 2020. Other change requests were still in progress at the time of the audit completion. The CSO estimated the costs for the period of 2018-2020 in the amount of CZK 26 million in connection with the introduction of non-stop operation. The individual changes on the part of the CSO and the COSMC were made as part of comprehensive development requirements.

4.9 An overview of the actual period of unavailability of the BR in 2020-2022 was compiled by the SAO based on documentation of planned downtime and related reported outages. Their values are shown in the following table.

²⁶ Active-active mode is a technical term used in IT that, in simplified form, refers to a configuration where multiple components (e.g., servers, databases, etc.) in a system are active and can process requests.

Table 2: Actual period of unavailability of individual parts of the BR in 2020-2022

	2020	2021	2022
	Actual period of unavailability (planned downtime)		
RPP	27 h 10 min	25 h 28 min	8 h 10 min
ROS	26 h 22 min	1 h 24 min	17 h 20 min
ISZR	0 h 0 min	4 h 30 min	5 h 2 min
ROB	5 h 35 min	0 h 8 min	0 h 0 min

Source: NRA information; table prepared by the SAO.

Note: In the case of the RÚIAN, no actual unavailability was recorded during the planned downtime.

Almost 3,000 agenda information systems make copies of the reference data held in the BR for their local databases

4.10 Public administration authorities in the Czech Republic operate AIS which provide services of both continuous online access to data stored in them and in offline mode. In cases where that data includes reference data from the BR, some AIS copy the reference data into their local databases. Copying data from the BR was also recommended by the NRA in the handbook for the administrators of AIS connected to the BR. According to the NRA data for 2023, a total of 2,923 of the nearly 5,000 AIS connected to the BR create their own local copies of data²⁷.

4.11 One of the reasons for the situation where almost 3,000 AIS create local data by copying from the BR may be that in the audited period it was not possible to ensure the non-stop operation of the BR system, thus, for example, in the case of database and data storage maintenance, there were BR system outages lasting several hours. This can have a significant impact on the delivery of services by individual public administration authorities to their clients. Thus, public administration authorities still rely on their local data, which is available to them even in the event of an outage or downtime of the ISZR. Data from the BR (e.g., data on citizens) is thus still stored and updated in local databases.

Operation of basic registers

4.12 The issue of the operation of the BR (the operation included small development services) is primarily addressed to the individual BR administrators, as they determine the purpose and means of information processing and are responsible for the operation and security of the BR. The BR administrator may delegate the operation to the operator. The role of the BR operator was provided by the CSO²⁸ and the COSMC through contracts concluded with providers. In the case of the BR administered by the MoI, the role of the operator of the ROB, RPP and ISZR was provided by the NRA, which used the services of other providers. An

²⁷ When communicating with the ISZR, a copy of the reference data is obtained with a confirmation of the execution of the service that provided the data. Once this copy of the reference data is stored in the agenda IS OVM or other ISVS, the reference data acquires the status of information data. The amount of information data on data subjects stored in agenda IS can be much broader, as this is required by the processes of public authorities dealing with different life situations of citizens and companies.

²⁸ Section 7 of the Basic Registers Act stipulated, until 31 March 2023, that the NRA shall also ensure the operation of the ROS. Unlike the other BR mentioned in that provision, the NRA did not conclude any operating contract with a provider for the operation of the ROS during the audited period. Thus, the provision of the ROS operation by the NRA consisted only in the provision of housing, service desk, connectivity and change management services, based on an agreement concluded with the CSO.

overview of the funds spent by the audited entities on the operation, development and renewal (development is included in the renewal) of the individual parts of the BR for the audited period is contained in the following table.

