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INTRODUCTION: PRESENTATION OF THE MANUAL AND OF COURSE OBJECTIVES

This manual is intended for participants in the training course entitled "e-Domec: the role of the DMO, the Document Management Centre and of DMO correspondents". The overall aim of this course is for participants to become familiar with, and able to apply, current European Commission policy on the management and retention of documents and files.

The manual, which is issued to participants at the end of the course, summarises all the points addressed during the course, and should enable participants to find all the necessary information they may need in order to:

- understand the Commission's policy framework as regards the management of documents and files;
- be aware of the life cycle of documents and files, from creation/reception to elimination or transfer to the Historical Archives;
- understand different ways of organising files and documents;
- understand records management tools (file list, filing plan, common retention list, archive schedule, etc.);
- understand the role and functions of the DMOs, the Document Management Centres (CADs) and equivalent services;
- understand the technology and systems used in the field;
- navigate through the various reference texts and manuals produced by the Commission.

For any further information, please contact your DMO (Document Management Officer¹) or your COFO (Training Coordinator)

¹ List: <http://www.cc.cec/home/dgserv/sg/edomec/index.cfm?lang=en&page=photosdmo>

I. CONTEXT AND OBJECTIVES

An institution such as the European Commission is both a producer and a user of information. In order to rationalise the production, retention and access to documents drawn up and received in the course of its activities, as from January 2002 the European Commission has established a records management policy: **e-Domec** (Electronic archiving and Document Management in the European Commission). This policy also applies to the Executive Agencies and the European External Action Service (EEAS).

1. Several objectives, a single policy

Proper records management ensures that departments retain records of their activities in order to

- ensure they have robust, legally admissible evidence of their work;
- provide accountability and transparency for their actions and decisions;
- guarantee rapid and easy access to information; amongst other benefits, this means that decisions can be taken as rapidly as possible;
- reinforce security;
- improve the quality and continuity of public service;
- reduce administrative costs and save time.

e-Domec: Electronic archiving and Document Management in the European Commission.

This records management policy was formally launched by the Commission in January 2002, with the adoption of the basic normative framework establishing the rules and procedures of records management (Commission Decision 2002/47).

e-Domec is designed to ensure:

- preservation of the European Commission's institutional memory;
- an improvement in the quality of files within units;
- greater standardisation of procedures: rules and procedures common to all Directorates-General/Departments;
- monitoring and accountability to oversight bodies (IAS, OLAF, European Court of Auditors, European Parliament);
- transparency with regard to European citizens;
- the integration of ICT (Information and Communication Technology) and evolution towards the e-Commission with the introduction of electronic archiving.

2. Legal foundations and obligations

These texts may be consulted via the *e-Domec* Intranet website.

2.1. DIRECT LEGAL TEXTS

➤ 2.1.1. Fundamental decisions

◆ **Commission Decision 2002/47/EC, ECSC, Euratom**

Provisions concerning document management

- Art. 1: Definitions of documents and files
- Art. 2: Objectives of the document management system
- Art. 3: Presentation of document management operations: registration – filing – retention – transfer of files to the Historical Archives
- Art. 4: Registration
- Art. 5: Filing
- Art. 6: Retention
- Art. 7: Pre-selection and transfer to the Historical Archives
- Art. 8: Treatment of classified documents
- Art. 9: Role of the Document Management Centres
- Art. 10: Role of the Document Management Officer (DMO)
- Art. 11: Role of the Interdepartmental Group of DMOs
- Art. 12 – 15: Adoption and implementation of rules

◆ **Commission Decision 2004/563/EC, Euratom**

Provisions concerning electronic and digitised documents (DOCELEC)

➤ 2.1.2. Implementing rules for the founding texts

- **Implementing rules for Decision 2002/47/EC, ECSC, Euratom on document management and for Decision 2004/563/EC, Euratom on electronic and digitised documents: SEC(2009)1643**
- Chapter II.2 – Registration
- Chapter II.3 – Filing
- Chapter II.4 – Retention
- Chapter II.5 – Appraisal and transfer to the Historical Archives
- Chapter III – Electronic and digitised documents
- Annex 1 – List of metadata
- Annex 2 – Criteria to be respected by any registration system
- Annex 3 – Definition of key concepts relating to registration criteria
- Annex 4 – Structure of the Common Retention List
- Annex 5 – Exceptional rules applicable to the transfer of files
- Annex 6 – List of priority electronic procedures

◆ **Common Retention List (CRL): SEC (2007) 969-970**

Regulatory document that sets retention periods for the various types (also called "categories") of Commission files.

2.2. ASSOCIATED LEGAL TEXTS

➤ **Internal control standards for efficient management**

Of the 16 internal control standards, six have direct repercussions on obligations regarding records management in Directorates-General and departments:

- **n°6:** "Risk management": risk management encompasses the protection of information.
- **n°8:** "Processes and procedures": drawing up adequate documentation on the operational and financial processes and procedures implemented by a DG, and on information systems. This documentation must be user-friendly, accessible and kept up to date.
- **n°9:** "Supervision": Management at every level supervises the activities for which it is responsible and keeps track of the main problems identified. This managerial supervision covers matters of legality and regularity, as well as operational performance.

In particular, a unit manager must be able to guarantee that a reliable and comprehensive official file exists for every case on which her/his unit is Lead Department.

- **n°10:** "Continuity of operations": Appropriate provisions must be in place to ensure continuity of service in the event of a "normal" interruption of activity. This includes transmission files and backup systems for financial transactions and operational activities.
- **n°11:** "Document management": Appropriate procedures and processes must be in place to guarantee safe and effective document management, in particular to ensure that the necessary information can be readily found. This standard entails that any document meeting the conditions set out in the implementing rules must be registered, filed in an official file and retained for the period stipulated by the document management rules.

It is essential in particular to guarantee that all staff are familiar with registration, filing and retention procedures and apply them in practice in the Directorates-General and departments.

- **n°13:** "Accounting and financial information": Adequate checks and procedures are in place to guarantee that accounting data and related information used in the preparation of the organisation's annual accounts and financial statements is accurate, comprehensive and available in timely fashion. This implies an obligation for all staff concerned to keep accounting and financial documentation up to date and accessible.

➤ **Provisions on security**

Commission Decision 2001/844/EC, CECA, Euratom, dated 29 November 2001: Introduction of a global security system for all fields of Commission activity requiring a certain degree of confidentiality, and determination of the conditions applying to the management of classified EU information.

➤ **Provisions on the protection of personal data**

Regulation (EC) n° 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by Community institutions and bodies and on the free movement of such data.

➤ **Public access to documents**

Rules setting out the general principles and limits governing exercise of the right of access to documents held by the Commission (drawn up or received by the Commission and in its possession):

- **Regulation (EC) n° 1049/2001** of the European Parliament and of the Council, regarding public access to European Parliament, Council and Commission documents.

➤ **Opening of Historical Archives to the public**

Regulation n°1700/2003 of the Council amending Regulation (EEC, Euratom) No 354/83 concerning the opening to the public of the Historical Archives of the European Economic Community and the European Atomic Energy Community.

➤ **Financial regulation**

Regulation (EC, EURATOM) n° 1605/2002: basic precepts and rules governing the Community budget: budgetary and financial management, keeping and presentation of accounts, public procurement and the award of grants, liability of authorising officials, accounting officials and internal auditors, and arrangements for external control and the discharge procedure.

➤ **Code of good administrative behaviour**

Principles on which relations between the public and the Commission must be founded: lawfulness, non-discrimination, proportionality of measures to the aim pursued, consistency in administrative behaviour.

- **Decision 2000/633/EC**, CECA, Euratom, of 17 October 2000: Code of good administrative behaviour for staff of the European Commission in their relations with the public.

➤ **EMAS**

The Eco-Management and Audit Scheme

- **Regulation (EC) n° 761/2001**: a Commission environmental management programme aimed at reducing consumption of resources and the generation of waste. Compliance with archiving rules can have significant environmental impacts.

Pursuant to these texts, all DGs and Departments (including Cabinets) must:

- **Register** all documents received or formally drawn up as part of their activities
 - *Decision 2002/47 – Article 4 of the annex*
 - *Implementing rules – SEC (2009) 1643: Chapter II.2 - Registration*
- Establish a **filing plan** and set up **files**
 - *Decision 2002/47 – Article 5 of the annex*
 - *Implementing rules – SEC (2009) 1643: Chapter II.3 - Filing*
- **Retain** the documents and official files that are related to their responsibilities
 - *Decision 2002/47 – Article 6 of the annex*
 - *Implementing rules – SEC (2009) 1643: Chapter II.4 - Retention*
 - *Common Retention List – SEC (2007) 969-970*
- **Appraise and transfer** their files to the Commission's Historical Archives as per the Common Retention List
 - *Decision 2002/47 – Article 7 of the annex*
 - *Regulation 1700/2003 – Article 7*
 - *Implementing rules – SEC (2009) 1643: Chapter II.5 – Appraisal and transfer to Historical Archives*

3. Actors in records management

Records management is part of everyday responsibilities and concerns everyone at the Commission:

- the Commission as an institution;
- the Directorates-General;
- equivalent departments, Cabinets, Offices, Delegations, etc.

Executive agencies also apply the e-Domec rules².

The implementation of records management (e-Domec) is based on a three-level organisation, set out in legal texts:

- an “e-Domec Steering Committee”;
- an “Interdepartmental Group of Document Management Officers (GIS-DMO), made up of Document Management Officers (DMO) officially designated within each Directorate-General or equivalent department;
- Document management centres (CAD, for "Centre d'administration des documents"), within each Directorate-General or equivalent department.

² Unless otherwise specified, the abbreviation “DG” in this manual covers all the departments mentioned above.

3.1. A STRUCTURE SUPPORTING RECORDS MANAGEMENT

➤ 3.1.1. The e-Domec Steering Committee

The Steering Committee is a group of seven Directors-General holding office in turn.

The mission of the Steering Committee is to:

- approve the implementation strategy for the e-Domec policy, which stems from the administrative reform launched in 2000 by the Prodi Commission, and to set priorities;
- oversee the monitoring and quality of overall project implementation;
- clarify as necessary the responsibilities of each individual for execution of the proposed measures;
- draw up a multi-year action plan, based on proposals from the Interdepartmental Group of Document Management Officers, and ensure its regular updating.

➤ 3.1.2. The e-Domec team (Secretariat-General)

The e-Domec team (Secretariat-General) is responsible for coordinating actions and monitoring the implementation of standards governing records management.

The mission of the e-Domec team (SG.B2) is to:

- establish the implementing rules for the registration, filing, retention, appraisal and transfer of documents and files to the Historical Archives;
- defining, in conjunction with DIGIT, the functional specifications of IT applications;
- assessing information systems used by the Directorates-General for compliance with e-Domec, on the basis of criteria defined in conjunction with DIGIT;
- defining and maintaining the common nomenclature and ensuring coordination with the specific filing plan headings under Directorate-General mandate;
- drawing up and updating the Common Retention List;
- establishing procedures for archive appraisal;
- ensuring coordination between Directorates-General: through working with Document Management Officers, and through the provision of training and information.

➤ 3.1.3. Role of DMOs (Document Management Officers)

Article 10 Decision 2002/47

- Mandatory: 1 per Directorate-General/Department
- Recommended: 1 DMO and 1 Deputy DMO

The DMO's mission covers:

- the design and introduction of the records management and archiving system in the DG: adaptation of general rules to the specific characteristics of the DG;
- training, information and advice for DG departments and officials;
- verification of the proper application of rules and procedures;
- crosscutting coordination with the CADs and/or network of DMO correspondents in the DG;
- interdepartmental coordination with DMOs in other DG/Departments;
- management and updating of two instruments:
 - the DG filing plan: organisation of files according to the DG's activities;
 - the archive schedule for the DG's files: establishing the rules and retention periods for official files after their closure.

➤ **3.1.4. Role of the Document Management Centre (known under the French acronym: CAD) and equivalent services**

Article 9 Decision 2002/47

- Their mission is to
 - guarantee that documents received or drawn up by each DG or equivalent department are managed according to the rules;
 - manage, organise and retain documents;
 - guarantee archive availability when needed;
 - apply the common retention list;
 - preserve the authenticity of documents;
 - apply the "Code of good administrative behaviour" in records management

- In order to perform these functions, the CAD staff concerned must:
 - be able to identify the different types of documents and know whether they need to be registered and filed;
 - assign and/or check the "metadata"³ associated with documents and files;
 - be familiar with the tools of records management (registers, file list, storage plan, etc.);
 - be familiar with the filing plan and its implementation procedures (DG filing plan and Commission common nomenclature);
 - understand the retention list and apply the retention periods set out in the DG archive schedule.

➤ **3.1.5. Role of unit/department staff**

◆ **DMO correspondent in the Unit**

- Acts as the link between the unit and the DG Document Management Officer (DMO): participates regularly in correspondent network meetings (in certain DGs, the CAD is made up of the group of DMO correspondents);
- under the auspices of the head of unit and in concertation with the DMO, implements e-Domec rules on registration, filing, archiving, appraisal and transfer of files within the department ;
- provides training, information and advice to unit officials, and to newcomers in particular, on records management;
- alerts the head of unit and/or DMO in the event of failure to apply e-Domec rules;
- manages the unit's list of official files: creation, management and closure of official files in Ares (via NomCom3);
- manages the storage plan: organises the physical retention of official paper files to guarantee their protection;
- implements retention rules for closed files, in accordance with the archive schedule.

◆ **Document managers**

- Apply the rules governing records management and archiving;

³ Metadata: data describing the context, content and structure of documents and their management over time.

- Responsible for the registration, filing and retention of documents, regardless of medium, in the systems provided for, under the supervision of the DMO (Document Management Officer) or of the head of the Document Management Centre (CAD);
- File documents in files;
- Communicate the files and documents required for the work of the unit/department;
- Receive, retain and locate documents and files for ease of access by those concerned.

3.2. DIFFERENT ORGANISATION MODELS POSSIBLE

Each DG must have at least a CAD and/or a network of DMO correspondents. The organisation models may differ, depending on the specific characteristics and constraints unique to each DG.

| | CENTRALISED MODEL Single CAD for the entire DG | DECENTRALISED MODEL Several small CADs distributed through the DG/functions handled by departments | HYBRID MODEL Central CAD plus one or more smaller CADs |
|-------------------|--|--|---|
| Procedures | Documents arrive at/leave from a centralised location | Documents arrive at or leave from different locations | Several models, including documents arriving at/leaving from one or several locations |
| Staff | Specialised staff within a distinct unit | Staff (in particular the DMO correspondents) share the tasks | Tasks distributed between the central department and the units |
| Tools | Equipment and other tools are centralised | Equipment and other tools are shared between several locations | Equipment and other tools are shared between several locations |
| Costs | Lower costs but centralised budget | Higher costs, but distributed over several different activities | Hybrid costs, part centralised, part distributed |

II. PRINCIPLES OF RECORDS MANAGEMENT

1. Basic concepts

1.1. RECORDS MANAGEMENT CONCEPTS

Records management⁴, covers all the management operations performed by a private or public organisation regarding the information essential for its activity.

Records management is defined by international standard ISO 15489 published in 2001. It is a method that provides for accurate and systematic control of the creation, receipt, retention, use and final destination of archive documents produced and received by an organisation as part of its activities, regardless of medium and format.

Records management covers a subset of information within organisations. It covers information necessary to ensure the smooth running of the institution and to protect its activities, the retention of which must be guaranteed over time.

In determining which documents are useful, what counts is not just their information value (content), but also their value as evidence.

These are referred to as **records**.

Records: Set of documents, regardless of date, form and physical medium, produced or received by a physical or legal entity and by any department or organisation in the exercise of its activity.

1.2. DOCUMENTS NEEDED AS "RECORDS"

There are three main reasons why a document may be needed as record:

- for purposes of information: to facilitate decision-making;
- as proof or evidence;
- to demonstrate regulatory compliance.

Commission definition of a document

(Decision 2002/47/EC art. 1)

Any content drawn up or received by the Commission concerning a matter relating to the policies, activities and decisions falling under the institution's mandate and in the framework of its official tasks, in whatever medium (written on paper or stored in electronic form or as a sound, visual or audio-visual recording).

⁴ This manual employs the term "records management", even if at the Commission, the term "document management" is generally used to refer to "records management".

1.3. RECORDS MANAGEMENT OPERATIONS

The records management system must make it possible to organise, find, protect and retain documents recording the activities of the institution.

In order for the records management system to meet these objectives, it is essential that:

- documents of importance to the Commission should be identifiable, understandable and secure: **registration**;
- documents can be linked to the context in which they were received or produced: **creation of files**;
- useful documents and files can be found easily: **filing** in official electronic files and possible **storing** in supplementary official paper files;
- files are retained in a reliable and continuous manner throughout their life cycle: **retention**;
- files with no further administrative use are eliminated or transferred to the Historical Archives in accordance with the **Common Retention List**.

2. The records life cycle and the administrative cycle

The **life cycle** of a file corresponds to the stages or periods in the life of the file from its “birth” (creation or receipt by the department) and throughout its administrative processing until it is transferred to the Historical Archives or destroyed in accordance with regulations.

