TERMS OF REFERENCE

Service Provider to Conduct the Information Management Audit for SAPO

General background

The Specialized Anti-Corruption Prosecutor's Office (SAPO), responsible for prosecuting high-level corruption cases in Ukraine, is one of the key institutional partner of the EUACI. As a public information holder, SAPO is subject to the Cabinet of Ministers Resolution No. 835 of 21 October 2015, which requires all such bodies to conduct an information management audit at least once a year. The audit must assess the availability, status, formats, management, and use of all information held by the institution, and the results must be published on the Unified State Open Data Portal.

In addition, the SAPO's Strategy, approved on 12 December 2025, includes a dedicated section on the development of a comprehensive data management system. This section provides for the audit of existing data sources and formats, identification of optimization opportunities, establishment of internal data management standards, and transparent publication of information in open data formats. A completed data audit with practical recommendations is explicitly listed among the Strategy's key deliverables.

To comply with its legal obligations under open data legislation and to advance its strategic objectives, SAPO has requested the EUACI's support in organizing and conducting the information management audit. The audit will assess existing data sources and formats, identify opportunities for improvement, and propose sustainable approaches to transparent open data management. In response, EUACI intends to engage a qualified service provider to carry out the audit.

Objective

Overall: To support SAPO in fulfilling its legal obligations under open data legislation and advancing the data management goals set out in its Strategy. Sub-objective: To conduct a comprehensive information management audit of SAPO and provide practical recommendations for optimizing its data collection, management, and publication practices.

Scope of work

The Service Provider shall perform the following tasks:

Data asset inventory

- Conduct a comprehensive inventory of all information and data assets held by SAPO, including registers, databases, document repositories, and other information resources.
- Record essential metadata for each asset (owner/unit, purpose, format, update cycle, access, and publication status).

Internal assessment and process mapping

- Analyze availability, status, formats, and current management practices of the identified assets.
- Map key workflows for data collection, processing, storage, quality assurance, and publication, including role mapping.
- Identify fragmentation, duplication/redundancy, excessive aggregation, data quality issues, and resource/technical constraints, including barriers to machine-readable publication.
- Methods: written questionnaires, interviews, and/or focus groups with relevant SAPO staff.

Demand and disclosure gap analysis

- Analyze FOI requests received by SAPO to identify recurring information needs, request volumes and trends, and items suitable for proactive disclosure.
- Assess whether SAPO systematically refers applicants to publicly available sources where relevant.
- Conduct surveys and/or interviews with key external stakeholders (journalists, CSOs, researchers, legal practitioners, international partners) to validate priority needs and usability requirements.

Proactive publication and open data assessment

- Assess information and datasets currently proactively published by SAPO, including machine-readability, completeness, and update regularity.
- Review available usage indicators where applicable (e.g., views/downloads) and assess whether user input informs proactive publication decisions.

Recommendations, reporting, and presentation

- Develop practical, prioritized recommendations for improving data management and proactive disclosure, including proposals for additional datasets suitable for publication as open data and suggestions to improvement of operational processes of collecting/analysis/publication of data with respective additions to job descriptions of relevant positions.

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- Prepare a final management audit report setting out key findings, recommendations, and a prioritized action plan for implementation.
- Present the findings and recommendations to SAPO staff, linking them to the underlying objectives and principles.

Deliverables

The Service Provider will be responsible for delivering the following outputs:

Deliverable/Output	Timeline
1. Methodology of the information audit (up to 5 pages, in Ukrainian)	Within one week of contract signature
2. Outline of the audit report (up to 2 pages, in Ukrainian)	Within 1 month of contract signature
3. Draft report with recommendations and prioritized action plan (up to 40 pages, in Ukrainian)	Within 5 months of contract signature
4. Presentation of the draft audit report to SAPO staff (venue is to be provided by the EUACI/ SAPO)	Within 5 months of contract signature
5. Final audit report with recommendations and prioritized action plan (up to 40 pages, in Ukrainian and in English)	Within 6 months of contract signature

Qualifications

Eligibility

The Service Provider may be a legal entity or a private entrepreneur (or a team thereof). In the case of a team, the contract shall be concluded with one lead contractor. The following eligibility conditions apply:

- No conflict of interest with SAPO;
- Fluency in Ukrainian (written and spoken) is mandatory.

Professional experience

- Minimum 2 years of demonstrated experience in conducting information management audits, data management assessments, or open data compliance reviews for public sector institutions;
- Proven track record of working with Ukrainian public authorities on information management, open data, or digital governance projects;
- Experience in developing data management frameworks, policies, or standards for government institutions.

Subject-matter expertise

- Demonstrated familiarity with Ukrainian open data legislation, including the Law of Ukraine "On Access to Public Information" and Cabinet of Ministers Resolution No. 835 of 21 October 2015.

Language

- Working knowledge of English is an advantage.

Practical Requirements

- Availability to work on-site in Kyiv as required;
- Ability to complete the assignment within the specified timeframe.

Budget

The maximum budget allocated for this assignment shall not exceed EUR 6,000. Payment for the services shall be made upon submission and approval of the final report. The amount shall be paid in UAH equivalent to the agreed EUR amount, calculated in accordance with the official exchange rate of the National Bank of Ukraine (NBU) applicable on the date of payment. The Service Provider may request an advance payment of up to 30% of the total contract value. The remaining 70% shall be paid upon satisfactory completion of the deliverables and their formal acceptance by the EUACI.

Timeframe

Six months from the contract signature date.

Reporting and management

The Service Provider's performance will be assessed based on whether the contract purpose is achieved and the required deliverables are produced, as set out in the "Objective" and "Deliverables" sections. Performance will also be assessed based on the proper completion of all activities listed in the "Scope of work" section.

By signing the contract, the Service Provider undertakes to keep confidential all information and documents obtained, created, or identified during the implementation of the contract.

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Such information may be used only for contract purposes and may not be disclosed to any third party. The Service Provider also undertakes not to keep any copies of written materials or prototypes after completion of the contract.

How to apply

The deadline for submitting the proposal is **10 March 2026 17:00 Kyiv time**.

All interested candidates should submit:

- The CV of the contractor/team of contractors;
- For legal entities/ organizations - background information on such entity;
- General budget for the scope of work;
- Any proofs/examples of similar work (if available).

The proposal shall include the aforementioned information and should be submitted within the above deadline to EUACI@um.dk and olemir@um.dk ,indicating the subject line "Information management audit for SAPO".

You should receive an auto-reply from the EUACI@um.dk mailbox when the offer has been received. If you do not receive an auto-reply, your offer was not received, and you should contact the EUACI by phone.

Bidding language: **English**.

Should the submitted documentation fail to meet the requirements set forth above, the bid shall not be considered.

Any clarification questions regarding the terms of reference should be addressed to olemir@um.dk, **no later than 6 March 2026 17:00 Kyiv time**.

Please note that the name of the tender winner will be published on the website of the EUACI.

Evaluation criteria

Bids will be evaluated under the criteria provided below:

#	Criteria	Weight
1	Criterion 1: Qualifications	70%
2	Criterion 2: Financial offer	30%