Table 3: Funds spent on the operation, development and renewal of individual parts of the basic registers system (in CZK thousand)

Year	ROS		RÚIAN		ROB		RPP		ISZR	
	Operation	Renewal	Operation	Renewal	Operation	Renewal	Operation	Renewal	Operation	Renewal
2015	28,475	561	37,904	24,795	38,656	0	48,596	0	47,223	0
2016	29,787	4,252	17,599	25,986	38,655	0	54,619	15,741	48,487	0
2017	26,314	28,121	30,056	22,766	45,200	0	69,006	23,257	76,269	0
2018	31,404	19,179	25,144	29,728	34,093	0	52,561	0	72,865	0
2019	37,678	74,400	27,330	40,668	39,123	0	45,154	0	61,016	0
2020	35,931	19,943	27,590	44,569	36,006	0	48,274	839	80,979	0
2021	41,040	7,183	26,958	37,372	45,203	27,671	56,355	50,124	67,372	113,742
2022	43,375	32,914	26,707	20,551	43,374	1,825	52,760	1,459	69,483	29,953
Total	460,557		465,723		349,806		518,745		667,389	

Source: information from the NRA, the MoI, the CSO and the COSMC; table prepared by the SAO.

4.13 In order to ensure the operation of the ROB, RPP, ISZR and related IS, the NRA concluded 22 contracts in the audited period with a total contract value of CZK 1.7 billion. The SAO selected for audit a sample of 10 contracts and related public contracts related to the operation of the basic registers and the ISZR with a total contract price of CZK 1.5 billion. To ensure the operation and development of the ROS in the audited period, the CSO carried out 11 contracts in total, or, concluded 9 contracts with a total contract value of CZK 605.9 million exclusive of VAT, which were the subject of the audit. At the COSMC, the SAO audited 6 public contracts and 5 contracts related to the RÚIAN with a total contract value of CZK 406.6 million exclusive of VAT. In the case of the ROS and RÚIAN, all public contracts related to the operation were audited.

The NRA and the CSO ensured the operation of the ROS, ROB, RPP and ISZR through contracts concluded on the basis of a negotiated procedure without prior publication and subsequently without any tender procedure. These contracts were concluded with the same providers

4.14 Since 2014, the NRA and the CSO had made several attempts to outsource the operation of the BR through open or restricted procedures.²⁹ In neither case was a contract concluded.³⁰ For this reason, the operation and development of the ROS, ROB, RPP and ISZR were procured throughout the audited period through a negotiated procedure without prior publication and subsequently without a tender procedure³¹. Only the operation

²⁹ In 2014, the NRA launched a total of 3 restricted procedures (tenders) for the operation of the ROB, RPP and ISZR. The CSO launched an open tender for the operation of the ROS in 2015 and a restricted tender in 2016.

³⁰ The tender procedure was cancelled by decision of the Office for the Protection of Competition or by decision of the contracting authority after the submission of a petition for review of the act by the Office for the Protection of Competition.

³¹ Exemption pursuant to Section 18(1)(a) of Act No 137/2006 Coll., on public contracts, and exemption pursuant to Section 29(b)(3) of Act No 134/2016 Coll., on public procurement.

and development of the RÚIAN were procured on the basis of an open procedure. Each register and the ISZR have an identical contractual operator from the time of their first launch.

4.15 In order to verify the correctness and reasonableness of the determination of the estimated values of public contracts for the provision of operational services, the NRA and the CSO commissioned several expert reports between 2015 and 2022. The SAO identified shortcomings in the expert reports.

4.16 The SAO assessed that the expert reports on the operating contracts for the ROB, RPP and ISZR, which the NRA had commissioned in 2015 and 2016 (for which it had paid CZK 177,870), had no added value and could not provide objective and transparent verification of the values of the individual public contracts. The expert merely compared the estimated value of the public contract based on information from the providers contacted with a market survey carried out among the same set of providers. Thus, until 2021, the NRA had no instrument to verify the reasonableness of the prices it paid to providers for the provision of operational services.

4.17 On 31 May 2021, the NRA entered into a contract for the preparation of further expert reports. Their purpose was to set the prices of services for the contracts for the provision of support for the operation and development of the ROB, RPP and ISZR; the NRA planned to conclude these contracts in 2021. The contracts for the provision of support for the operation and development of the ROB, RPP and ISZR were concluded by the NRA with the providers on 16 and 17 December 2021. However, the expert reports were not submitted to the National Registers Authority until 31 December 2021. All the expert reports were therefore not available to the NRA until after the conclusion of the contracts for which it had commissioned the expert reports. The SAO found that the expenditure of CZK 1,016,400 on the preparation of these expert reports had been ineffective and uneconomical. By the aforementioned conduct, the NRA violated Section 45(2) of the Budgetary Rules.