The life cycle is divided into **3 stages**:

- **Current records or open files**: official files open and in use by the departments that produced them.
 - Official electronic files are managed by e-Domec compliant applications (the shared hard drive is only a storage space, and has no probative value).
 - Official paper files are generally retained in the offices or in close proximity.
- **Intermediate records**: closed files which must continue to be retained for administrative or legal reasons (for inspection, for example). DGs retain these files, in accordance with their archive schedule, throughout their administrative retention period (ARP). In the case of hybrid files (containing both electronic and paper files), the paper archives must be retained in an area specifically designed for the purpose.
- **historical records**: closed files which, depending on the appraisal rules applicable, are transferred to the Commission’s Historical Archives Service (HAS) and selected for permanent retention in view of their historic interest.

During the first two phases, the DG is responsible for the oversight of registration, filing and storage systems designed for easy search and rapid, efficient document retrieval when necessary.

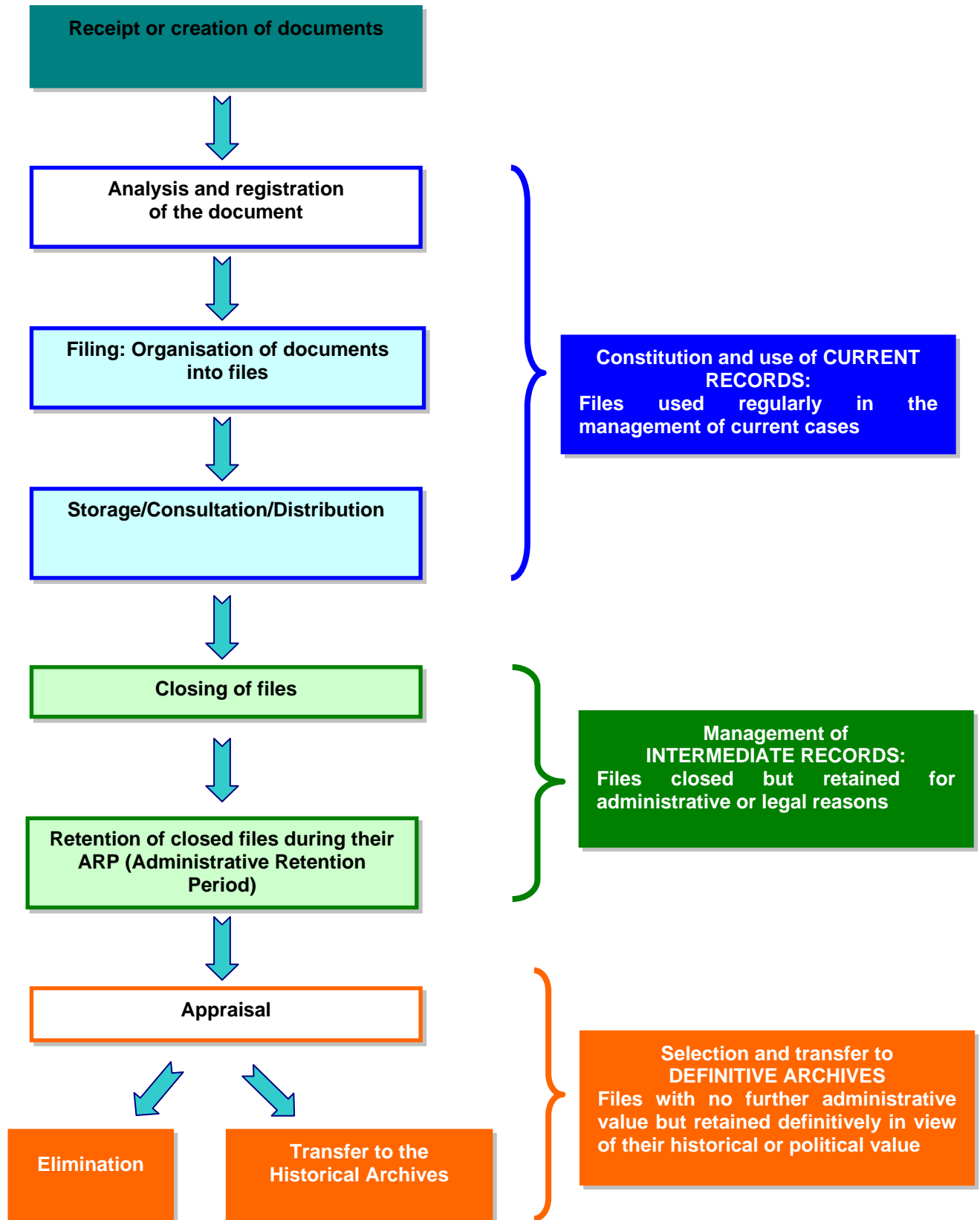
⇒ In parallel to the life cycle, records also have a corresponding **administrative cycle** that covers the various stages of records management:

| Life cycle | | Administrative cycle |
|---------------------------------------|---|---|
| ① Receipt/ creation of documents | ⇒ | <ul style="list-style-type: none"> - Analysis and registration: identification of the document and certification of its administrative value - Filing: association of the document with an official electronic file associated with a filing plan heading |
| ② Current records = Open files | ⇒ | Active phase: <ul style="list-style-type: none"> - Retention and storage - Distribution and consultation - File closure |
| ③ Intermediate records = Closed files | ⇒ | Semi-active phase <ul style="list-style-type: none"> - Retention and storage - Distribution and consultation Final phase: <ul style="list-style-type: none"> - Appraisal for destruction for files of no further value or transfer to Historical Archives for files with historical value. |
| ④ Definitive archives | | Files which, in accordance with the Commission's Common Retention List, are transferred to the Commission's Historical Archives and selected for permanent retention. |

The records management system must therefore be equipped to manage all processing procedures throughout the life cycle:

- production and capture of useful information: relevant, reliable and accessible;
- processing: analysis and registration, filing, assignment and follow-up;
- management of access: normal, restricted/classified;
- retention for the short, medium and long term;
- possible elimination or transfer to the Historical Archives for definitive archiving.

Document and file life cycle and administrative cycle



III. DOCUMENT REGISTRATION

1. Why register?

Registration is the operation that attests to the administrative value of a document drawn up or received by a department as evidence of the activities, policies and decisions for which it is responsible.

Registration makes it possible to:

- identify the document with certainty,
- attest to the transmission and receipt of the document in accordance with established procedures,
- manage the document efficiently (assignment and follow-up) by guaranteeing its traceability throughout its life cycle,
- incorporate the document into the Commission archiving system and protect it from unauthorised modification or deletion quickly and easily retrieve useful information.
- find back useful information quickly and easily.

The document registration operation takes place in 4 stages:

1. Identification of documents to be registered: **analysis** phase;
2. Input of a document description sheet: **encoding** or input of **metadata**;

Metadata: data describing the context, content and structure of documents and their management over time.

3. Attachment of the document in electronic format to the description sheet;
4. Administrative follow-up: assignment, distribution, schedule, etc.

2. Analysis or identification of documents to be registered

"As soon as a document is received or formally drawn up within a department, in whatever medium, it shall be analysed with a view to determining what is to be done with it and thus whether or not it must be registered."

Source: C(2002) 99 final. Annex: Provisions on document management: Art. 4

Not all documents need to be registered: analysis of the content and context of a document received or drawn up is used to distinguish between:

- Documents that the department absolutely must retain because they contain important information, involve follow-up/action on the part of the Commission, have been endorsed and signed by the competent official and will form part of an official file.
- Documents that need not be retained and that are not subject to registration.

2.1. DOCUMENT FORM

According to ISO 15489 on Records Management, prior to registration the document must be checked for:

- **authenticity**: it is possible to identify without ambiguity the author, principal addressee, date of creation/issue/receipt/processing of information.
- **reliability**: the content may be considered as a complete and accurate representation of the operations, activities or facts attested, and may serve as a reference in subsequent operations, activities or facts.
- **integrity**: the information contained in the document and the relevant metadata are complete and correct (the document has undergone no formal modification).
- **exploitability**: location of the document (index number for a paper document or URL for an electronic document) and legibility over time.

2.2. DOCUMENT ORIGIN

A document, which constitutes both a physical medium and a vehicle for information, may be:

- **A received document**: a document addressed formally to the entity concerned in the Commission.
- **A drawn up document**: a document designed and finalised within a distinct unit, regardless of its format and medium.

⇒ The processing procedure is different depending on the origin of the document.

2.3. VERIFICATION OF REGISTRATION CONDITIONS

➤ 2.3.1. Documents to be registered

The identification of documents to be registered, or "**analysis**", consists of analysing both the **content** and the **context** of a document received or drawn up, in order to determine whether or not it should be officially registered.

⇒ Any document, regardless of medium, must be registered if it meets 3 conditions:

① Received or formally drawn up by a Commission department as part of its activities

and

② a) Likely to involve action or follow-up, or to require a reply from the Commission or its departments

or

b) establishes a commitment for the Commission or its departments

and

③ Contains important information that is not short-lived

⇒ Documents drawn up to provide evidence of acts or intentions or to further understanding of the case should also be registered (for example: briefings and some "notes to the file").

VERIFICATION OF REGISTRATION CONDITIONS

① Was the document formally drawn up or received by a Commission department as part of its activities?

Documents received:

Check whether the document has been correctly received, i.e. is **available** to the department(s) to which it is addressed:

- document reaching the premises of the department
or
- document handed to the official competent to handle the case to which the document refers
or
- document handed to the official competent to receive and process incoming documents.

Documents drawn up:

Check whether the document has been subject to **formal transmission** by its author (person or entity formally responsible for the document content), i.e. if it was considered ready for transmission to its final addressee (individual, department or information system).

⇒ Registration is the final operation before sending on the document to its final addressee.

N.B.: A document ready for transmission is not necessarily the final version of the document; Significant drafts of a document may also be considered ready and be subject to registration.

and

② Does the document involve action, follow-up or reply, or is it binding upon the Commission or its departments?

Any document on a subject relating to the policies, activities or decisions of the Commission or its departments is binding upon the Commission.

and

③ Does the document contain important information that is not short-lived?

Any document that contains important information that is not short-lived must be registered. Information is considered unimportant and short-lived (i.e. useful for only a very short period of time):

- if the loss of the information involves no negative administrative or legal impact on the Commission,
- or if its value is clearly only temporary and destined to disappear shortly (in less than six weeks),
- or if its value is clearly ancillary (it is not the main information) or instrumental (it is only a means of implementing an action defined in another document).

or

④ Has the document been drawn up as effective administrative or legal witness to acts, situations, intentions or events associated with the activities of the Commission and its departments?

Any document that meets these conditions must be registered by the department concerned.

⇒ For precise information on the documents that must be registered, contact the **DMO** (Document Management Officer), who is responsible for defining the practical procedures implemented by the DG in accordance with the regulatory texts.

➤ 2.3.2. Exceptions to the registration requirement

◆ General exceptions

Certain documents need not be registered, even if they meet all the required conditions, **as long as** other procedures guarantee results equivalent to those of registration:

- Documents distributed in multiple copies to Commission departments and checked by another responsible body (such as COM, SEC, C);
- Documents whose processing and retention are managed by a reliable procedure (MIPS or SYSPER2 applications, for example);
- Documents and communications exchanged between departments without specific formalities (e-mails exchanged informally and in good faith for comment and consultation between Commission departments).

◆ Registration and Code of good administrative behaviour

Recommendation on registration of replies to requests for information and exchanges of correspondence with the public pursuant to the code of good administrative behaviour

(Note to Document Management Officers – SG.B.3/MH D(2005)2687 – 17 March 2005)

Any exchange of correspondence with the public pursuant to the code of good administrative behaviour and which does not contain information that is important and not short-lived need not be registered in Ares. This applies particularly to requests for information of a general nature (request for information which, in reply, does not require examination of the particular case presented but can be answered by a simple form letter or referral to the Commission website).

In order to keep a trace of the request and justify the work performed, however, it is recommended that such requests and replies be simply saved (in a "Replies" file kept on an annual basis and eliminated after two years – hence, a 2010 file will be eliminated in 2012).

➤ 2.3.3. Procedural constraints

◆ Public procurement procedures : registration of tenders

In files relating to public procurement procedures, tenders are important documents that have to be registered. But one has to take the procedural constraints into consideration:

- It is not allowed to open the tenders as they are received: they can therefore not be registered and scanned into ARES until after the opening of tenders meeting ;
- The "record of opening of tenders" (standard form provided by DG BUDG), list of received tenders, their origin, date of submission and whether they are in order or not (tenders that are not in order are not opened. To guarantee the identification of the tenders, noting the moment when they were received and their follow-up suffices.
 - ⇒ It must be registered in ARES.

Also, the following procedure is recommended :

1. The registration of the "record of opening of tenders" can replace the individual registration of each tender.

It is up to the responsible authorising officer, or possibly the Director-General, to request, in addition, the registration of each individual tender.

2. Whether the tenders are registered individually or not, it is possible to digitize them, but not obligatory nor even recommended when the tenders consist of a substantial number of pages.

However, it is up to the responsible authorising officer to decide whether the tenders will only be kept in paper form or whether all tenders have to be scanned in their entirety or only the first page of each.

Copies of the tenders have to be destroyed after signing the contract : only the originals have to be preserved.

3. It is recommended to guarantee the confidentiality of the tenders until their destruction after the archiving period (5 years for rejected tenders, 10 years for the public procurement file containing the original winning tender) or until their transfer to the Historical Archives (a representative percentage of these files will be kept for historical purposes).
4. Regardless of the decisions taken, it is important that the departments know where the paper version of the tenders can be found, from the moment they are received and during their treatment, and then whether they are archived or destroyed.

2.4. PROTECTION OF PERSONAL DATA

Personal data is any information that makes it possible to identify a particular individual.

The protection of personal data is a primary requirement for the Commission. It applies equally to correspondence from citizens (unsolicited job applications, in particular) and to members of staff.

➤ 2.4.1. Administration of personal data

Personal data must be:

- administered equitably and in accordance with the law, for limited and clearly stated purposes,
- adequate and relevant,
- kept accurately and up to date,
- retained for as long as necessary,
- kept securely,
- protected from transfer to third parties without adequate precautions being taken.

The official responsible for data protection must be informed of the administration of personal data.

Recommendation on the registration of personal data

(Note to Document Management Officers – REG SG D(2005) D 1102 – 8 February 2005)

1) CVs and unsolicited job applications:

The HR DG operates an Internet portal entitled "EU CV on line⁵" for the use of citizens wishing to submit unsolicited applications, including applications from winners of open competitions.

⁵ http://ec.europa.eu/civil_department/job/cvonline/index_en.htm

In addition, applicants should contact the DG Human Resources Department for information on the procedure to be followed for the DG in question.

2) Unit or DG/Department personnel files:

- cf infra page 41

➤ **2.4.2 Exceptions to the transfer of personal data**

Exceptions to the transfer of personal data are made:

- with the agreement of the individual concerned,
- in the interests of the individual concerned,
- when legally necessary on the grounds of significant public interest,
- when the transfer emanates from a public register.

For any questions, please contact the DG **DPC (Data Protection Controller)**

2.5. CLASSIFIED DOCUMENTS AND SECURITY MARKINGS

➤ **2.5.1. Classification and security markings**

Classification involves the allocation of a security level to a document whose unauthorised disclosure might be damaging or prejudicial to the interests of the EU or one of its member States.

“Classified” documents include:

- Documents classified "EU TOP SECRET" / "TRES SECRET UE"
- Documents classified "SECRET UE"
- Documents classified "CONFIDENTIEL UE"
- Documents classified "RESTREINT UE"

Security markings are not a classification but a “handling instruction” indicating how the document so marked is to be treated. This has particular consequences on the visibility of the document (definition of the individuals or groups allowed access to the document).

The full list of security markings applicable is drawn up by the Security Directorate (DG HR) ⁶.

➤ **2.5.2. Management of classified documents**

These documents are subject to special treatment even within the Commission: classification is the assignment of an appropriate security level.

- Documents classified as "EU TOP SECRET", " SECRET UE" and "CONFIDENTIEL UE" are registered in special registers only.
- “RESTREINT UE” documents must be registered in Ares but without attaching the electronic version of the document.

For any questions, please contact the **LSO (Local Security Officer)** of your administrative unit.

⁶ See Security Notice: http://www.cc.cec/security/security_notices/security_notices_en.htm

➤ 2.5.3. Management of documents with security markings

- Documents with security markings must be registered in Ares **with** (*except for OLAF and COMP markings*) **the electronic version of the document attached** and selecting the appropriate marking.
- Depending on the marking assigned, it may be possible to indicate an expiry date.

2.6. ROLE OF THE FILE MANAGER

The file manager plays an essential role in ensuring compliance with registration requirements. The file manager must:

- transmit or indicate to the department/individual responsible for registration all documents to be registered
- remember to have “certifying” e-mails registered

Rules for the composition of “certifying” e-mails:

E-mail is an increasingly important tool for swift, easy communication. It can be used to replace simple spoken communication or telephone calls (informal e-mail), but can also be used for formal written communication, both internal and external (certifying e-mail).

⇒ A certifying e-mail is a document that is binding upon the Commission (formally received or drawn up by a Commission department as part of its activities): as such, it must be registered.

As with any administrative document, there are certain basic principles of composition to be known and respected:

- 1) 1 single topic
- 2) 1 significant object
- 3) Clear identification of the author and signatory: use of a “signature block” or visiting card
- 4) Clear identification of the main addressee: full name and address in the address book or indication in the addressee message header (on the same principle as a printed letterhead)
- 5) Indication in the body of the message of the list of attachments (attachment name and document titles)
- 6) Indication, where necessary, of whether the paper document follows by post
- 7) Indication of the registration number in the object of the e-mail

Registration of an e-mail with attachment(s)

Any attached documents are also registered under the same registration number.

