Ask the Project Manager: Pavel Jonis, using P3.express to comply with EU DORA regulation

The Digital Operational Resilience Act (DORA) is a regulation introduced by the European Union to strengthen the cybersecurity of the financial sector. It came into effect in January 2023, but the actual regulations won't apply until January 2025. DORA prescribes a comprehensive framework for ICT risk management within financial entities, encompassing aspects like robust risk identification, incident reporting protocols, and rigorous operational resilience testing. The regulation extends its reach beyond internal IT infrastructure. DORA mandates the implementation of robust ICT management policies and procedures to ensure data security throughout the lifecycle of ICT projects. Article 15 requires that financial entities develop, document, and implement an ICT project management policy. It includes that any ICT changes significant enough to be called projects need to have a straightforward process in place to manage them.

In this interview, Pavel Jonis discusses his experience implementing P3.express in a Lithuanian bank called Mano Bankas (mano.bank) to comply with the DORA regulation. Pavel Jonis is a project management consultant, trainer, and speaker who has successfully led the

implementation of several initiatives, ranging from IT Migration and Transformation Projects to implementing a functioning Project Management Framework.

Thank you for joining us, Pavel. You've been working on implementing P3.express in Mano Bankas to meet the DORA requirements. Can you give us a bit more background on the project?

A cybersecurity consulting firm brought me in to assist Mano Bankas, which is a mid-sized bank in Lithuania with around 100 employees. My primary task was to ensure compliance with the DORA requirements concerning the project management aspect of the regulation. I was asked to develop a comprehensive project management policy tailored to their needs and the legal requirements of the new regulation.

> "We selected P3.express because of its step-by-step approach and process-oriented nature..

Mano Bankas wanted a practical and applicable policy that would be actively used rather than a document that would sit on a shelf. The policy needed to reflect the company's specific business situation and be easily understood by its employees.

In creating the policy, we needed to define key terms and roles within the organization. This included clarifying what constitutes a project, identifying the responsibilities of a project sponsor and project manager, and outlining the selection

(1) https://www.pmi.org/learning/library/four-challenges-health-care-project-managers-3630

process for these roles. We also had to specify the pools of people from which sponsors could be chosen, ensuring that sponsors have sufficient organizational power. The final policy was based on P3.express.

That's very interesting! So why did you select P3.express as the basis of the policy?

We selected P3.express as the policy's basis because it fulfills the requirements of being practical and applicable. P3.express offers a step-by-step approach, making it a process-oriented system. Unlike other methodologies like PRINCE2, which provide detailed guidance on performing complex tasks, P3.express focuses more on what needs to be done and when rather than how to do it.

P3.express's flexibility in defining a project plan can be both a strength and a challenge. While many project management frameworks provide a rigid project plan, P3.express emphasizes working with people and managing processes within an organization. As an experienced project manager and educator, I find this approach empowering because it allows me to add specific details and techniques as needed. This flexibility of P3.express empowers project managers to adapt their approach to the unique needs of their projects.

This flexibility makes P3.express ideal for use alongside other resources like PMBOK (Project Management Body of Knowledge) once a project manager gains more experience. In the beginning, P3.express provides a solid foundation, and as one becomes more adept, one can integrate methods and techniques from other frameworks. Another advantage of P3.express is the Creative Commons License it offers. I am free to suggest it to my clients and adapt it as needed. The framework is open for modification and reuse as long as it is credited.

This freedom to customize ensures that the policy can be tailored to fit the specific needs of any organization.

Many financial institutions use an Agile method, such as Scrum, to develop their software. Would you consider this sufficient for the DORA regulations?

No, I don't consider Scrum sufficient to meet DORA regulations. DORA specifies the need for a complete project management policy. This policy must be a pre-approved and agreed-upon document that includes elements such as project objectives, governance, planning, risk assessment, key milestones, and change management requirements.

Scrum, while effective for organizing and managing teams in software development, lacks many of these critical components. It doesn't provide guidelines for risk management, procurement management, or even detailed scope management. Instead, Scrum focuses on team organization and performance over a set period. Understanding the limitations of Scrum in meeting DORA regulations is crucial for project managers to make informed decisions about their project management approach.

To comply with DORA, financial institutions need a comprehensive project management policy that covers all necessary aspects. While Scrum can be part of the process, it alone does not fulfill the requirements. For instance, DORA mandates the inclusion of staff dedicated to ICT projects and business activities, along with processes to report associated risks to management.
P3.express, on the other hand, provides clear governance with defined roles such as project sponsors and managers. It also allows for the integration of decision-making bodies like steering committees, which are crucial for financial institutions.

great advantage. P3.express is straightforward and easy to understand, which is particularly beneficial for those new to project management. It provides a clear, step-by-step approach, unlike other resources like PMBOK, which are more complex and focus on detailed processes.

One aspect we focused on was demonstrating the effectiveness of P3.express to experienced project managers, who were used to more detailed and complex project management methods.

P3.express is designed to tell you what to do and when to do it rather than how to do it. This is a strength because it allows for flexibility and adaptability. While experienced project managers initially might have seen it as lacking depth, they came to realize that it effectively covers the essentials and can be supplemented with additional information as needed.

A common concern was that P3.express doesn't cover the detailed "how-to" aspects of project management, such as handling dependencies and creating schedules. This is intentional, as P3.express focuses more on people and processes rather than technical details. This can be challenging for those who are used to traditional, detailed project management methods and tools like Microsoft Project.

However, once they understood that P3.express is a high-level framework designed to be simple and effective, they saw its value. It allowed them to focus on what truly matters in project management: working with people and managing processes efficiently.

So, I think it's a bit two-sided. There was initial hesitation, especially from experienced project managers, but the clear step-by-step approach that still allows them to use many of their own techniques ultimately won them over. For those

What was the reaction of project managers when drafting the project management policy and implementing P3.express in Mano Bankas? I assume they had their own way of working before the new policy was introduced. That must have been difficult to deal with.

Many project managers initially perceived P3.express as overly simplistic, especially those with years of experience. However, to be able to explain the complexity of project management activities in such a simple and elegant form is a

Project Managers without much experience, it's easy to grasp and gives them handles to hold on to when managing their projects.

Great. Based on your experience with this implementation, was anything missing in <u>P3.express</u> that needed to be there according to the Dora regulation?

Hmm, I think most of it was there. But maybe not in the detailed format that was needed. For example, DORA requires detailed planning elements such as objectives, planning milestones, and other specific data requirements. These are covered in the planning activities, but how they should be done is not really detailed. In my opinion, this omission is how it should be; it's in its nature. <u>P3.express</u> is designed to be minimalist and flexible. It's better to leave these specifics for different companies to define for themselves. Organizations can supplement <u>P3.express</u> with elements from other resources like PMBOK, which provides detailed guidance on these aspects. This way, there's no need to reinvent the wheel, and companies can tailor the policy to their unique needs while still complying with DORA.

Thank you for your time, Pavel. It's been great talking with you.

P3.**express** is a minimalistic project management system provided for free under a creative commons Attribution license and used in over 60 countries worldwide.

mano.**bank** is a Lithuanian financial institution, that positions itself as a specialized business bank offering personalized service, rapid decision-making, and innovative financial solutions, with a focus on measurable results, efficiency, and professional support.