4.18 In order to verify the correctness and reasonableness of the determination of the expected values of the PC for the provision of the ROS administration and development services in the years 2023-2026, the CSO commissioned an expert report. In the 2022 report, the expert compared the price of the current provider's tender with the prices requested in the call to submit a preliminary tender. However, the scope of work in the call for tenders was estimated by the CSO as a qualified estimate after consultation with the existing provider. Thus, the report could not provide an objective and transparent verification of the correctness and reasonableness of the determination of the assumed values.

4.19 As a consequence of the above (see paragraph 4.14), the NRA and the CSO were placed in a situation referred to as vendor lock-in, as they cannot de facto break free from their dependence on the existing providers of the operation of the BR. The SAO assessed this situation as a risk to the cost-effectiveness of the funds spent in connection with the operation and development of the BR.

The operational parameters of the BR system still correspond to the time of its creation in 2012

4.20 The operational parameters of the individual parts of the BR system, including the method of their measurement and subsequent evaluation, were described in the data sheets that were annexes to the contracts for the operation of the BR and ISZR. The SAO's audit of the monitoring and evaluation of the operational parameters of the BR system focused, in

particular, on two services from the data sheets: ensuring availability and ensuring the level of operation. The parameters of these services have been unchanged since the start of the BR operation.

4.21 The individual parts of the BR system (individual BR and the ISZR) have a contractually guaranteed availability of 99.9%. The provision of housing (placement of the ICT infrastructure in the data centre and ensuring the supply of electricity and cooling) is contractually assured with 99.98% availability and the individual parts of the system communicate via data lines that have a contractually defined availability of 99.9%. However, in the case where the agenda information system communicates with the selected BR, it is necessary to take into account the guaranteed availability of all components that enable and mediate such communication. The total guaranteed availability is then the result of the product of the availability of the individual components provided by external providers on the basis of a contractual relationship. However, the actual contractually guaranteed availability of BR services is lower, at 99.68%. In terms of the annual operation of the BR system, this situation, in communication with the individual AIS, represents up to 28 hours of contractually non-guaranteed availability without violation of the contractual penalty arrangements, which the SAO considers undesirable for such an important critical information infrastructure.

Example of calculating the maximum actual guaranteed chained availability

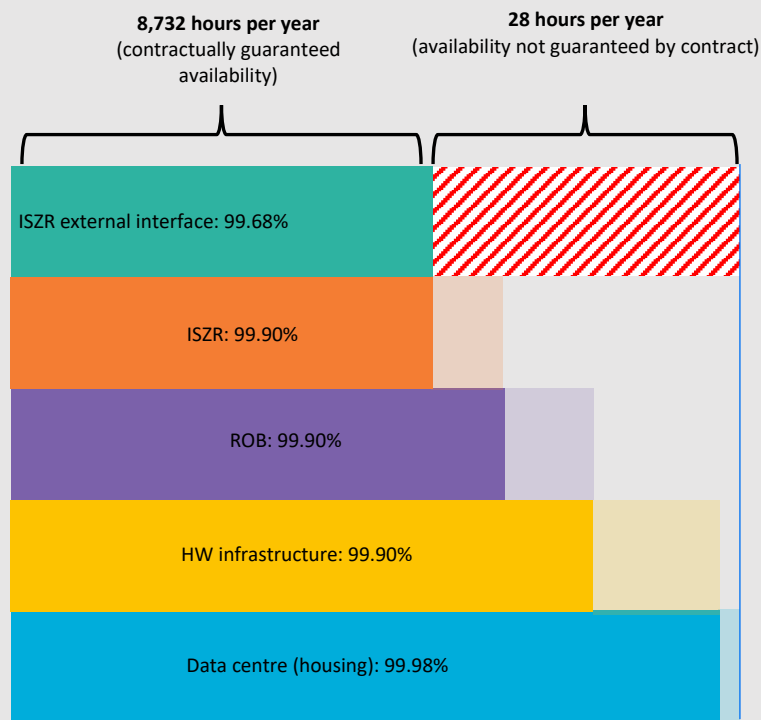
The auditors selected a model case where the AIS communicates with the ROB. In that case, the value of the annual guaranteed availability is the product of the availability of the following elements:

Communication HW infrastructure x housing (data centre availability) x guaranteed availability of the ISZR x guaranteed availability of the ROB

When specific availability values are entered, the result is a guaranteed annual availability in the 7x24 mode:

$$99.9\% \times 99.98\% \times 99.9\% \times 99.9\% = 99.68\% = 28 \text{ hours of contractually non-guaranteed availability per year}$$

Graphical representation of the resulting chained contractually guaranteed availability:



Note: It is important to note that this procedure is simplified and the actual process can be much more complex depending on the specific requirements and conditions. The check calculation performed includes communication terminating at the external interface of the ISZR.