Registration of a series of e-mails:

In the case of a series of successive e-mails on the same subject, only the final e-mail can be registered, with no retroactive registration of preceding e-mails (each being not significant independent of the others). In this instance, the registration metadata are those of the final e-mail.

- Check regularly that the official file is complete

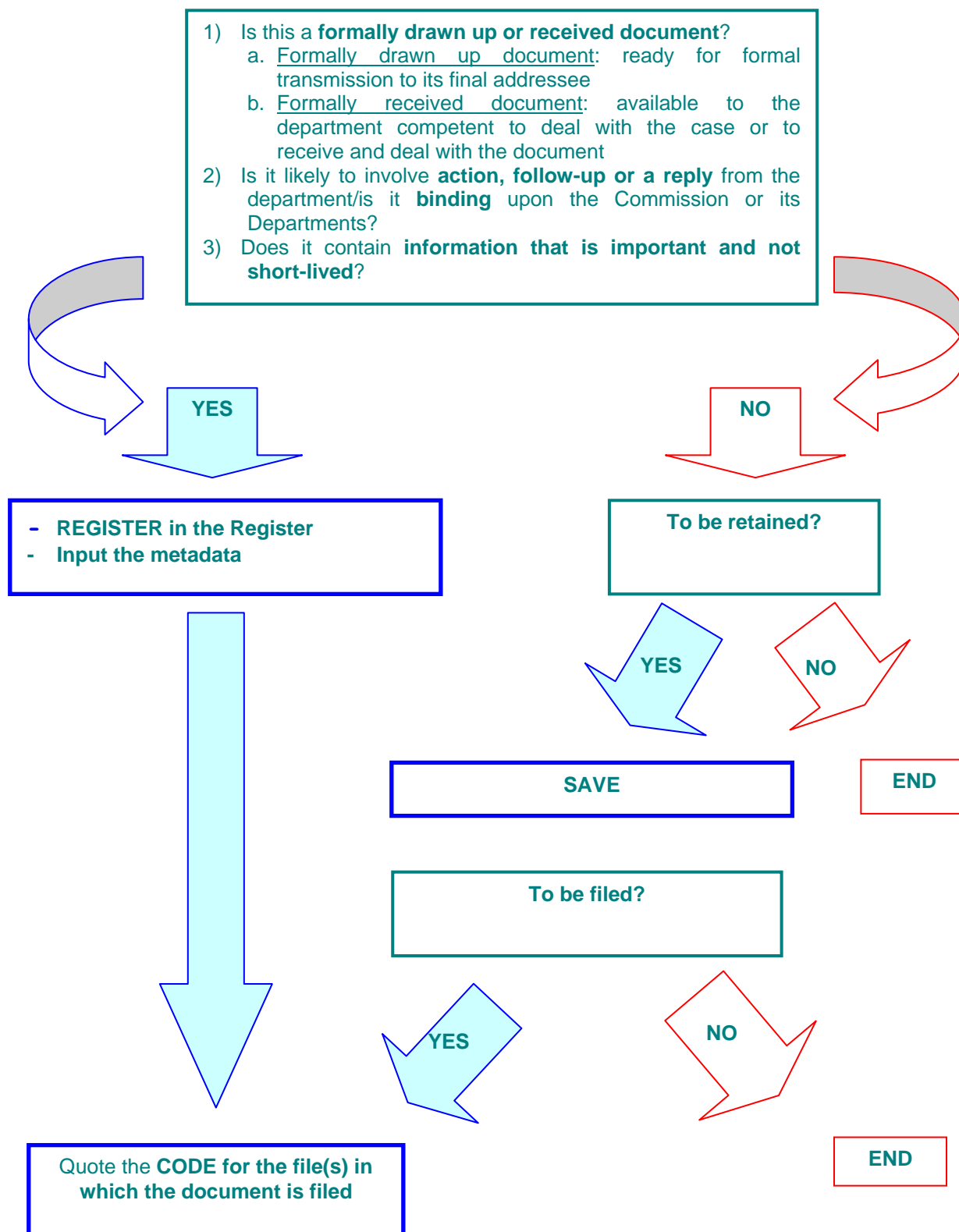
Useful hint:

An official file must contain all documents that are binding upon the Commission or useful to its life and activities.

To check whether this is the case, ensure that all documents that may be useful in the event of:

- disputes
 - audit
 - transmission of the file
- have been registered.

Document analysis and registration



3. Registration

3.1. METADATA OR DESCRIPTIVE DATA FOR A DOCUMENT TO BE REGISTERED

Registration is intended to provide for clear, definite identification of documents drawn up or received by the Commission or one of its departments, in such a way as to guarantee the traceability of the documents concerned throughout their life cycle.

Registration makes it possible to:

- identify the document with certainty
- attest to the document's:
 - origin: author, addressee, dates (of receipt, of sending or of integration into the system);
 - transmission by its author to an addressee;

In order to do so, descriptive information (known as "**metadata**") is included when the document is registered, in an operation known as **encoding**.

Identifying elements are indicated as needed, particularly as regards search for and use of documents. These elements must be as standardised as possible; it may be helpful to consult checklists and procedural manuals:

- ⇒ A document must be registered as soon as possible after it has been formally drawn up or received.
- ⇒ Correct input of metadata makes it easier to search for documents and to find supporting documents easily.

3.2. ATTACHMENT OF THE ELECTRONIC VERSION OF THE DOCUMENT

Except in specific cases (classified documents, documents with OLAF or COMP markings, documents that cannot be digitised), the electronic version of the document must be attached to the Ares registration sheet.

- ⇒ **In Ares:**
 - Registration is only possible if the electronic version of the document is attached to the registration sheet. It is impossible to add an attachment after registration.
 - Only translations of the document may be attached after registration.
 - Each document attached must be identified by type: Cover note/Main document/Annex.

ARES workflow (e-signatory):

In Ares, it is possible to introduce a workflow procedure:

- 1st stage: saving a working document with attachment of the document in its native form and identification of addressees able to comment on/modify the document (e-signatory).
- 2nd stage: registration of the finalised and approved document with traceability of successive versions of the document.

Registration metadata in Ares

| MINIMAL METADATA | COMMENTS |
|----------------------------------|---|
| Document tab | |
| Mail type | <ul style="list-style-type: none"> ▪ Internal mail: correspondence sent or received within the Commission or between the Commission and an executive agency or the European External Action Service (EEAS) ▪ Incoming mail: correspondence from an external sender received by the Commission, an executive agency or the EEAS ▪ Outgoing mail: correspondence sent to an addressee external to the Commission, the executive agencies and the EEAS. |
| Document date | Date appearing in the text of the correspondence |
| Received Date (<i>sic</i>) | Date on which the document is received |
| Sent Date (<i>sic</i>) | Date on which the document is sent to its addressee |
| Encoding date | Date on which the document is encoded (generated by the system) |
| Title/Subject | Succinct description of the document's content giving an overall understanding of what it concerns without having to read it in detail. |
| Sent by | Author(s) or organisation(s) formally responsible for the content of the document. To be selected from the " <i>int</i> " or " <i>ext</i> " list depending on whether the sender is internal or external to the Commission |
| Recipient(s) / Distribution list | A distribution list (a predetermined group of people) can be used to complete the addressees line in an item of correspondence. This saves time by entering an entire group of recurrent addressees in a single action. |
| Security and Markings | <p>Level of sensitivity: Used in Ares to encode and process documents for which a security level is required. 3 possible levels:</p> <ul style="list-style-type: none"> - Normal (default option) - Handling restriction (security marking) - RESTREINT UE <p>Attachment of the document is mandatory for the first two levels (except for "OLAF" and "COMP" markings) and forbidden for "RESTREINT UE" documents.</p> |

3.3. REGISTERS AND APPLICATIONS WITH EQUIVALENT EFFECT

The operation of registration is carried out in **registers**: databases containing the metadata of documents registered by the departments.

➤ 3.3.1. Registers

A register is an administrative instrument recording the receipt and sending of documents that are complete and correctly constituted in legal or administrative terms, and their proper transmission.

The register must contain the references of every formal document received and/or transmitted.

A distinction is made between:

- The **general register**: used for the registration of incoming, outgoing and internal correspondence and notes to the files (**Ares** at the Commission headquarters and **Delores/Adonis** in the Delegations)
- **Specific registers**: used to register documents subject to specific procedures without having to re-encode them in the general register (guarantees equivalent to the general register: inclusion of minimal metadata, audit trail for modifications, security in the event of system failure).

Examples

- **ABAC Contracts**: Management of contracts involving a financial commitment (invoice follow-up)
- **Basil**: Management of parliamentary questions in Commission Departments and Cabinets and search engine on parliamentary questions
- **CHAP**: Registration and management by the SG of correspondence involving complaints
- **Delores** : general register for the incoming and outgoing correspondence in the delegations
- **e-Greffe**: transmission and management of the Commission's decision-making procedures
- **EU Pilot**: exchange of information with member States as part of checks on the application of Community law
- **Gestdem**: workflow management for requests for access to European Commission documents (initial and confirmatory requests and resulting complaints to the Ombudsman)
- **Sybil**: management of relations between the President's Cabinet and the DGs on drafting replies to correspondence addressed to the President.
- **Tsar II** (Tracking Smart Assistance Request) : management of briefings for Commissioners and Directors-General.

⇒ Only the e-Domec (SG) team is authorised to determine whether an application may be recognised as a specific register⁷.

⁷ The complete list of e-Domec specific registers and applications can be consulted at: <http://www.cc.cec/home/dgserv/sg/edomec/index.cfm?lang=en&page=compliance>

➤ 3.3.2. Applications with effect equivalent to the register

This corresponds to applications that do not have all the characteristics of a register but that are sufficiently reliable to be used as such for the purposes of identification and filing.

Examples

- **CIS-Net**: system for monitoring the official stages of transmission and processing of interdepartmental consultations (launch, contributions, replies, closing).
- **SG Vista**: information system managed by the Secretariat-General, giving access to non-classified documents of the Commission, the European Parliament and the Council and making it possible to follow the progress of internal and inter-institutional procedures and parliamentary questions.
- **MIPS**: Logistics management for missions
- **Poetry**: Management of translation requests
- **Syslog**: Management of professional training programmes (creation of courses, enrolment, assessments, etc.), with filing in individual files (the file code is the employee number).
- **Sysper2**: information system for managing the Commission's human resources. Management of all aspects of career development, with filing in individual files (the file code is the employee number).
- **Webdor-Presto**: Webdor is an application for managing conference room bookings. It displays the list of bookings and details of each individual booking. Presto offers the same features for drinks orders.

Remark:

A number of applications are currently being adapted to become "e-Domec compliant". One example is **NIF**, used for the **management of infringements** in application of Community law, which is not yet compatible. A totally compatible version is under development.

⇒ **A document must be registered once only, in the appropriate register.**

Interactions between Ares and the specific registers:

- **Interdepartmental consultations (CIS-Net)**: The document launching an interdepartmental consultation is registered in Ares/Adonis prior to the official launch in CIS-Net. The follow-up of interdepartmental consultations (replies from the DG consulted) must be carried out exclusively in CIS-Net (no supplementary registration of replies in Ares).

An official file must be created by the DG launching the CIS, noting under the "Comments" heading that the documents are managed in CIS-Net.

A DG consulted may use Ares to coordinate preparation of its reply and obtain line management approval, but this is not a substitute for the use of CIS-Net: the reply, approved at DG level, must be registered in CIS-Net.

- **Parliamentary questions (Basil)**: Basil is the system used for dealing with a parliamentary question (assignment of a parliamentary question in order to register the reply in the same system).

In addition, a DG may use Ares to coordinate preparation of its reply and obtain line management approval, but this is not a substitute for the use of Basil: the reply, approved at DG level, must be registered in Basil.

➤ 3.3.3. Saving a document

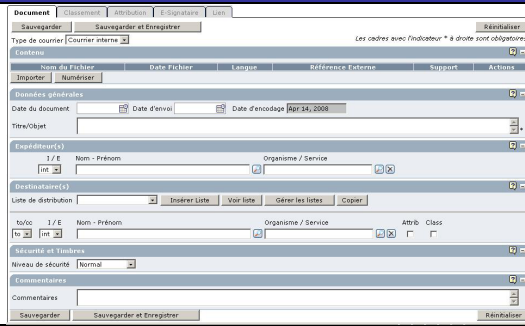
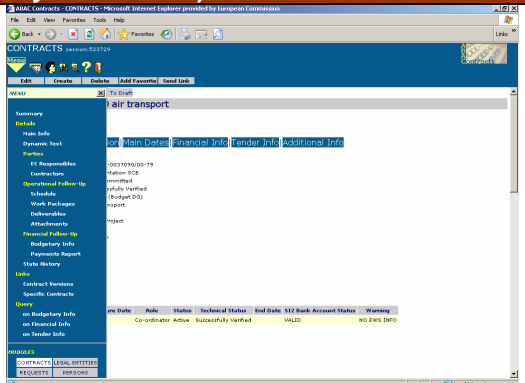

A document that does not meet the conditions for official registration may be simply **saved**.

The aim is to notify the existence of a document in order to retrieve it easily: this simple notification is not a registration. It does, however, allow for documents to be filed in the files as supplementary information.

Examples:

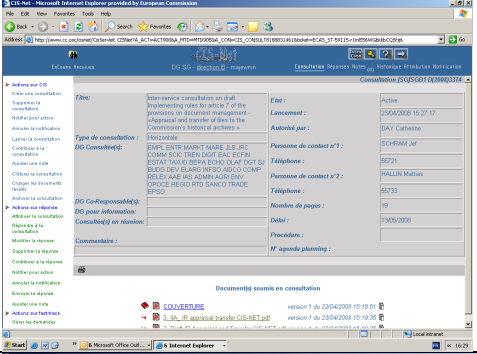
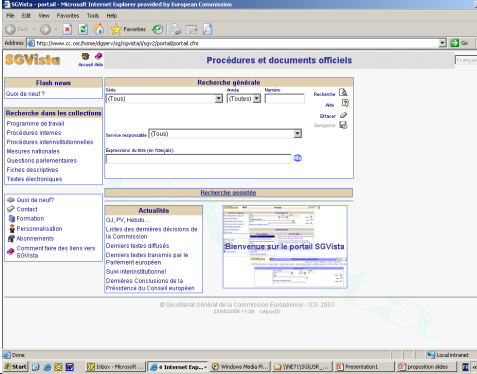
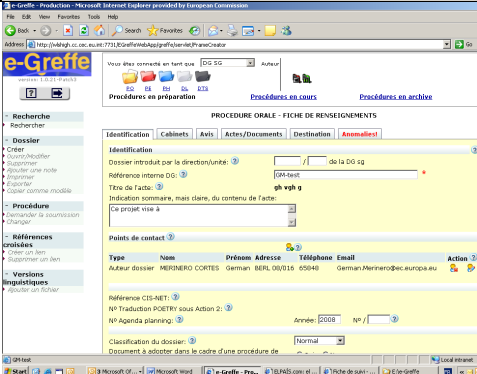
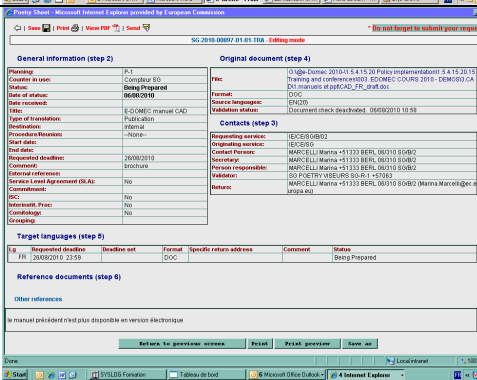
- **Ares**: "**Save**" function
 - **CIRCA**: an application that creates restricted-access websites for communication between individuals inside and outside the Commission. CIRCA offers calendar, chat, document publication and access management features. CIRCA is not a register.
- ⇒ Using the "Save" function in Ares depends on procedures established in the DG or the Department:
- transmission of a document for comment/modification and signature (workflow function with e-signatory),
 - identification of information or working documents,
 - notification of documents registered in specific registers, etc.
- ⇒ A document can be registered after it has been saved.
- ⇒ In ARES, a document that has been saved but not filed is retained for six months; after six months, the document is destroyed.
- If the saved document is filed, it is not subject to the six-month limitation. Only when the file is closed will the system ask what is to be done with the saved documents: elimination or post facto approval for the documents to be included in the closed file.

Registration: choose the right application⁸

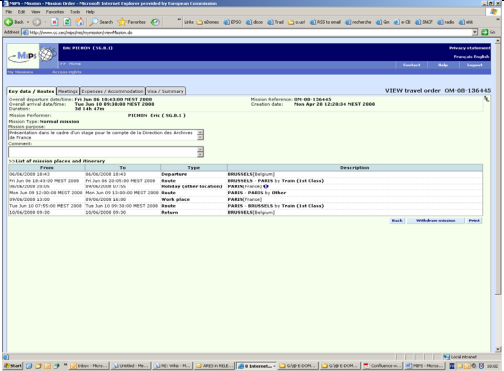


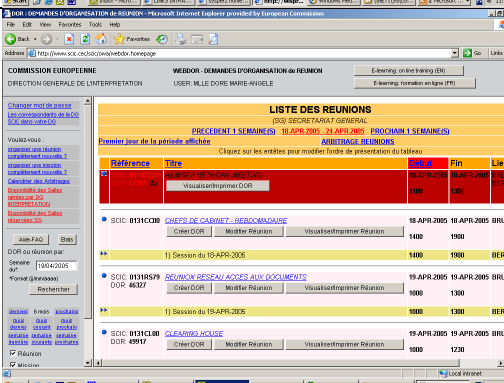
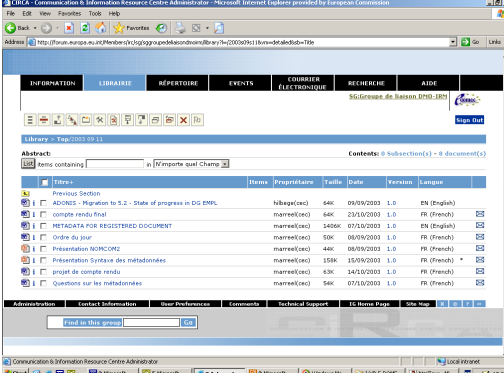
| GENERAL REGISTER: used for the registration of incoming, outgoing and internal correspondence and notes to the files. | | |
|--|---|--|
| Ares | General application for the management of files and documents |  |
| SPECIFIC REGISTERS: any other register constituted by a similar procedure, distinct from the general register but offering equivalent guarantees (inclusion of minimal metadata, audit trail for modifications, security in the event of system failure). | | |
| ABAC | Management of contracts involving a financial commitment |  |
| Sybil | Management of relations between the President's Cabinet and the DGs on drafting replies to correspondence addressed to the President. |  |

⁸ The complete list of E-Domec compliant applications can be consulted at:
<http://www.cc.cec/home/dgserv/sg/edomec/index.cfm?lang=en&page=compliance>

APPLICATION WITH EFFECT EQUIVALENT TO THE REGISTER: applications that do not have all the characteristics of a register but that are sufficiently reliable to be used as such for the purposes of identification and filing.

| | | |
|-----------------------------------|--|--|
| <p>CIS-Net⁹</p> | <p>Management of interdepartmental consultations, used for monitoring the official stages (launch, contributions, replies, closing).</p> |  |
| <p>SG Vista</p> | <p>Information system managed by the Secretariat-General, giving access to non-classified documents of the Commission, the European Parliament and the Council and making it possible to follow the progress of internal and inter-institutional procedures and parliamentary questions.</p> |  |
| <p>e-Grefte</p> | <p>Management of written or oral electronic decision-making procedures.</p> |  |
| <p>Poetry</p> | <p>Management of translation requests.</p> |  |

⁹ CIS-net will become a specific register as soon as all the minimal registration and filing metadata are present.

| | | |
|----------------------------------|--|--|
| <p>MIPS</p> | <p>Logistics follow-up for missions with filing in individual files (the file code is the employee number).</p> |  |
| <p>Syslog</p> | <p>Management of professional training programmes (creation of courses, enrolment, assessments, etc.), with filing in individual files (the file code is the employee number).</p> |  |
| <p>Sysper2</p> | <p>Information system for managing the Commission's human resources. Management of all aspects of career development, with filing in individual files (the file code is the employee number).</p> |  |
| <p>Webdor-Presto</p> | <p>Webdor is an application for managing conference room bookings. It displays the list of bookings and details of each individual booking. Presto offers the same features for drinks orders.</p> |  |
| <p>Communication tool</p> | | |
| <p>CIRCA</p> | <p>An application that creates restricted-access websites for communication between individuals inside and outside the Commission. CIRCA offers calendar, chat, document publication and access management features.</p> |  |

Summary table of register and repository for information applications

| Application | General register (1) | Specific register (2) | Process with equivalent effect (3) | Save function (4) | Filing | Attachment of electronic document |
|-----------------------|-------------------------|--------------------------|---------------------------------------|----------------------|----------|-----------------------------------|
| ARES | X | | | X | X | X |
| Sybil | | X | | | X | X |
| ABAC | | X | | | X | X |
| Basil | | X | | | X | X |
| CHAP | | X | | | X | X |
| Delores/Adonis | X | | | | X | X |
| e-Grefe | | X | | | | X |
| Gestdem | | X | | | | X |
| CIS-Net | | | X | | | X |
| SG Vista | | | X | | | X |
| MIPS | | | X | X | X | X |
| Poetry | | | X | | | X |
| Syslog | | | X | | X | X |
| Sysper2 | | | X | | X | X |
| Webdor-presto | | | X | | | X |

- (1) **General register:** used for the registration of incoming, outgoing and internal correspondence and notes to the file.
- (2) **Specific register:** used to register documents subject to specific procedures without having to re-encode them in the general register (guarantees equivalent to the general register: inclusion of minimal metadata, audit trail for modifications, security in the event of system failure).
- (3) **Application with equivalent effect:** applications that do not have all the characteristics of a register but that are sufficiently reliable to be used as such for the purposes of identification and filing.
- (4) **Save:** notification of the existence of a document (repository for information).

IV. FILING: FILES AND FILING PLAN

1. Why file?

Principle of filing:

- ✓ Documents are drawn up or received as part of a **case**.
- ✓ To simplify the management and retrieval of all documents relating to a particular case, they must be associated within a single **file** to which a unique identification code is assigned.
- ✓ In order to simplify the retrieval of electronic files, they are allocated to an appropriate heading of the **filing plan**.
- ⇒ For each case dealt with by a Lead Department, there must be a complete and reliable official file.
- ⇒ Every document registered must be filed in an official file.
- ⇒ **The real working instrument is the file.**

Files that are properly managed, complete and reliable can be used to:

- retrieve useful information rapidly
- rationalise tasks
- support collaborative work
- ensure accountability
- facilitate mobility

2. Official file and working file

2.1. DEFINITION OF A CASE

Definition of a case:

A case is a coherent set of administrative measures begun either explicitly, following instructions from the appropriate hierarchical level, or implicitly, as part of a specific procedure, and ending with the completion of the instructions or expiry of the procedure.

Source: SEC(2009)1643: Implementing rules on document management and on electronic and digitised documents.

- ⇒ A case is a set of administrative actions carried out as part of a determined procedure (with a **beginning** and an **end**).

2.2. DEFINITION OF A FILE

Definition of a file:

Core around which the documents are organised in line with the institution's activities, for reasons of evidence, justification or information and to guarantee efficient working. The group of documents making up the file is organised in such a way as to form a coherent and relevant unit in terms of the activities conducted by the Commission and/or its departments.

Source: SEC(2009)1643: Implementing rules on document management and on electronic and digitised documents.

- ⇒ The file serves as justification, proof or information on a case. Its proper management is a guarantee of efficient and relevant work.
- ⇒ The file is thus a set of documents relating to a particular case and organised consistently. The aim is to be able to find all the documents relating to a case as quickly and easily as possible.

2.3. TYPES OF FILES

➤ 2.3.1. Official file and working file

There are two types of files managed during the everyday follow-up of cases:

- **Official file:** a single file managed by the Lead Department responsible for the file and containing all the supporting documents relating to a case.
 - ⇒ Each official file must be complete: it must contain at least all the officially registered documents relating to a case, and any other document useful in handling the case.
 - ⇒ It constitutes evidence and must be retained.
 - ⇒ It must be subject to inspection and audit.
 - ⇒ It will be checked prior to closure and then, at the end of the administrative retention period, will be transferred, if appropriate, to the Historical Archives for retention and public consultation.
- **Working file (or information file):** file created for working purposes, with content determined by the officials responsible for compiling it. It is used to retain documents that have not been registered but that have some short-term usage. They may include: copies of documents, non-finalised versions of documents, documents not subject to registration requirements (collections of notes, technical reference material, copies of articles, telephone call logs, non-certifying e-mails, drafts, etc.)
 - ⇒ working files have no legal value.
 - ⇒ they might be destroyed at any time without the loss of essential information.
 - ⇒ they will be eliminated on closure of the file and excluded from the intermediate records.

Only official files are subject to e-Domec obligations and internal control standard n°11.

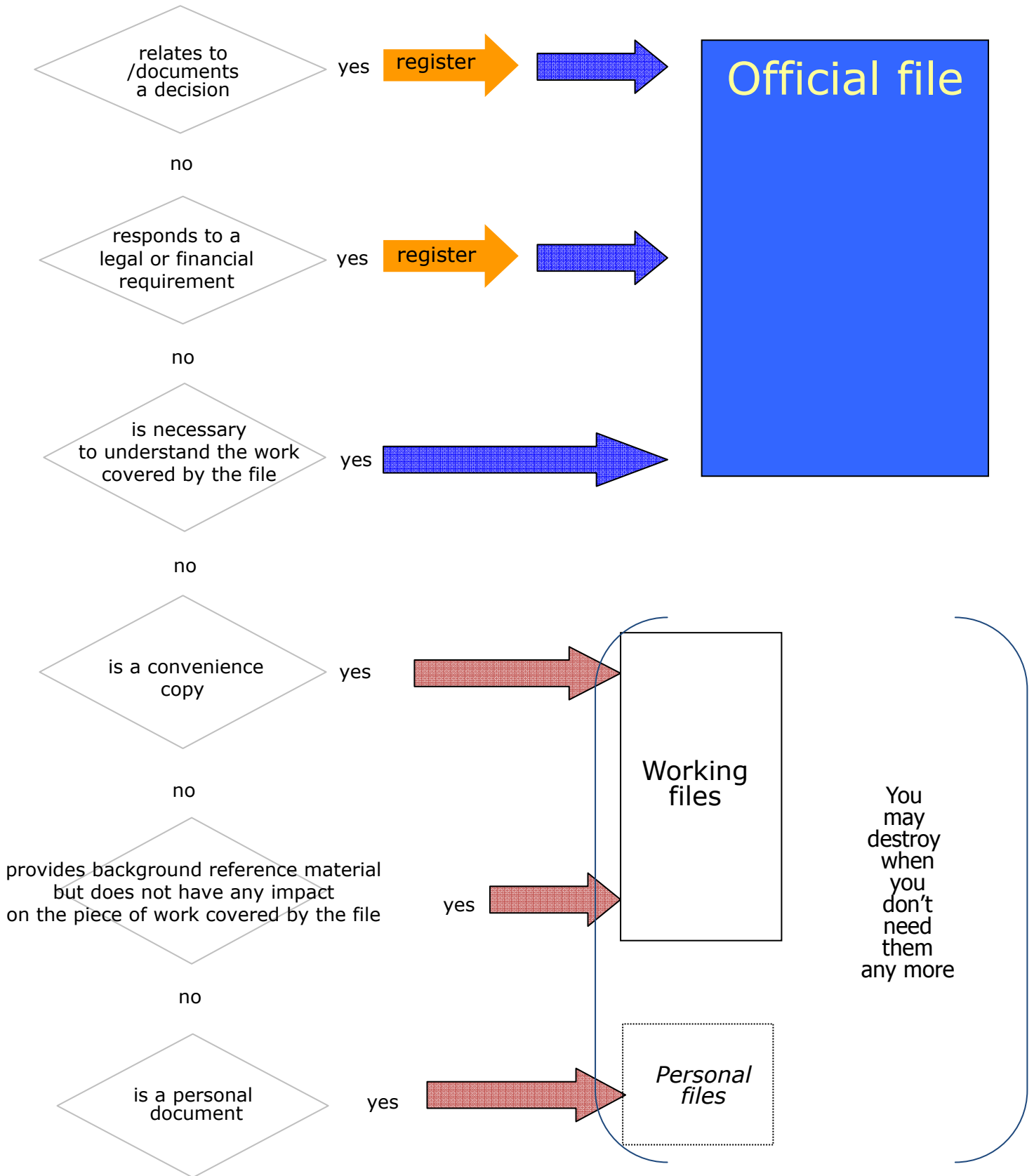
⇒ Official files that are complete and reliable give a guarantee of:

- increased efficiency within the unit by making it possible to retrieve all documents relating to a particular case quickly and easily by putting them into context.
- proper management of cases for the purposes of accountability.
- business continuity in the event of staff mobility: consulting the file makes it clear what has been done and what is still to be done.

⇒ Every document registered must be filed in an official file.

Official file and working file

Document ...



➤ 2.3.2. Value of official files

The official file provides justification, proof or information on a case. If correctly managed, it guarantees the effectiveness and relevance of work done.

⇒ For each case, at least one official file must be created by the Lead Department (or several official files if several departments share responsibility for different aspects of a single case).

⇒ The official file is characterised by the value of its functional, operational, legal information etc. and not by the type of document it contains or how it is organised.

⋮ Example:

⋮ An "Order Forms" file or a Chrono file (in which documents are simply organised in chronological order) cannot be an official file.

⇒ The official file follows the pace of development of the case: it is created when the case commences and closed when the case comes to an end.

Special exception: "Personnel management and human resources" files

DG HR, PMO and EPSO have sole authority to manage and retain the official files of Commission employees. Additionally, the DG's Human Resources Department manages the official files relating to the DG's specific personnel management policy:

⇒ Within the DG, a personnel management file can not give the name of a specific agent (for example, prohibition to have a "John SMITH" file).

⇒ The units should be avoiding whenever possible to create personnel management files. Though, if the units received approval from their DG to create files on the everyday management of human resources,

- Files must be kept securely (limited "file readers" in Ares for example).
- Files must be destroyed 4 years after their closure and shall in no case be transferred to the Historical Archives.
- At the time of the elimination of the file, the units must ask the DMO for procedures to be followed (including for unsolicited applications files).

2.4. LEAD DEPARTMENT RESPONSIBILITY

For each file, there is a "**Lead Department**" ("Chef de file") in which a member of staff designated as "**file manager**" is responsible for the day-to-day management of the file.

The Lead Department is responsible for the case, even if other units may be involved in ancillary tasks or providing assistance.

The responsibility for creation and retention of the file relating to a case lies with the Lead Department.

- ⇒ The Lead Department is responsible for:
 - **Creating** a new file when a case is opened.
 - **Managing** the file: the Lead Department on the case is responsible for filing each registered document in the corresponding official file.
 - **Closing** the file on conclusion of the case.
 - **Retaining** the file during the Administrative Retention Period (ARP) or storing it in the DG Central Archives (depending on the internal organisation as regards the retention of intermediate records).
 - Collaborating with the DMO on the first **review of files** and their **possible transfer to the Historical Archives**.

This work is performed directly or by delegation, depending on the procedure specific to the DG or department.

- ⇒ Each official file must be complete at all times and must be available for inspection and audit.

3. Creation of an official file

An official file must be constituted for each case falling within the remit of the DG or Department.

A new file must be created whenever a new case is opened i.e. when a registered document is not linked to a current case and therefore cannot be filed in a current file. We advise against creating a new file before having at least one document to file (too many created files remain empty), except in the case of serial files.

- ⇒ To simplify file creation and management, it is recommended that "**standard files**" be created wherever possible, with an indication of the "checklist" of documents that must be contained in the file (for call for tender procedures, for example, research projects, budgets, etc.).

A new official file must be created in **Ares**. The creation of a file involves filling out descriptive information (metadata) about the file

3.1. FILE METADATA

The creation of a new file calls for clear and precise identification including the following indications.

- 1) Heading for attachment to the filing plan
- 2) File codes: internal management code. ARES automatically allocates a unique code to each new file. DGs may also choose to give the file a code specific to the DG.
- 3) File name or title (designation): this must be clear and meaningful
- 4) Identification of the Lead Department, including successive Lead Departments where necessary
- 5) Date of creation.
- 6) Date of closure (is filled in when the case is completed)
- 7) File status: 4 possible status levels:
 - active (new documents can be added to the file)

- closed (no further documents can be added to the file)
 - transferred (to the Historical Archives)
 - destroyed (by the DG or the Historical Archives)
- 8) File content: comments on the file content.
- 9) Level of classification: assignment of the appropriate security level.
- 10) File category: category of the CRL the file belongs to.
- N.B.:** The minimum information required to create a file is: the title, the file code, the Lead Department and the heading for its attachment to the filing plan.
- By default, the file creation date is the date on which the file is loaded into the application.

3.2. FILE TITLE

The file title must be clear, meaningful and succinct:

- It should reflect the action and be sufficiently informative without the need to read the documents it contains.
 - It should simplify the task of filing documents.
 - It should indicate when the file is to be closed.
 - It serves as a search criterion.
- ⇒ It is a fundamental element that will be used to identify the file throughout its life cycle, including when it is transferred to the Historical Archives.
- ⇒ The choice of file title depends on the type of file.

➤ 3.2.1. Action file and serial file

Files may be of two types, depending on the nature of the work from which they arise.

1. - **Action files** arise from one-off or unique cases, the duration of which is not known in advance but for which the procedural action that will make it possible to close the case is clearly determined.

~ ~ ~ Examples of such actions:

- ~ ~ ~ Monitoring a research project
- ~ ~ ~ Call for tender procedure

- ⇒ Creation of an **action file** (or case): concerns a specific case, beginning and ending at a precise and clearly identifiable moment.

~ ~ ~ Examples of scopes:

- ~ ~ ~ Monitoring a research project: completed when the final report is presented and the final payment is made
- ~ ~ ~ Call for tender procedure: completed once the successful bidder has been chosen

2. - **Serial files** arise from work of a repetitive nature, the duration of which is generally linked to a calendar or budget year and which always proceeds in the same way.