4.22 At the operation service level, the providers contractually guaranteed to meet the maximum response time parameter (within 2,000 ms) in order to ensure the desired level of operation³². This parameter was de facto guaranteed only up to a maximum of 324,000³³ transactions per hour, since only up to this number of transactions could the individual BR administrators apply a discount for any failure to meet the maximum response time. The number of transactions processed by each BR is a basic monitored parameter of the BR system load. The number of transactions for each part of the BR system in 2016-2022 is shown in the table below.

³² In the case of the ISZR. Other register providers guaranteed to meet a maximum response time of up to 200 ms (again, subject to chaining).

³³ Applies to all parts of the BR system.

Table 4: Number of transactions in each year

	Number of transactions						
	2016	2017	2018	2019	2020	2021	2022
ROB	263,172,535	308,427,786	272,789,464	266,991,260	360,340,158	625,609,016	653,369,652
ROS	21,688,083	33,343,743	27,622,728	27,259,846	28,840,678	46,653,891	73,535,515
RPP	7,391,848	13,212,568	9,732,874	15,585,925	15,981,387	25,403,341	32,964,641
RÚIAN	84,811,208	91,352,755	79,260,709	70,084,387	89,475,215	140,408,236	201,546,193
ISZR	382,002,000	481,022,000	397,641,000	414,247,000	554,914,000	886,737,000	886,737,000

Source: information from the NRA, the MoI, the CSO and the COSMC; table prepared by the SAO.

4.23 The highest number of transactions each year was reported by the ISZR, which acts as a reference interface on which reference data is provided to users. For this reason, the audit focused on the ISZR in terms of ensuring the level of operation, i.e., the maximum number of transactions per hour. This parameter was set identically for all contracts for the operation of the ISZR. The highest number of transactions was recorded for the ISZR on 28 November 2021, with 161,969 transactions per hour. The average number of transactions per hour reached 94,025 between 2016 and 2022.

4.24 Thus, during the audited period, the number of transactions in hourly intervals never approached the threshold of 324,000 transactions per hour. At the maximum for the whole period, only less than 50% of the threshold was reached, but on average it was less than 30%. The SAO found that, in the contracts for the operation of the ISZR, the NRA had significantly overestimated the maximum number of transactions within which the provider had to guarantee that the maximum response time would be met. This capacity was not used during the entire audited period, even at the highest number of transactions recorded.

4.25 The SAO also found that the NRA had not monitored and evaluated the actual utilisation of the ISZR HW infrastructure. Thus, the NRA did not have any tool to verify that the parameters of the ISZR at the application and database level had been set by the provider to meet the actual needs of the NRA. On the basis of the above, the SAO draws attention to the possible risk that part of the funds paid for the operation of the ISZR was spent by the NRA in an uneconomical manner.

For the 2021 Census, the CSO received 80% of the information through online census. The field survey yielded only one-fifth

4.26 The 2021 Census was an internationally coordinated event, the purpose of which was, among other things, to produce and make available statistical information for the entire territory of the Czech Republic on private individuals, households and housing pool as of the record date of the census. For the Czech Republic, as an EU member, the obligation to conduct the census stemmed from binding EU legislation³⁴, which defines the basic forms of the census, definitions, content and structure of the data that is further transmitted to Eurostat³⁵.

³⁴ In particular, Regulation (EC) No 763/2008 of the European Parliament and of the Council on population and housing censuses. This Regulation establishes common rules for the decennial provision of comprehensive data on population and housing.

³⁵ Statistical Office of the European Union.