~ ~ ~ Examples of recurrent works:

- ~ ~ ~ AMP (Annual Management Plan): a new AMP must be drawn up every year
- ~ ~ ~ Determination of a training programme: linked to a budget year

- ⇒ Creation of a **serial file**: repetitive in nature and must be open to specific identification to simplify the operations of closure and duplication of the structure for the next serial file.

➤ 3.2.2. Recommendations for a “good” file title

- **Action file title:** Compose a title that is explicit, as regards both the subject of the file and the action required on that subject.

🌀 Examples of action file titles:

🌀 Development of the manual on filing documents and files at the Commission"
🌀 Adoption of legislation on the validity of electronic documents"

- **Serial file title:** facilitate the distinction between action file and serial file by indicating the date (period covered) in the title of serial files.

🌀 Examples:

🌀 Development of a filing plan for the delegations ➔ Action file
🌀 Adoption of the Common Retention List (CRL) ➔ Action file
🌀 IT budget **2011** ➔ Serial file
🌀 Annual Management Plan **2011** ➔ Serial file

- Give the file title in French and English to facilitate searches in either language.

🌀 Example:

🌀 Annual Management Plan 2011 = Plan opérationnel d'activité 2011

- Do not use initials, acronyms or “Commission administrative jargon” which risk becoming incomprehensible over the passage of time. Remember that a file title will be used to identify the file throughout its life cycle, including when it is transferred to the Historical Archives. The title may be supplemented by using the “Comments” box in the file description sheet.

- For sub-files, repeat the file title in the following format:

File title: Sub-file title

🌀 Example:

🌀 File: Ares Implementation 2008
🌀 Sub-file: Ares Implementation 2008: Pilot phase
🌀 Sub-file: Ares Implementation 2008: DIGIT
🌀 Sub-file: Ares Implementation 2008: DG MARKT

- ➔ Check with the DMO if the DG has any specific rules applicable to file titles. If not, create a naming charter for the unit’s standard files.

Useful hint:

To check the relevance of a file title, check whether it is possible, on reading the title, to determine when the file should be closed (end of period or of procedure).

Examples:

➔ **Good titles:**

- Monitoring the formulation of archive schedules for the DGs
- Implementation of E-Domec rules 2011-2012

➔ **Poor titles:**

- Management of RESTREINT UE documents
- Conditions of file retention

3.3. FILE CODE

An **Ares file code** is automatically assigned when a new file is created: an alphanumeric code incremented automatically.

A **specific file code** can also be assigned: an internal management code intended to help users manage and find files easily. This code may be used, for example, as:

- an aid to filing: note of the file code made by file managers on their documents or as a footnote.
- search criterion for rapid file retrieval: use of a mnemonic file code.
- sort criterion to display files in Ares/Adonis.
- storing criterion for official paper files: files stored in file code order.
- criterion for organisation of the unit shared drive: file code used as folder.

Recommendations:

- Define a uniform file code and file naming system for the DG.
 - Create the shortest codes possible (32 characters maximum in Ares/NomCom).
 - Choose codes that are meaningful to users.
 - For a sub-file, repeat the code of the “parent” file.
- ⇒ Check with the DMO if the DG has any specific rules applicable to file codes. If not, create a coding charter for the unit’s files.
- ⇒ Where DGs do not have a specific rule for the definition of file codes, the SG recommends a specific file code structure for each DG.
- The file code may consist of three elements separated by a full stop (.), in the following format:

GROUP OF ACTIONS. ACTION. Year

Example:

RM-TRAINING. SECR2. 2011

File relating to the development of the “Secretaries level 2” training course, which is part of the records management (“e-Domec”) training campaigns.

- **Group of actions:** makes it possible to group together files relating to cases.
- **Action:** a meaningful alphanumeric element (initials, acronyms that have meaning for the user, etc.).
- **Year of reference:** year of the file’s creation (or year/period covered by serial files).

3.4. “COMMENTS” FIELD

Recommendation: this field should be used for:

- Providing details on the content.
- Managing composite files: files made up of documents registered in different registers (see below).
- Managing hybrid files (files made up of an electronic component and a supplementary paper component): Indicate the existence of a paper file and its location (reference to the storage plan).

3.5. ATTACHMENT OF FILES TO THE FILING PLAN

Filing a file involves choosing an organisation that ensures the best possible conditions of retention and access for managers and users.

All official electronic files must be attached to the filing plan.

- ⇒ They are filed under the appropriate heading of the filing plan: final-level heading of the filing plan specific to the DG.
- ⇒ **This operation is performed once, at the time of the file's creation.**

➤ 3.5.1. Filing plan of the Commission, the Executive Agencies (EAs) and the External Action Service (EEAS)

The **filing plan** provides for the intellectual organisation of the official files of the Commission, the executive agencies and the EEAS on the basis of their activities, so that the files can be easily retrieved. It is a hierarchical and logical structure in the form of a tree structure by theme:

- composed of a fixed number of headings relating to the activities and missions of the Commission, the EAs and the EEAS
- consisting of a hierarchy of several levels, from the most general to the most specific,
- identified by a title and a numeric code,

The filing plan consists of:

- the **common nomenclature: the first levels** are defined by the Secretariat-General.
- the **specific levels** : each Commission DG and department, EA and the EEAS must have a filing plan that represents their activities and is linked to the common nomenclature.

First level of the Nomenclature Commune:

01. Institution – Commission, Composition and EC mandate
02. Institutional questions and the future of the Union
03. Community economic and social domain
04. Citizenship and quality of life
05. International relations
06. Financing of community resources, resource management
07. Community legislation
08. Information and communication
09. Strategy, policy and coordination
10. Administration
12. External Action

The purpose of the filing plan is:

- to give a global overview of all the activities of each department;
- to ensure consistency of filing systems: uniform identification of files handled by teams;
- to structure the constitution of files and facilitate the filing of documents in files in a logical manner;
- to facilitate searches for files and documents;
- to improve the quality and continuity of file follow-up, especially in the event of a change of Lead Department or assignment of the case.

➤ **3.5.2. Rules for drawing up/modifying the filing plan**

The filing plan must be logical, simple and permanent: the best filing plan is the one based on the missions the department performs, not on its organisation chart.

The consistency of the filing plan is guaranteed by compliance with a common methodology in its drawing up and subsequent modification:

- Use the common nomenclature (first levels of the tree structure¹⁰)
- Identify the DG's activities using official descriptions, references, Intranet presentations, etc.
- Analyse the substance of files, identifying the activities and the types of document associated with them
- Identify the real and occasional users
- Group types of file by activity
- Construct the tree structure within each activity
- Organise the types of file, determine their identifiers and structure them internally
- Harmonise the language
- Determine and assign a filing code for headings

The filing plan is a structure for the organisation of information that must be stable but may need to be modified in the event of new activity ceasing or commencing.

It is not a tool that is set in stone: the evolution of the filing plan is the responsibility of the DG DMO and, where necessary, the DMO correspondent should submit a request, with supporting arguments, to the DMO.

➤ **3.5.3. Presentation of NomCom3**

NomCom3 is the IT system that handles the central management of the Commission filing plan.

It provides for the maintenance and consultation of the filing plan, in particular by integrating with other applications such as Ares.

When the filing plan is created, a description sheet for each heading is completed:

- Heading title: it must be explicit (clear), precise (describing the activity concerned) and unequivocal (there must be no room for confusion with the title of another heading).

¹⁰ The common nomenclature extends to the 3rd level for most headings: for certain headings, the common nomenclature extends to the 3rd level, for others it stops at the 2nd level.

- Description: application note presenting and illustrating the activity or mission of the DG.
- Comments: used to indicate whether the heading replaces another, has been moved, etc.
- Numeric code assigned automatically by NomCom3.
- Code specific to the DG (optional).
- Date of creation, assigned automatically by NomCom3.
- Date of activation: date on which the heading comes into use (assigned automatically by NomCom3 when the heading is activated).
- Date of freezing: should the activity no longer be part of the Commission's mandate, the corresponding theme heading in the filing plan should be frozen.
- Heading status: active (in use, new files can be associated with the heading), frozen (open files can still be managed, but no new files can be associated with the heading)
- Owner department
- Roles: distinction between 3 possible role types:
 - o Heading editors: authorised to modify a heading, create a sub-heading, create files and read the heading.
 - o File creators: authorised to create files and read the heading.
 - o Heading readers: authorised to read the heading.

➤ 3.5.4. Choice of the filing plan heading for new files

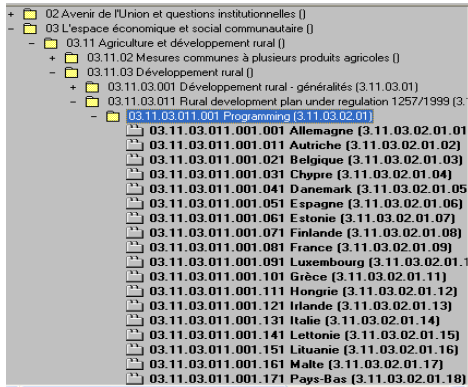
The operation of filing files is performed when the file is created.

- ⇒ A **heading** is one of the branches making up the filing plan. It represents an activity carried out by a DG or an equivalent department. It is used to group a set of files of the same type.
- ⇒ A **file** is a set of documents relating to a single **case**. Documents dealing with the same case are grouped together for reasons of evidence, justification or information and to guarantee efficient working. The file exists physically in electronic and/or paper form.

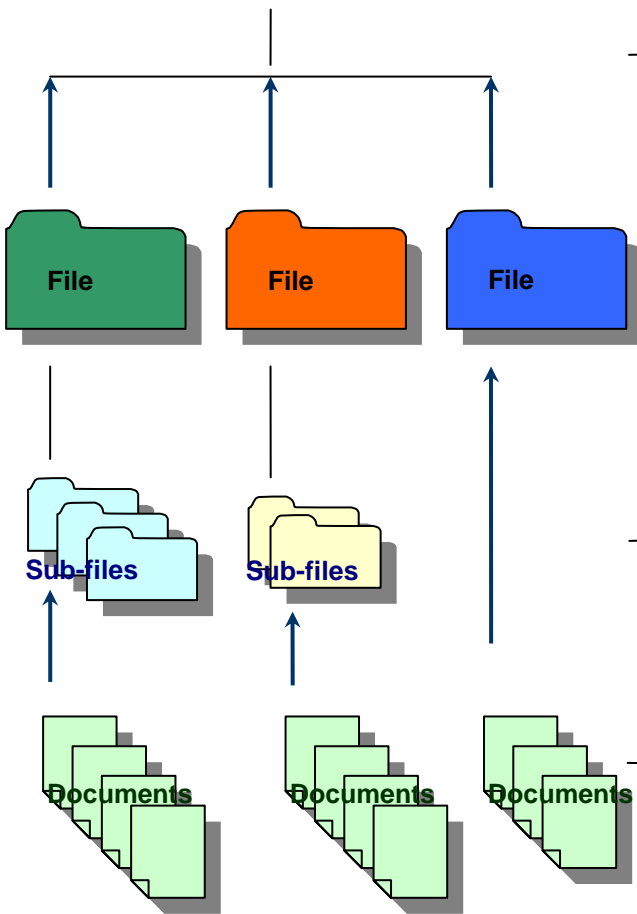
The creation of a file and its attachment to the filing plan of a DG or department is the responsibility of the Lead Department (Chef de file). In practice, the essential steps to be carried out are:

1. Consult the original version of the filing plan;
2. Identify the Directorate to which one belongs and examine the corresponding headings;
3. Choose the heading most relevant to the file to be created: a file may only be attached to a **single heading** in the filing plan. It corresponds to a precise case linked to a heading that covers a defined sector of activity;
4. Attach the file to the corresponding heading. It must be a final-level heading of the filing plan specific to the DG or department.

Headings, files and documents



Filing plan: composed of a hierarchy of headings



Filing of files under specific headings of the filing plan. A file may be linked to only one heading in the filing plan (final-level heading)

A file may be divided into sub-files to facilitate the organisation and consultation of documents

Filing documents in files or sub-files.

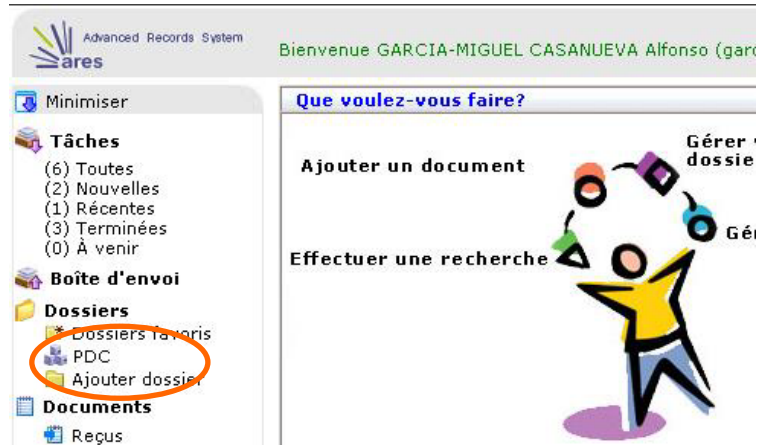
- If the file is divided into sub-files, the documents must be filed at sub-file level.
- A single document may be filed in one or more files.

⇒ A document is never filed directly in a heading of the filing plan but always in a file and the file is attached to a final-level heading in the filing plan.

Creation of a new file in Ares


Step n°1:

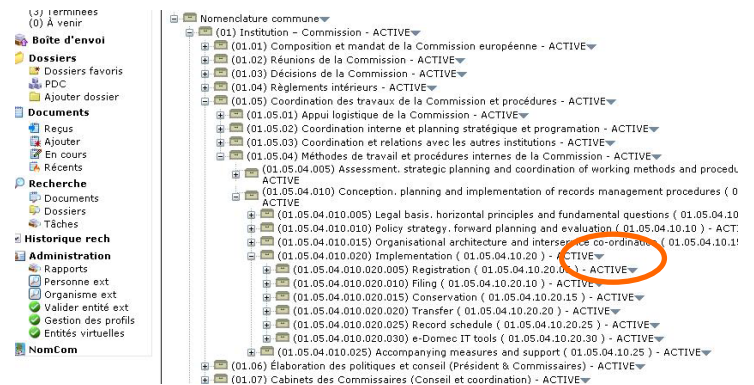
- Ares access screen
- Files menu
- To create a new file, click on "Add file"



Step n°2:

Display filing plan.

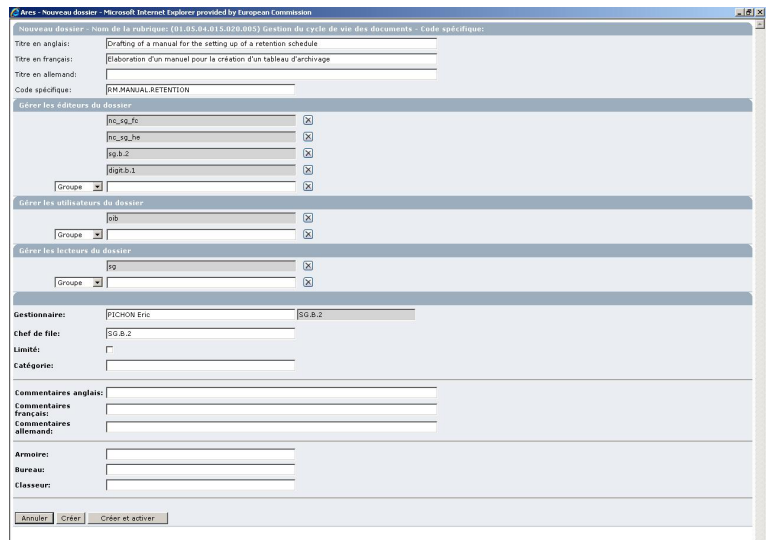
- Scroll down through tree structure to choose the filing plan heading
- Position the cursor on the  icon for the heading concerned
- Click on "Add file"



Step n°3:

Input the file description data:

1. File title and code
2. **Roles:** Management of access rights to the file
3. Indicate the Lead Department, the file manager, the file category and any useful comments



N.B.: To create a sub-file, simply select a file in the filing plan and click on **Add sub-file**.

4. Organisation of an official file

The following recommendations are designed to ensure correct file management:

- **Separate** official files from working files at the outset.
- **Organise** documents logically within the file (filing in chronological, procedural, themed order)
- **Divide** over-large files into several sub-files or files defined by criteria of date, actions, stages in the life of the case.
- **Create a table of contents** for easier understanding of the file content
- **Keep up to date** - file documents as soon as they are registered
- **Assign a specific file code** to each file and quote it on all documents associated with the file.
- **Eliminate** duplicates and documents received for information only.
- **Protect paper originals with evidential value:** store them in an official paper file and never remove documents from a file

4.1. THE OFFICIAL FILE MANAGEMENT TOOL: THE FILE LIST

The file list is managed via Ares. It contains the descriptions of each official file and is an everyday working tool that can be used to:

- draw up an inventory of the official files managed by the Commission;
- identify the Lead Department (chef de file) for each case;
- file documents in their corresponding file;
- enable searches for and access to files and documents;
- determine the retention period for each file;
- facilitate transfer to the Historical Archives.

To create a list of favourite files:

A list of “favourite” files can be created in Ares: preferred files can be added or deleted according to cases in progress.


Creation of a list of favourite files in Ares

Step n°1:

- File menu
- Favourite files
- "Search" tab
- Input search criteria

Step n°2:


⇒ Display the list of files selected

- Select the file to display in the list of favourite files by clicking on the  icon

Résultat de la recherche

| Code dossier | Code spécifique | Titre du dossier | Chef de file | Gestionnaire | Statut | Décimalisation |
|--------------|------------------|--|--------------|--------------|--------|----------------|
| 2009-AE9901 | IAS.TREN/001 | IAS Audit Report on IT Local Control - DG TREN (+ Follow-up) | sg.b.2 | | ACTIVE | 01.05.01.03C |
| 2009-AE9902 | APC.PERSONNEL | APC Personnel | sg.b.2 | | ACTIVE | 01.05.01.03C |
| 2009-AE9903 | AUDIT/002 | Audit follow-up methodology, reporting and policy | sg.b.2 | | ACTIVE | 01.05.01.03C |
| 2009-AE9904 | IAS.FISH/001 | IAS In-depth audit of DG FISH and quality review of IAC DG FISH (+ Follow-up) | sg.b.2 | | ACTIVE | 01.05.01.03C |
| 2009-AE9910 | IAS.RELEX/004 | IAS Audit on Handling of Classified Information and Communication among the Delegations and DG RELEX (+ Follow-up) | sg.b.2 | | ACTIVE | 01.05.01.03C |
| 2009-AE9911 | IAS.AIDCO/002 | IAS Audit Report on NGOs in DG AIDCO (+ Follow-up) | sg.b.2 | | ACTIVE | 01.05.01.03C |
| 2009-AE9940 | IAS.EU.LAW/001 | IAS Audit/Review of Monitoring the Implementation of EU Law | sg.b.2 | | ACTIVE | 01.05.01.03C |
| 2009-AE9942 | IAS.TREN/002 | IAS Audit Report of Financial Management and Financial Circuits in DG TREN (+ Follow-up) | sg.b.2 | | ACTIVE | 01.05.01.03C |
| 2009-AE9948 | IAS.ECHO/002 | IAS Audit of Non-Governmental Organisations in DG ECHO (+ Follow-up) | sg.b.2 | | ACTIVE | 01.05.01.03C |
| 2009-AE9949 | IAS.EUROSTAT/003 | IAS Follow-up Audit of ESTAT | sg.b.2 | | ACTIVE | 01.05.01.03C |

Step n°3:

- "My favourite files" tab: displays the list of favourite files
- To remove a file from the list of favourites, click on the  : Remove from favourites icon

Mes dossiers favoris

Trié par: Trié par decimatisation de rubrique | Trié par titre de dossier | Trié par document par date d'enregistrement

(01.05.04.010.020.030) (01.05.04.10.20.30)

- MH.TEST.FILE ACCESS TESTING: FILE
- EDOMEK.IMPL.IT ARES
- fdsgsfdgsdfg

(01.05.04.010.025.005) (01.05.04.10.25.05)

- ADYANTRAINSEC.2008 Cours avancés pour secrétaires
- Cours pour DMD

(03.01.01.001.001.001.001) (C.4.1.A.1.1)

- IMFC 2009 DOSSIER PER MEETING 2009

(05.01.02.020.010)

- MH.TEST.FAV Test sous-dossiers dans favoris

Actions

- Modification dossier
- Ajouter un document existant
- Ajouter un nouveau document
- Export contenu en PDF
- Export contenu en XLS
- Enlever des favoris
- Déplacer Dossier (Nomcom)
- Copier Dossier (Nomcom)
- Lier Dossier (Nomcom)
- Supprimer Dossier (Nomcom)
- Fermer Dossier (Nomcom)

4.2. INTERNAL STRUCTURE OF A FILE

Each unit or department is free to determine the organisation of documents within files, depending on the nature and progress of the case, but adherence to certain general principles is recommended.

➤ 4.2.1. General principles

The file must be organised in such a way as to facilitate consultation and understanding by someone who is not necessarily informed of the progress of the entire case:

- Adopt a common structure for all files arising from similar cases
- For complex and/or lengthy cases, divide the file into sub-files (procedural order, chronological order, etc.)
- Organise documents in hard copy files and sub-files in reverse chronological order (the most recent document first) to provide an instant view of the most recent actions taken.
- Organise reference and information documents separately in a working file (or in specific sub-files): documents containing information vital to an examination of the case but not strictly involved in the procedure (copies of documents, non-finalised versions of documents, collections of notes, technical reference material, copies of articles, telephone call logs, non-certifying e-mails, drafts, etc.).

This will make it easy to identify and eliminate them when the file is closed and transferred to intermediate records.

➤ 4.2.2. Creation of sub-files

When organising documents within the file, they can be divided into sub-files for ease of management and consultation.

- There is no limit on the number of sub-files
- Only one level of sub-file is authorised (no sub-sub-file)
- Sub-files may be created at any moment
- The main file may not be closed or transferred until all the sub-files have been closed.

⇒ It is often preferable to have several successive files of the same level rather than a file divided into sub-files. The file code ensures they are grouped together.

➤ 4.2.3. File composed of documents registered in different applications.

If a file is made up of documents registered and retained in different registers (Ares, CIS-Net, Sybil, Abac, etc.), it is essential to facilitate access to the information while obeying the rule of single registration of every official document.

⇒ Recommendation: the rules adopted should meet all administrative obligations but should also not unduly increase workload.

At present, the list of official files is managed exclusively in Ares. An indication must therefore be given in Ares/Adonis that the file contains documents registered in other applications:

- Either by giving the document references in the “Comments” heading of the file description sheet.

- Or by creating a working document listed and filed in Ares setting out all the documents and the application in which they are registered.

5. Multiple responsibility for a file

The official file is placed under the responsibility of a clearly identified Lead Department throughout its life cycle.

5.1. SHARED RESPONSIBILITY

Since the official file is the product of an activity, it may, like the activity, be shared between several units. This applies to instances where several units simultaneously or successively manage the same file, with each unit being responsible for different, complementary aspects of the case.

⋈ For example, responsibility for a single project shared between an operational unit and a financial unit.

In this instance, a single unit must act as the Lead Department (chef de file) with overall responsibility for following the case and providing coordination between the different departments involved.

In practice, there are two possibilities:

- Either a single file is created, that may be divided into sub-files in which each unit handles its own filing (sharing of roles in Ares)
- Or each unit creates its file and is responsible for the part of the case that concerns it. The unit draws up the list of the documents it retains and that must be accessible in the event of an audit.

⇒ In this instance, the DMO correspondents for each unit, or the DMO, are responsible for facilitating coordination between the departments:

- Identification of the Lead Department,
- Choice of a common title,
- Assignment of a file code,
- Attachment of the file to a heading in the filing plan,
- Retention of any supplementary paper file,
- Closure and consolidation of the file before its transfer to intermediate records.

5.2. TRANSFER OF RESPONSIBILITY

Transfer of responsibility is a physical and intellectual operation by which responsibility for the follow-up of a case shifts from one department to another. This applies to instances of reorganisation with transfer of responsibility for a single case.

The former Lead Department must provide the new Lead Department with all the information not merely on the substance of the case itself but also on management of the file:

- Composition of the file: electronic and/or paper file, file composed of documents registered in different registers, pending documents, etc.
- Location of the file: area and conditions of retention of the original documents.

6. Filing documents

Every registered document must be filed in an official file.

A document that has not been registered may also be filed in an official file. This may apply in particular to documents that have simply been saved (Ares), but which are useful to an understanding of the case: simple working documents, documents registered in specific registers and flagged to make them easier to find, etc.

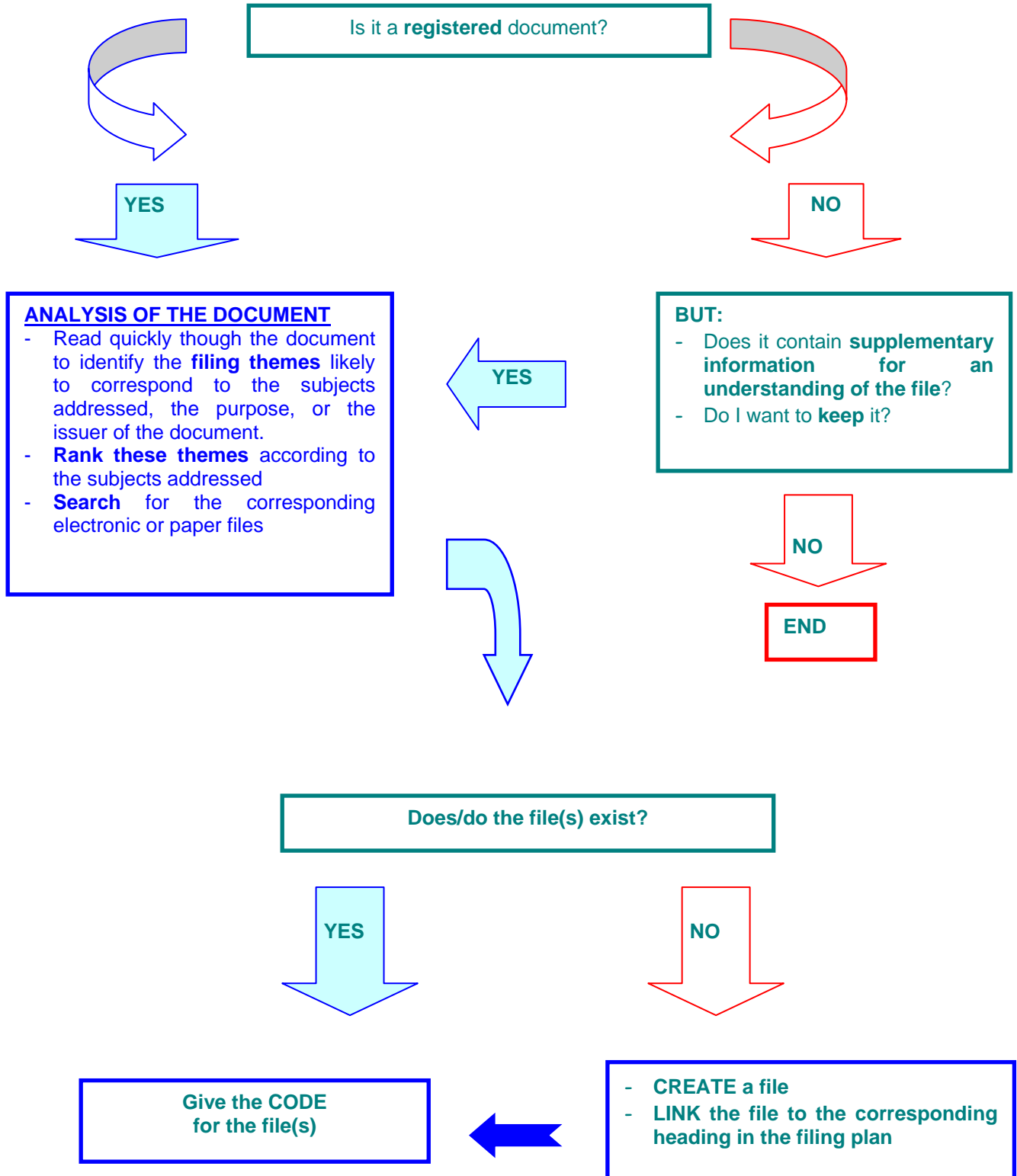
6.1. CHOOSING THE CORRECT FILE FOR FILING

Before filing a document in a file, an analysis must be carried out to determine which is the appropriate file.

The analysis may be conducted as follows:

| STAGES | | DESCRIPTION |
|--------|---|--|
| 1 | Define the filing themes of the document | Read quickly through the document to identify the filing plan themes likely to correspond to the subjects addressed, the purpose, or the issuer of the document. |
| 2 | Rank these themes according to the subjects addressed | Depending on the subjects addressed, select the main theme that characterises the document. |
| 3 | Search for the corresponding electronic or paper file(s) | A document may be filed in several files when the information in the document relates to several cases. |
| 4 | File the document | Indicate the code of the electronic file(s) in the encoding sheet |
| 5 | Store the document (original documents, classified documents, documents that cannot be digitised, etc.) | Note the file code on the paper document and store the document in the corresponding paper file. |

Analysis of a document to be filed

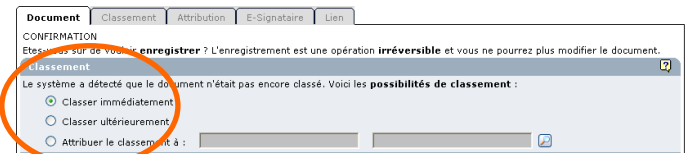


FILING A DOCUMENT IN ARES

Every registered document must be filed: A reminder message is displayed if a document has not yet been filed at the time of the registration request.

The document must be:

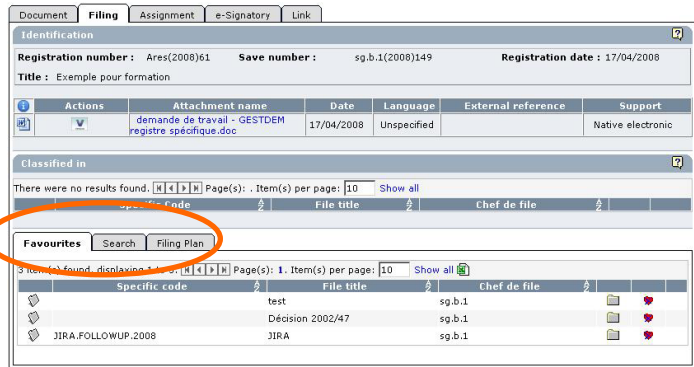
- Either filed immediately or subsequently (if in the possession of the Lead Department)
- Or assigned to the Lead Department for filing



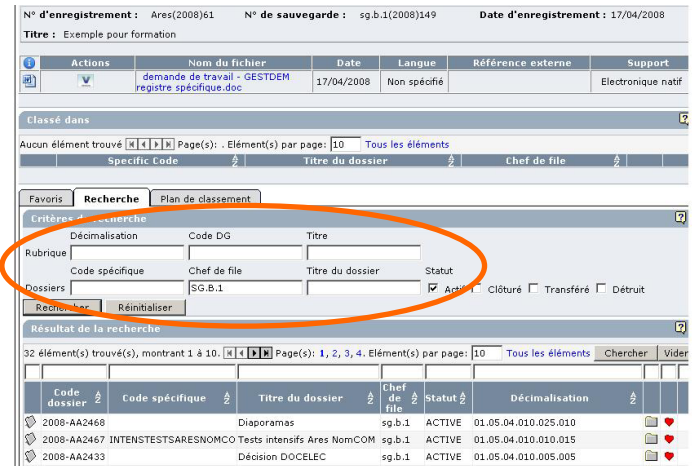
The "Filing" tab displays a summary of the document metadata.

3 options for filing:

- from the list of favourite files
- from a search of the file list
- from the filing plan tree structure



The "Search" function can be used to search the file list from the filing plan heading or file identification metadata (Code, Lead Department, Title)

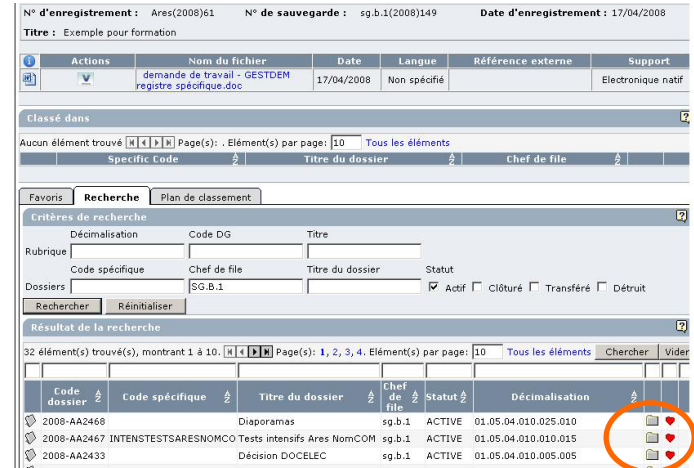


To select a file:

Click on the icon representing the file to file the document.

To add the file to the list of favourite files:

Click on the "heart" icon



- ⇒ **The choice of file for filing is fundamental:** filing a document in a file automatically assigns to it all the rules and procedures associated with that file:
- Retention period,
 - Authorisations for consultation,
 - Rules of elimination, etc.

6.2. ROLE OF THE FILE MANAGER

Filing, like registration, comes under the administrative responsibility of the Lead Department.

The file manager plays an essential role:

- ensuring that every registered document relating to the case for which he is responsible is filed in the correct file
- indicating to the person in charge of the filing operation in which file the document should be filed

- ⇒ A procedure must be established in the unit to define who files, and how; in practice, the file manager must pass the information on the file to be filed to the person responsible for filing in Ares.

V. MANAGEMENT OF CURRENT RECORDS

It is important that files be properly retained and preserved, whatever the medium (electronic and/or physical), throughout their life cycle in order to:

- ensure the physical protection of files necessary to the existence and proper functioning of the Commission;
- guarantee the continuity of file management throughout their life cycle: archiving of registration metadata, filing and retention;
- facilitate transparency and exercise of the right of access to documents;
- enable the opening of the Historical Archives of the Commission to the public after 30 years.

Each Directorate-General or equivalent department therefore assumes responsibility for the retention of files relating to its sphere of responsibility, irrespective of the medium (electronic and/or paper).