4.27 The Government of the Czech Republic, by its Resolution No 5³⁶ of 13 January 2016, approved the CSO's proposal to conduct a census based on the maximum utilisation of existing administrative data sources supplemented by a content-reduced field survey. Subsequently, the 2021 Census was modified by Act No 332/2020 Coll.³⁷ According to the provisions of Section 8 of that Act, the CSO was to collect through the census forms only the data that was not included in the public administration information systems for all persons and households subject to the census and data used to identify them.

4.28 The online census was conducted from 27 March to 11 May 2021 and the field survey from 17 April to 11 May 2021. A total of 83.8% of the census forms were received by the CSO through the online census and 16.2% through the field survey. The online census was carried out by the CSO exclusively through CENZIS³⁸. The field survey was carried out by the Czech Post and the CSO on the basis of the *Agreement on Horizontal Cooperation within the 2021 Census project, registration no ČSÚ:217/2019-S*, concluded on 29 November 2019.

4.29 The SAO verified that the main administrative data source for the 2021 Census had been the ROB supplemented with data from the Agenda Population Registration Information System and the Foreigners' Agenda Information System (all three systems are administered by the MoI). Other data on persons for the purposes of the 2021 Census was taken over by the CSO into CENZIS on a one-off basis on the basis of a request, registration or a concluded contract, inter alia from the Czech Social Security Administration, the MoLSA, the MEYS, the GFD, etc., using existing administrative data sources to the maximum extent possible.

4.30 The total expenditure incurred by the Czech Statistical Office for the provision of the 2021 Census from 2017 to 30 April 2023 amounted to CZK 1,815,542,668 including VAT. Of that amount, a total of CZK 317,016,253 was spent on providing information support for the 2021 Census, of which CZK 63,904,001 was spent on the acquisition and operation of CENZIS. In the total expenditure for the 2021 Census, another significant item was the expenditure related to the implementation of the above-mentioned Agreement on Horizontal Cooperation. The remuneration for the performance of the subject-matter of the agreement was set at CZK 1,060,999,390 including VAT. By Amendment 3 of 30 June 2021 (CSO reg. No: 101-2021-D), the remuneration was reduced to CZK 967,576,208 including VAT. Due to the fact that the process of financial settlement of the 2021 Census had not been completed at the time of the SAO's audit at the CSO, the total actual expenditure as of the date of the completion of the audit cannot be quantified.

³⁶ Government Resolution No 5 of 13 January 2016, on the method of conducting the census of population and housing in 2021.

³⁷ Act No 332/2020 Coll., on the census of population and housing in 2021 and on the amendment to Act No 89/1995 Coll., on the state statistical service, as amended.

³⁸ CENZIS was established to fulfil the purpose of Act No 89/1995 Coll. and to fulfil the obligations set out in the directly applicable European Union regulations in the field of migration and international protection, European demographic statistics and the census of population and housing. The information system was to process data from the 2021 census of population and housing, i.e., data from basic registers, other administrative data sources and data from paper and electronic census forms.

Management of basic registers

4.31 Until the end of 2022, the MoI performed the role of the central state administration authority for internal affairs, including in the area of public administration information systems, and also performed a coordinating role for information and communication technologies. In addition, under Act No 365/2000 Coll.³⁹ (hereinafter the “Information Systems Act”), the MoI had the obligation, by 31 March 2023, to create and submit to the Government for approval the Information Concept of the Czech Republic (hereinafter the “Information Concept of the CR”) and to ensure the checking of compliance with the obligations set out in that Act. In the context of the approved Information Concept of the CR, the role of the GCIS is important. At the central level of the BR, the chairperson of the GCIS established, on 17 January 2020, a working group called the “Basic Registers Council”, which was created to manage the implementation of the target concept of basic registers. The members of the working group were nominated from among the BR administrators, the Ministry of Finance, the Office of the Chief Architect, etc., with the Director of the NRA as the chairperson. The outcome of the “Basic Registers Council” is a resolution which, among other things, assigns tasks to the entities concerned. The following table provides an overview of the roles for each part of the BR system.

Table 5: Division of the administration of individual parts of the BR system*

	Subject-matter administrator ⁴⁰	Technical administrator ⁴¹	Operator ⁴²
ISZR	NRA	NRA	NRA
ROB	MoI OSČ	MoI OCIS	NRA
RPP	MoI eGOV	MoI OCIS	NRA
RÚIAN	COSMC	COSMC	COSMC
ROS	CSO	CSO	NRA

Source: information from the NRA, the MoI, the CSO and the COSMC; table prepared by the SAO.

* Until 31 March 2023.

The MoI did not have an approved information concept until 2 March 2023. Neither the MoI nor the NRA incorporated the BR 2.0 Concept into their approved information concepts

4.32 The MoI, as the central state administration authority for internal affairs and the coordinator for information and communication technologies, submitted for review the first working version of the Ministry of the Interior’s information concept (hereinafter the “Information Concept of the MoI”) prepared as of 14 August 2018. The MoI then gradually produced further working versions, but the approved version did not enter into force until 2 March 2023. The SAO found that the MoI had not incorporated the needs, objectives and

³⁹ Act No 365/2000 Coll., on public administration information systems and on amendments to certain other acts.

⁴⁰ A subject-matter administrator is a public administration authority or its department which is authorised (by the Competence Act or by an organisational regulation within the authority) as an agenda administrator to ensure the performance of a public administration agenda or an internal operational function/service, including its adequate support by information and communication technology services.

⁴¹ A technical administrator is the authority in charge of satisfying the requirements of a specialised department (the subject-matter administrator of the public administration information system) for ICT support of its agenda with the services of the corresponding ISVS or operational IS.

⁴² The operator ensures the functionality of the technical and software resources constituting the public administration information system. The administrator may entrust the operation of the public administration information system to other entities or their units, unless this is excluded by another law.

other aspects based on the BR 2.0 Concept into any of the produced versions of the Information Concept of the MoI, although from both the material and financial point of view the fulfilment of the BR 2.0 Concept was a key prerequisite for the electronisation of public administration. As a result, this could have contributed, among other things, to the failure to meet the deadline set for area no 1 “ensuring non-stop operation of the BR” according to the BR 2.0 Concept.

4.33 The SAO also found that the MoI had not had an overview of the Ministry’s information systems and overall architecture in the Information Concept of the MoI, a situation that persisted until the audit was completed. The MoI did not prioritise its needs together with a budget outlook for funds and did not set its long-term objectives for achieving the desired overall state in the management of the administered public administration information systems. As a result, the MoI could not define the general principles for the acquisition, architectural changes, creation, management, operation, use and development of its public administration information systems, and therefore did not act in accordance with Section 5a(2) of the Information Systems Act. The above-mentioned procedure of the MoI violated the relevant provisions of that Act and Section 1(a) of its implementing Decree No 529/2006 Coll.⁴³ (hereinafter the “Decree on the requirements for the structure and content of the information concept”).

4.34 The CSO did not specify and characterise the ROS as a public administration information system (hereinafter the “ISVS”), of which it is the administrator, in its information concepts, and did not evaluate compliance with the information concepts, thus failing to comply with the requirements of Section 5a(2) of the Information Systems Act, or Section 2, Section 5(1) and Section 7 of the implementing Decree on the requirements for the structure and content of the information concept.

4.35 Not all the information on the ISVS for which the NRA ensures the operation from the perspective of the ISVS operator was provided in the assessed information concepts of the NRA. The downstream information systems and interfaces that exist in relation to these ISVS were not mentioned either. The technical and technological competences, links and responsibilities for the individual components of the basic registers system (ROS, ROB, RPP, RÚIAN, ISZR) and ORG were not described and explained in the information concepts of the NRA. The NRA did not conduct an evaluation of compliance with the information concept at least once every 24 months. The submitted information concepts of the NRA do not meet the requirements of Section 5a(2) of the Information Systems Act, or Sections 2 to 5 and 7 to 9 of the implementing Decree on the requirements for the structure and content of the information concept, and thus are not documents that meet the needs of ISVS management in the NRA environment.

4.36 The NRA also failed to comply with the Information Systems Act when it did not link any of its information concepts to the BR 2.0 Concept, even though the concept included a definition of BR development, including specific implementation steps, time schedule and a financial framework. Thus, the NRA did not ensure that the information necessary for the operation and development of the basic registers and the ISZR was reflected in the legally

⁴³ Decree No 529/2006 Coll., on the requirements for the structure and content of the information concept and operating documentation and on the requirements for security and quality management of public administration information systems (decree on the long-term management of public administration information systems).

required document governing the management, security and development of the ISVS (i.e., the information concept).