1. Electronic and/or paper retention?

Documents that have been registered and filed must be available in electronic format: in born-digital or digitised format.

- ⇒ In Ares, it is impossible to register a document without having attached the electronic version (except for "RESTREINT UE" documents or those with an "OLAF" or "COMP" marking).

It is essential to be familiar with the principles of validity of electronic documents in order to determine whether retention in electronic format is sufficient, or if the original also needs to be retained in paper form.

1.1. VALIDITY OF ELECTRONIC DOCUMENTS

The implementing rules relating to electronic and digitised documents (SEC(2009)1643, chapter III) specify an initial, non-exhaustive list of types of documents that may be retained exclusively in electronic form and do not require a signed original.

- ⇒ This list will evolve as the use of electronic signatures develops.

➤ 1.1.1. Principles of validity

An electronic records management system must offer the same guarantees, in terms of security and access, as those provided for the document management of physical (particularly paper-based) documents.

In evaluating the validity of electronic documents at the Commission, the following must be taken into account:

▪ **Circles of parties to electronic exchanges of documents:**

Circle 1: internal circle made up exclusively of the Commission and its Directorates-General and equivalent departments, which exchange electronically among themselves drawn up or received documents. The electronic identification of parties is performed by the ECAS system (or any other equivalent certified system).

Circle 2: circle made up of the Commission and partner administrations (other institutions, member States, national public administrations, entities with which the Commission has regular dealings), which electronically

exchange documents subject to mutual legal and IT standards.

Circle 3: open circle made up of the Commission and organisations, non-member States, commercial businesses, legal entities and citizens, which exchange documents via Internet or Extranet networks. An external person may be identified by the use of a simple electronic signature or by an authentication function of the IT application used, or continued exchanges.

▪ **Origin of electronic documents:**

- **“Born-digital” electronic documents:** drawn up or received in electronic format. Only “born-digital” electronic documents may be signed with an electronic signature.
- **Digitised documents:** all documents drawn up or received in paper form and registered must be digitised (subject to format or security constraints).

➤ **1.1.2. “Born-digital” electronic documents**

◆ **Documents requiring a signed original**

Only a small proportion of Commission documents require a signature as a substantial formality in order to be valid.

For certain exchanges, however, particularly within circle 3, an advanced electronic signature may be required.

Electronic signature: data in electronic form that serve as a method of authentication.

Advanced electronic signature: electronic signature that meets the following requirements:

- it is uniquely linked to the signatory,
- it identifies the signatory unequivocally and with certainty,
- it is created by means over which the signatory can exercise exclusive control,
- it is linked to data in such a way that any subsequent modification to the data is detectable.

⇒ **Types of electronic documents for which signature is a substantial formality:**

- Documents drawn up by the Commission: minutes and acts to be authenticated pursuant to articles 11 and 17 of the Commission’s Rules of procedure,
- Documents received by the Commission: tenders under public procurement procedures, grant agreements or decisions, declarations of expenditure, annual accounts, etc.

◆ Documents not requiring a signed original

These include the majority of administrative documents drawn up by the Commission. It must, however, be possible to duly identify the person from whom the document emanates and guarantee the integrity of the document's content and metadata. The requirements depend on the circle concerned and the level of formalism required by the field of activity or the procedure under way.

⇒ Examples of documents drawn up by the Commission not requiring a signed original:

- Internal administrative procedures: relations between the administration and its officials, etc.
- Documents relating to the internal or inter-institutional legislative process: preparatory documents, notes, studies and reports to evaluate the content or consequences of legislation.
- Information on calls for tender or calls for proposals
- Documents relating to the internal operation of a Directorate-General or a department: minutes of meetings, etc.
- Documents of an administrative, financial or budget discipline nature, for external communication.

⇒ Examples of documents received by the Commission not requiring a signed original:

- Exchanges of information with member States and other institutions and bodies under Community policies.
- Requests by citizens for access to documents;
- Complaints about breaches of Community law;
- Submission of applications.
- Supporting documents for the submission of grant applications.
- Statistical and financial data.

➤ 1.1.3. Digitised documents

Registered documents in a non-electronic medium must be digitised in a format which offers guarantees of permanence, legibility over time and ease of access such as PDF or PDF/A (PDF for archives) or TIFF.

The department carrying out the digitisation must put in place quality control to check that the scanned document corresponds to the original. As a precaution, the original version of all digitised documents must be kept for a period of at least six months so that the necessary checks and corrections can be carried out.

⇒ Retention of the original paper document

The digitisation tools currently in use at the Commission do not make it possible to certify that a scanned document corresponds to its original. In the case of documents for which signature is a substantial formality, the original must be retained in an official paper file.

Examples:

Contracts

Invoices

Expense claims

1.2. MANAGEMENT OF A HYBRID FILE (ELECTRONIC AND PAPER)

A hybrid file is a file made up of electronic documents that have been registered and are available via the official electronic file and paper documents paper stored in a supplementary official paper file.

In a certain number of cases, retention of registered documents in their physical medium of origin remains mandatory:

- documents for which only the paper original has evidential value: documents required for control or audit purposes.
- documents partially digitised or not digitised and not attached to the Ares sheet:
 - classified documents
 - documents on media or in formats that cannot be digitised,
 - voluminous documents of which only the first page has been scanned
- documents that have not had the quality of their digitisation checked.

These documents must be stored in an official paper file supplementary to the official electronic file.

Two possible instances:

- Either the official file is made up of both electronic documents and original documents that must be in paper form: documents stored in a paper file noted in the electronic file description sheet with reference to the location of the paper file.
- Or the official file is exclusively in paper form: creation of a description sheet in the list of official files with reference to the location of the paper file.

- ⇒ To guarantee that the electronic file and paper file correspond:
- note the existence of the paper file under the “Comment” heading of the file description sheet.
 - on the paper file label, note at the very least the same title and code as the electronic file, the date of creation and the Lead Department.
 - identify the official nature of the file by a clear reference or a colour code (e.g. a coloured sticker).

Practical tip:

To guarantee that the official paper file will be identified in the same way as the official electronic file, the simplest solution is for this file to be created by the DMO correspondent at the same time as the electronic file and handed directly to the file manager if (s)he retains the paper file in her/his office.

2. Retention sites for official paper files

2.1. FILING AND STORING

A distinction is made between:

- **Filing:** an **intellectual** operation to assign a filing code to documents = association of a document with one or more files.
- **Storing:** a **physical** operation to store documents in a file, whether in paper form (storage in files and cabinets) or in IT form (storage on shared discs, in databases, on a web server, etc.).

Filing and storage must be:

- simple: easy to understand;
- rapid: so that documents can be stored and retrieved quickly;
- reliable: to avoid filing and storing errors;
- secure: a document is always stored in a single area;
- flexible: can be extended without difficulty or disruption;
- cost effective in terms of time, equipment and space: rational management of storage areas.

Each DG or department is responsible for ensuring the physical protection of the files within its sphere of responsibility until their transfer to the Historical Archives Service.

Official paper files may be retained in different locations during their life cycle.

| LIFE CYCLE | FREQUENCY OF CONSULTATION | STORAGE LOCATION |
|---|---|--|
| Current records Files corresponding to current cases | Consulted very frequently (e.g. daily, weekly). | Department files: official files are held centrally in the department or in the file manager's office |
| Intermediate records Closed files retained for legal or administrative inspections | Consulted less frequently (e.g. monthly) | DG central archives repository or specific locations in Lead Departments. |
| Definitive archives Closed files retained to constitute the institution's collective memory | Consulted occasionally | Historical Archives: archives are retained in repositories managed by the Historical Archives Service. |

2.2. UNIT STORAGE PLAN

Recommendations:

- To guarantee secure conditions for the retention of official paper files, these should be held in a location central to the unit or DG. In which case, file managers should keep only working files and/or copies of original files in their office, as necessary.
- If the original files are held in the unit, a common **storage plan** for the unit should be adopted, indicating the precise location of files.

The storage plan is a practical instrument that defines the allocation of responsibilities for the physical archiving of documents, how documents are organised in the files and the criteria for the physical location of archives, as well as the form of storage adopted according to the type of file (alphabetic, numerical, chronological, by subject, etc.).

The storage plan, like the filing plan, applies to all documents in paper and/or electronic form. It is the responsibility of units and related to their internal organisation.

2.3. ORGANISATION OF DOCUMENTS IN A FILE

Within their electronic file, the documents may be organised:

- either directly at file level;
- or into sub-files.

Within their paper file, the documents may be organised:

- by chronological order of arrival.
- by alphabetic order of authors or of title.
- in numerical order: assigned a number at the time of registration.
- by subject or procedure: filing according to the purpose of the document according to a predetermined hierarchy that is reflected in the organisation of the file: division of the subject into sub-themes represented by sub-files.

2.4. STORING DOCUMENTS FILED IN SEVERAL FILES

If a document has been filed in several files, the original document must be stored in the paper file with the longest retention period under the rules of the Common Retention List.

The other files contain only a copy of the document with a reference to the location of the original.

2.5. ORGANISATION OF THE UNIT SHARED DRIVE

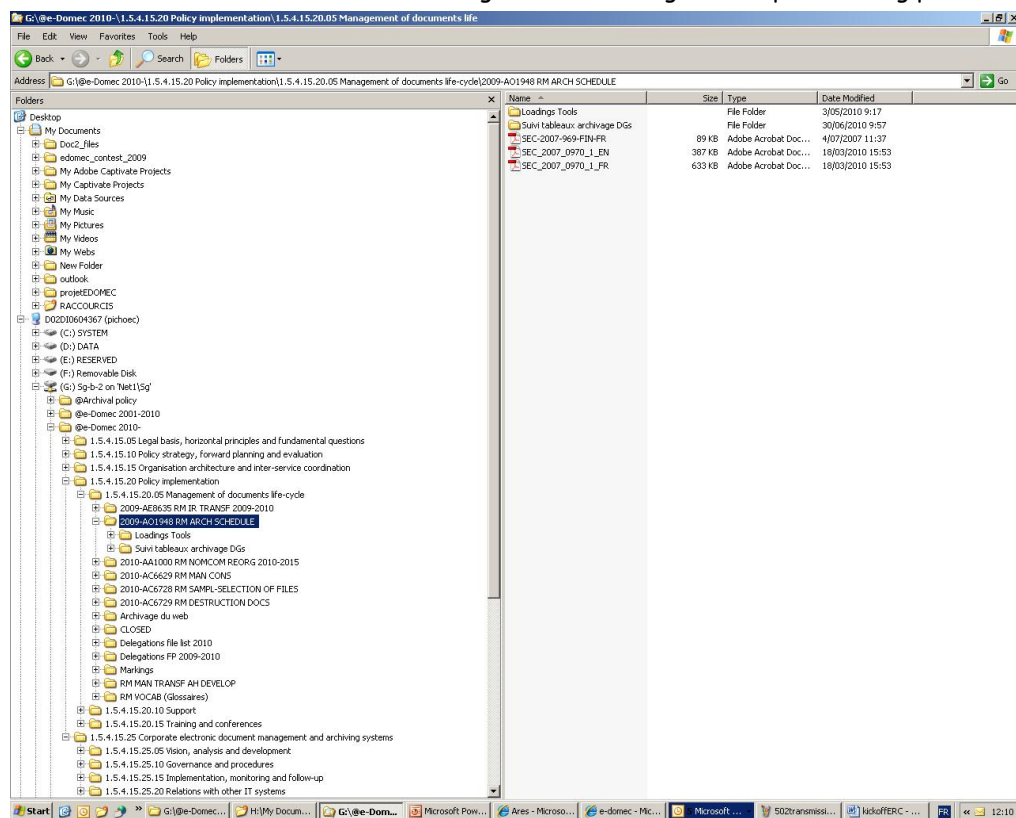
The unit common hard drive or shared hard drive is merely a working area in which a set of information in electronic format can be centrally stored and shared.

➡ The fact of storing documents on the unit shared drive in no way affects the fundamental obligation to register the document.

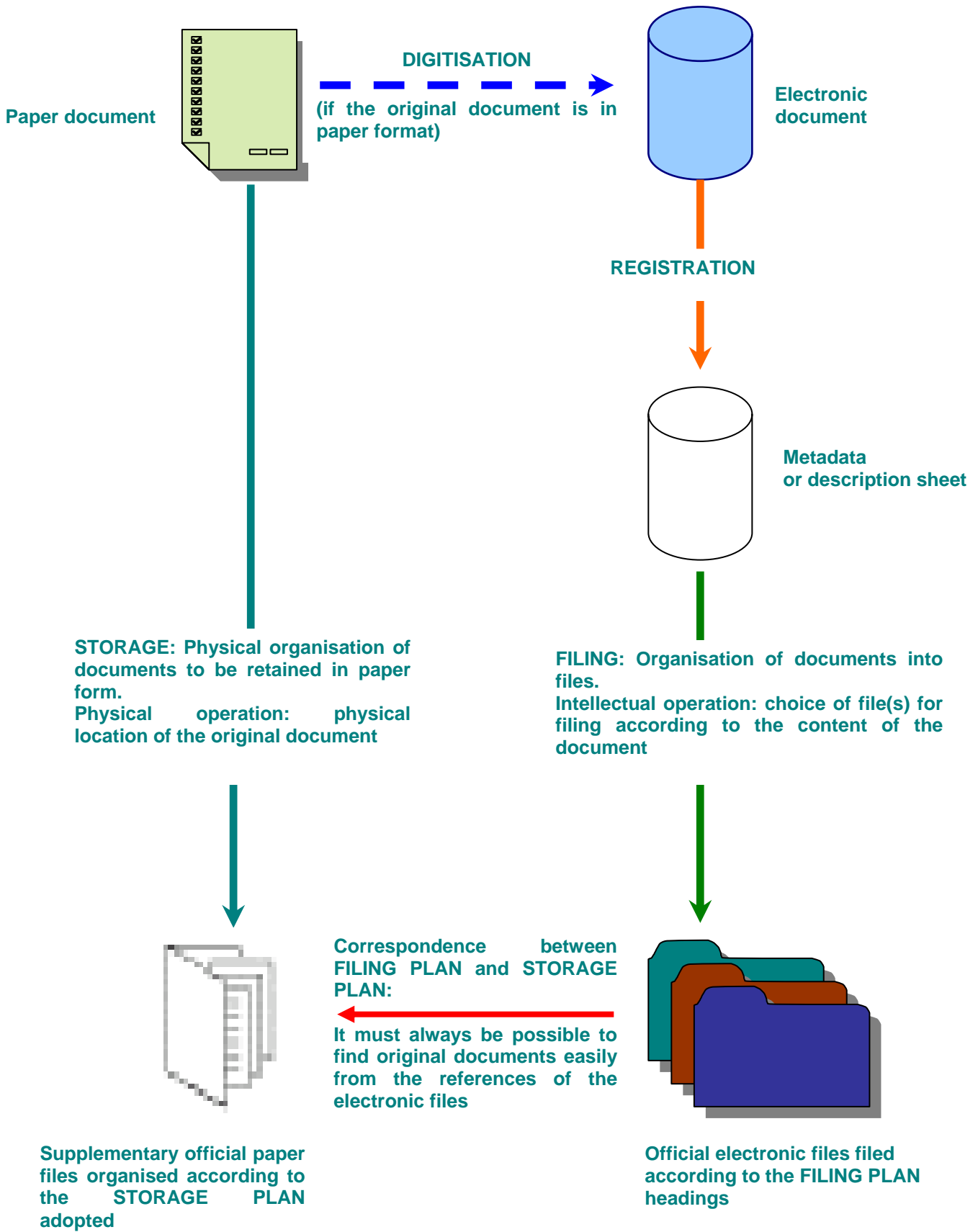
For ease of use, the shared drive should be organised in accordance with a simplified filing plan, to ensure that information is organised in one way only.

Example:

Tree structure of a common hard drive organised according to a simplified filing plan:



Filing and storage of documents



3. Access to attachments and files

Different search possibilities are offered to facilitate as far as possible the search for description sheets and hence access to documents.

Access to electronic files and documents is controlled by IT systems and applications.

3.1. SEARCHING FOR DOCUMENTS/FILES IN ARES

A number of different search possibilities are offered in **Ares** to facilitate, as far as possible, the search for documents, files or tasks.

- **Document search:**
 - **Full text search:** performs a search of both the metadata describing the attached electronic files and of their content (search engine function also available as a search box on each screen).
 - **Search criteria:** used to combine several search criteria at the level of Documents, Filing, Assignments, Attachments, Security.
 - It is also possible to combine a full text search and a search by criteria.
- **Ares/Adonis:** enables a search to be carried out on Adonis and/or Ares documents
- **Tasks:** search by addressee or assignor of a task, with the option to refine the search by date criteria.
- **File search:** may be conducted by means of a simple search or by browsing the filing plan.

3.2. CONSULTATION AND BORROWING OF OFFICIAL PAPER FILES

Precise rules must be laid down for the internal consultation or borrowing of documents. In particular, the information must be formally registered in a log or IT application. The following details are required:

- File code
- Number of physical items and description
- Requester's name, job, department, telephone number, etc.
- Date of internal consultation or borrowing
- Borrowing period or return date

Those responsible for the file must ensure that:

- the requester is authorised to consult the file
- the borrowing concerns a file and not a document: a document must never be removed from a file
- confidentiality standards are met
- appropriate measures are taken for the physical protection of the material

Internal borrowings must be checked at the end of the normal borrowing period to ensure that the file is returned.