In terms of funding, the approach of the individual BR administrators varied considerably. The Mol financed the BR mainly through its budget respecting the line management structure of the Ministry without using programme funding, whereas the COSMC and the CSO financed the BR through individual registered actions under programme funding

4.37 The Mol had an overview of BR-related expenditure for each department in varying degrees of detail and to different extents. The different departments responsible submitted reports in different structures and with different levels of detail (e.g., according to the amount of the budget after the inclusion of claims from unspent expenditure, without the inclusion of claims from unspent expenditure, or without any baseline of the approved budget). In one case, the department presented information on expenditure in annual summaries, in another case broken down by individual actions and in a third case broken down by accounting cases. The Mol, as the chapter administrator, did not monitor and evaluate the funds spent in connection with the operation of the BR. Furthermore, the Mol did not monitor the management of other current additional funds by which the expenditure budget for basic registers had been increased under chapter 314 – *Ministry of the Interior*. As the Mol did not monitor the use of these additional non-investment funds, it is not possible to trace and document their spending. The Mol thus did not create the conditions for economical, effective and efficient performance of public administration within the meaning of Section 25(1)(a) of Act No 320/2001 Coll. However, this evaluation at the level of the conditions of an efficient internal control system does not automatically constitute a questioning of the correctness of a particular financial operation (Section 2(l) of Act No 320/2001 Coll.).

4.38 Funds for the operation and development of the ROS in the period of 2015-2023 were provided by the CSO⁴⁴ through a total of 6 projects/actions financed under programme funding:

- 145 01 – *Development and renewal of the material and technical base of the Czech Statistical Office,*
- 045 01 – *Development and renewal of the material and technical base of the Czech Statistical Office from 2018,*
- 145 02 – *Development and renewal of the material and technical base of the Czech Statistical Office from 2021.*

The COSMC drew funds for the operation and development of the RÚIAN in the period of 2015-2023 also under programme funding, with a total of 5 projects/actions financed by the programmes:

- 046 01 – *Development and renewal of the material and technical base of the State Administration of Land Surveying and Cadastre,*
- 146 01 – *Development and renewal of the material and technical base of the State Administration of Land Surveying and Cadastre – from 2007,*
- 346 02 – *Development and renewal of the material and technical base of the State Administration of Land Surveying and Cadastre from 2019.*

⁴⁴ The CSO as the central authority was not only the programme administrator, but was also a programme participant in selected actions of the sub-programmes “acquisition, renewal and operation of ICT at the CSO”.

4.39 The usability of individual BR is mainly influenced by the quality of the data contained in them. The SAO's audit also focused on selected information systems administered by the audited entities in connection with the data filling into the RPP. According to Decree No 329/2020 Coll.⁴⁵, or Section 52c(2) of the Basic Registers Act, the ISVS administrator is obliged to record the relevant data in the RPP. In this context, the CSO violated the provisions of the Basic Registers Act and Decree No 329/2020 Coll. by not registering the ROS in the "Register of Public Administration Information Systems"; the ROS was not registered and maintained as a public administration information system until 22 June 2023. In the case of CENZIS, only half of the mandatory items were completed by the CSO.

4.40 The COSMC violated Decree No 329/2020 Coll.⁴⁵, or Section 52c(2) of the Basic Registers Act, as it did not record the relevant data in the RPP – in the case of the RÚIAN and the *Territorial Identification Information System*, it did not fill in approximately 1/3 of the mandatory items.

4.41 The quality of the data contained in the RPP has an impact on the functionalities of the basic registers system and, consequently, of the linked data pool. In this context, the SAO, with respect to the MoI, compared the output of the project *C2V5 Analysis of existing public administration information systems including their relevant legislation and identification of datasets for the public data pool*⁴⁶ of December 2022 with the data recorded in the RPP. On the basis of the comparison made, the Supreme Audit Office found that the MoI still incorrectly recorded 10 of the 12 data identified by the project in the RPP on the side of the agendas for which it was the notifier, thereby failing to fulfil its statutory obligation under Title V of the Basic Registers Act, by not keeping up-to-date and correct data for the above-mentioned agendas in accordance with the requirements of Section 51(6) of the Basic Registers Act.

4.42 The SAO considered that the non-population of data into the RPP had a negative impact on its usability (on data sharing and access to public administration data, on the functionalities of the interconnected data pool, hence the public data pool). The funds spent on the acquisition and operation of the RPP are thus assessed by the SAO as partially ineffective.

⁴⁵ Decree No 329/2020 Coll., on the list of items for the description of the public administration information system and the private law system for the use of data.

⁴⁶ Output of the project: *Development of data policies in the field of improving the quality and interoperability of public administration data CZ.03.4.74/0.0/0.0/15_025/0013983*.

List of terms and abbreviations

AIS	Agenda information system
CENZIS	Census Information System
CR	Czech Republic
CSSA	Czech Social Security Administration
CSO	Czech Statistical Office
COSMC	State Administration of Land Surveying and Cadastre
DIA	Digital and Information Agency
VAT	Value added tax
eGON	Shared agenda communication interface services
EU	European Union
GFD	General Financial Directorate
HW	Hardware
ICT	Information and communication technology (information and communication technologies)
Information Concept of the MoI	Information Concept of the Ministry of the Interior
Information Concept of the CR	Information Concept of the Czech Republic
IS	Information system
IS OVM	Public authority information system (Czech acronym)
ISVS	Public Administration Information System (Czech acronym)
ISZR	Information System of Basic Registers (Czech acronym)
IT	Information technology
IRS	Integrated Rescue System
BR 2.0 Concept	<i>Basic Registers 2.0 – Target Concept</i> (plan of transformation of basic registers of 2018)
MoLSA	Ministry of Labour and Social Affairs
MEYS	Ministry of Education, Youth and Sports
MoI	Ministry of the Interior
MoI eGOV	Ministry of the Interior – eGovernment Department
MoI OCIS	Ministry of the Interior – Department of Central Information Systems (Czech acronym)
MoI OSČ	Ministry of the Interior – Department of Administrative Activities (Czech acronym)
NIA	National Identification Authority
SAO	Supreme Audit Office
Office of the Chief Architect	Ministry of the Interior – Office of the Chief eGovernment Architect

ORG	Information system of identifiers of private individuals
ROB	Population Register (Czech acronym)
ROS	Register of Legal Entities, Private Individual Entrepreneurs and Public Authorities (Czech acronym)
RPP	Register of Rights and Responsibilities (Czech acronym)
RÚJIAN	Register of Territorial Identification, Addresses and Real Estate (Czech acronym)
GCIS	Government Council for Information Society
2021 Census	Census of population and housing conducted by the Czech Statistical Office in 2021
SW	Software
NRA	National Registers Authority
PA	Public administration
PC	Public contract
TD	Tender documentation
BR	Basic register(s)

List of abbreviated titles of regulations	
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Competence Act	Act of the Czech National Council No 2/1969 Coll., on the establishment of ministries and other central state administration authorities of the Czech Republic
Budgetary Rules	Act No 218/2000 Coll., on budgetary rules and on amendments to certain related acts (the Budgetary Rules)
Government Resolution No 650/2018	Resolution of the Government of the Czech Republic No 650 of 10 October 2018 on the Report on the Implementation of Government Resolution No 411 of 31 May 2017, on the Report on the need to launch a transformation project addressing the renewal and system development of basic registers and related systems
Decree on the requirements for the structure and content of the information concept	Decree No 529/2006 Coll., on the requirements for the structure and content of the information concept and operating documentation and on the requirements for security and quality management of public administration information systems (decree on the long-term management of public administration information systems)
Act on Financial Control	Act No 320/2001 Coll., on financial control in public administration and on amendments to certain acts (the Act on Financial Control)
Information Systems Act	Act No 365/2000 Coll., on public administration information systems and on amendments to certain other acts
Property Act	Act No 219/2000 Coll., on the property of the Czech Republic and the representation of the Czech Republic in legal relations
Act on Accounting	Act No 563/1991 Coll., on accounting
Basic Registers Act	Act No 111/2009 Coll., on basic registers