The physical condition of the file must be checked at the end of the internal consultation or borrowing period.

Practical tip:

If the files are held in the file managers' office, it may help to keep trace of file borrowings by attaching a form to filing cabinets so that each borrower can identify himself, indicate which file has been borrowed and when it is due for return.

4. Public access to documents

4.1. BASIC RULE

Registering a document does not mean that it automatically becomes public and while any document that may potentially be retained by the Commission may, in principle, be consulted by any citizen (see Article 255 of the Treaty of Amsterdam and Decision 001/937), this is subject to a request for access to the document to be duly examined by the competent departments of the Commission.

4.2. EXCEPTIONS

Certain documents may be withheld from public access on the basis of specific exceptions, in instances where disclosure could be prejudicial to:

- public interest (public security, defence, military affairs, international relations, or the policies of the Community or one of its members)
- the commercial interests of an individual or organisation, legal action, legal counsel, or inspections, investigations and audits
- the Commission's decision-making processes, in instances where a decision has not yet been taken or when opinions are given for internal purposes or
- as part of preliminary deliberations or for consultations within the Commission

VI. CLOSURE AND RETENTION OF INTERMEDIATE RECORDS

The retention of Commission files is governed by:

- Decision 2002/47 - article 6 of the annex
- Rules of retention – SEC (2009)1643 – chapter II.4
- The Common Retention List – SEC (2007) 970

The rules of file retention are intended to guarantee:

- the protection of files over time: determination of retention periods,
- the clear definition of roles and responsibilities in terms of retention,
- the definition of strict procedures for the elimination of documents or files.
- the physical protection of files: rational management of physical and/or electronic storage areas.

1. A fundamental action: closing files

Every official file must be closed. As soon as a file is created, it should already be clear what procedural act will be required to consider that the case is completed and to close the corresponding file.

The value of a file varies according to its age. There are two distinct phases in the use of a single file.

- **Current files** containing documents and/or information consulted daily or frequently. The physical responsibility for retention of the file lies with the Lead Department.
- **Closed files** that need to be retained for administrative or legal reasons.

Closure is a fundamental operation:

- Closure implies a verification of the file: certification by the Lead Department that the case has been correctly dealt with and that, as a result, the file is complete.
- A closed file can no longer be modified: no documents can be removed from it or new documents filed on it (apart from certain exceptions).

The retention period determined by the **Common Retention List (CRL)** runs from the date of closure of the file.

1.1. PROCEDURE FOR FILE CLOSURE

➤ 1.1.1. Deadline for closure

The closure of a file must take place once all actions triggered by the case are completed and when no further document needs to be created or added to the file.

Recommendation:

In practice, a file should not be closed as soon as a case is completed, but only after a minimum period of six months to be sure that all relevant documents have been correctly processed.

- ⇒ Check the file list, at least on an annual basis, to close files corresponding to completed cases and organise their transfer to intermediate records.

➤ **1.1.2. Rules of closure**

A file must be checked before it is closed, since a file retained for the long term without any preliminary review or reorganisation can result in extended information search time.

This operation must be carried out by the Lead Department (chef de file). It is essential, in that it focuses on the content of the file and will not be repeated at a later date.

Before any file is closed, therefore, it is essential to:

- Check that all the important documents have indeed been registered and filed in the file. If necessary, there is still time to put right any errors.
- Weed the file: remove information and working documents of no further use. For the electronic file, this involves analysing and possibly deleting any documents that have simply been saved, and not registered.
- Complete the file metadata if necessary: indicate in particular the retention media and their physical location (storage area for paper files, IT applications for hybrid electronic files).
- Consolidate the file: unite the different parts of a single file dealt with by different units (for cases dealt with by an operational unit and a financial unit, for example).
- Process classified documents: check the documents and declassify if necessary.

Special case:

- **File made up of sub-files:** remember to close each sub-file as each aspect of the case is completed.
Remember to close the file itself when all the sub-files it contains are closed.

Recommendation:

For hybrid files (electronic and paper), not only must the electronic file be closed in Ares (Adonis for oldest files) but the paper file must also be closed

- **Electronic file:** close the file in via NomCom3 for Ares (or in Adonis for oldest files)
- **Supplementary paper file:** Facilitate the identification of closed paper files by stamping the paper file and using a labelling system in a different colour.

➤ 1.1.3. Date of closure

Irrespective of the moment the file is closed, the “date of closure” will be the date of the most recent document filed in the file.

If a file is reopened for the filing of new documents, the date of closure will change only if the new documents filed carry a later date.

➤ 1.1.4. Reopening a closed file

The reopening of a closed file is possible but should be restricted to very limited and specific instances, for example to file a document not filed or not received at time of the file’s closure.

If, however, a new case is launched as a result of a main case (legal recourse, for example, or an investigation for fraud), the recommended procedure is to open a new file following on from the main file. The file serving as the basis for the second case is considered to be on “legal hold” and post-ARP action cannot be carried out until the second file is finalised.

⇒ Remember to inform the DMO if a closed file is reopened.

1.2. ORGANISATION OF INTERMEDIATE RECORDS

If intermediate records are retained centrally by the DG, closed files must be transferred from the Lead Department to the DG’s Central Archives Department.

If there is no Central Archives Department, the Lead Department must guarantee the retention of the closed file throughout its ARP (Administrative Retention Period).

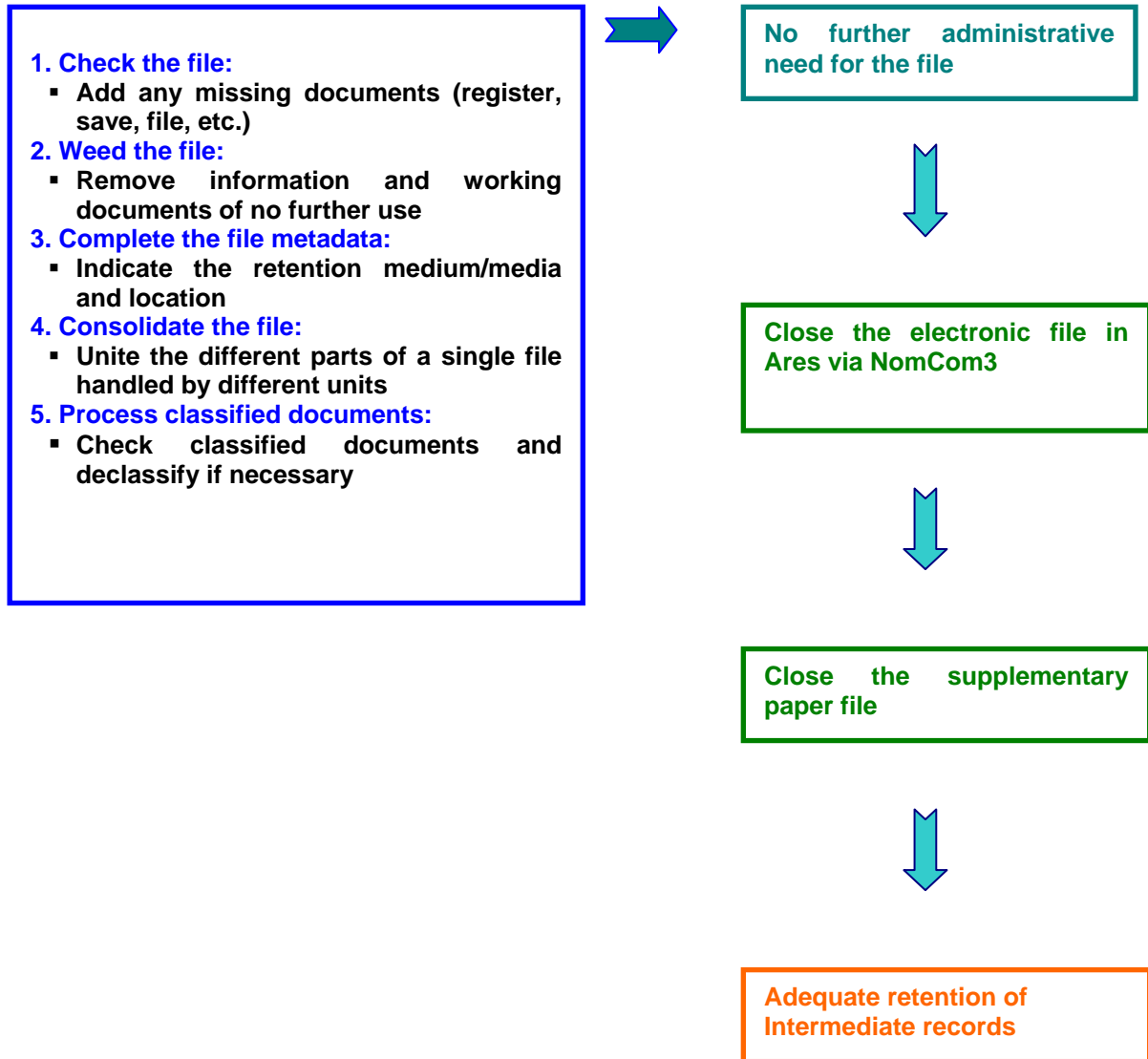
⇒ Consult the DMO on the procedure applied within the DG for the retention of intermediate records.

⇒ For hybrid or electronic files, a procedure for automatic transfer between systems is under development.

⇒ The procedure currently applicable (subject to specific instructions from the DMO) is:

- Close the electronic file in Ares (via NomCom3) and leave it in the IT application in which it was registered until the new procedure is in place.
- In the case of a hybrid file, do not organise a partial transfer of the paper component to the DG’s Central Archives but retain the entire file in the unit until the new procedure is in place.

Operations to be carried out in order to close a file



2. Retention procedures

2.1. OBJECTIVES

Archives are all those documents, regardless of their form and physical medium, registered and kept in files, which the European Commission must retain either for a limited period or permanently.

Files created and held by the Commission must be subject to regular appraisal in order to:

- eliminate records of no further value;
- transfer to the Historical Archives Service only the types of files set out in the Common Retention List (CRL):
- guarantee adequate retention in the Historical Archives of records of permanent value.

To do so requires the ability to:

- determine the file retention period;
- identify responsibilities for the retention, review and elimination of archive files;
- identify closed files for transfer to the Historical Archives or to be destroyed in accordance with the Common Retention List;
- proceed to the elimination of certain documents as part of an administrative elimination procedure (laid down by the CRL in these particular instances);
- ensure rational management of paper and electronic storage infrastructure and areas.

Precise details of retention periods for particular archive series and the administrative practices to be followed can be found in the DG's archive schedule.

2.2. THE COMMON RETENTION LIST

➤ 2.2.1. Objectives of the CRL

The **Common Retention List (CRL)** is a regulatory instrument defining the period and conditions for retention of the Commission's official files.

The CRL:

- identifies the different types of file created and held by the DG/ Departments;
- determines the retention period for each type of file in the light of its administrative usefulness to departments, of legal obligations and of its potential historical value;
- determines the ARP (Administrative Retention Period) for each type of file, i.e. the number of years the file must be retained by the DG/Department. The retention period runs from the date of closure of the file;
- indicates the post-ARP action to be carried out by the DG/ Department at the end of the file's ARP: transfer to the Historical Archives, sampling/selection, elimination;
- determines the ultimate fate of files transferred to the Historical Archives: permanent retention or second review by the Historical Archives Service.



The retention period of a file is determined by:

- its Administrative Retention Period (ARP): the period of its retention in intermediate records by the DG
- the action applicable at the end of the ARP (post-ARP action or first review)
- if necessary, the action applicable after transfer to the Historical Archives Service (post-THA action).

The Common Retention List was adopted and published by Secretariat-General in July 2007 (SEC(2007) 970):

- Its application by all Directorates-General and equivalent departments is **mandatory** for all files created under the e-Domec rules, irrespective of their medium (paper, electronic or hybrid).
- It may be applied by the DG/Department, on a voluntary basis, to closed files not constituted under e-Domec rules.
- It may be supplemented by **Specific Retention Lists (SRL)** at DG/Department level for series of files specific to the DG/Department and not covered by the CRL. In this instance, the SRL must have been adopted within six months of publication of the CRL.

N.B.: only the PMO has a Specific Retention List.

➤ 2.2.2. Structure of the CRL

The Common Retention List is presented in the form of a management table indicating the metadata for retention by major type of file.

| CATÉGORIES DE DOSSIERS | | DESCRIPTION | DUA (Duis. Usages Administratifs) | SORT FINAL | | CHEF de FILE CONSERVATION | OBSERVATIONS |
|--|---|---|-----------------------------------|---|--|--|--------------|
| | | | | ACTION POST-DUA/ PREMIER TRI: TAH, Transfert aux Archives Historiques, ECHISEL, Eclaircissage, ctoiw, Sévices | ACTION POST-TRANSFERT AUX ARCHIVES HISTORIQUES: CP, Conservation permanente, 2ème TRI, Diversité Tri | | |
| QUESTIONS INSTITUTIONNELLES ET DE GOUVERNANCE | | | | | | | |
| 1.1 | Le futur de l'UE | Travaux de réflexion sur le futur de l'UE, ses compétences, moyens d'action, réajustement vers un approfondissement... | | TAH | CP | SG, dossiers de coordination | |
| 1.2 | Reforme des Traités de l'UE | Travaux menant à la réforme des Traités fondamentaux de l'UE: travaux de réflexion (dont <i>casus</i> , Convention européenne...), négociation (CIG), rédaction, signature, ratification et entrée en vigueur | 5 ans | ECHISEL | 2ème TRI | DG, dossiers de contribution | |
| 1.3 | Gouvernance européenne | Adoption et coordination de la mise en oeuvre de règles en faveur de la Gouvernance européenne (better regulation, impact assessment, évaluation, simplification, prise en compte du principe de subsidiarité, de proportionnalité...) ainsi que suivi du respect de celles-ci (rapports annuels...) | 5 ans | TAH ECHISEL | CP 2ème TRI | SG, BUDG, ENTR, dossiers de coordination DG, dossiers de contribution | |
| 1.4 | Multilinguisme | Adoption et coordination de la mise en oeuvre de règles en faveur du multilinguisme par la Commission européenne (traduction, interprétation...) | 5 ans | TAH | CP | SG, DGT, SCIC | |
| 1.5 | Règlement intérieur de la Commission | Modification et règles d'application (circulaires, notes, suiv...) du règlement intérieur de la Commission | 5 ans | TAH | CP | SG, ADMIN | |
| STRATÉGIE & COORDINATION | | | | | | | |
| 2.1 | Programmation stratégique & Planification (SPP) | Dans le respect des orientations politiques définies par son président, la Commission fixe ses objectifs stratégiques pluriannuels et sa stratégie politique annuelle, en vertu desquels elle adopte son programme de travail ainsi que l'avant-projet de budget pour l'année suivante (Art. 2 Prg. Intérieur de la Commission) | | | | | |
| 2.11 | Programme politique de la Commission (pluriannuel) | Dans le respect des orientations politiques définies par son président, la Commission fixe ses objectifs stratégiques pluriannuels | | | | | |
| 2.12 | ABM (Activity-Based Management) | La gestion par activités -un des piliers de la réforme approuvée par la Commission en mars 2009- consiste à mener parallèlement la prise de décisions sur les priorités politiques et sur les ressources correspondantes à tous les niveaux de l'organisation. Il s'agit ainsi d'affecter les ressources aux priorités politiques | | TAH | CP | SG, dossier de coordination | |
| 2.13 | Stratégie politique annuelle (SPA) / Annual Policy Strategy (APS) | La SPA fournit les orientations en matière politique et de ressources pour l'avant-projet de budget, de même que pour le Programme de travail annuel de la Commission et la programmation opérationnelle (Plans de gestion annuels des DG) | 2 ans | | | | |
| 2.14 | Programme de travail annuel de la Commission (PTA) | Adopté par le Collège, il définit des mesures concrètes et des initiatives de nature législative, réglementaire, financière et les priorités de la SPA, en tenant | | ECHISEL | 2ème TRI | Toutes les DG, dossiers de contribution | |

- 1) **File Types:** The types of files make it possible to identify files relating to the same type of actions, questions or procedures. They are divided into 12 main types subdivided into sub-types:
 - Institutional and governance issues
 - Strategy and coordination
 - Commission decision-making
 - EU financial system and the budget
 - Policy development
 - Implementation of policies and legislation
 - Programmes, projects and grants
 - International activities and enlargement
 - Transparency, information, communication and relations with citizens
 - Monitoring the application of Community law
 - Legal proceedings
 - Administration

- 2) **Description:** General description of file content: introductory comments on the kind of files concerned by each type of file.

- 3) **ARP (Administrative Retention Period)** = period (number of years) during which the DG/Department is required to retain a file in the light of its administrative usefulness, of any associated legal obligations and of its potential historical value. The ARP runs from the date of closure of file.

- 4) **Post-ARP Action or First Review** = action to be carried out by the DG on expiry of the ARP:
 - **THA:** Transfer to the Commission's Historical Archives Service.
 - **SAM/SEL** = Sampling and/or Selection
 - **Sampling:** Method of appraisal whereby, on the basis of objective criteria, a representative portion of files for retention is chosen from a body of files too large to be retained in its entirety.
 - **Selection:** Appraisal of a body of files for elimination in order to retain certain files on the basis of subjective criteria (importance, media impact).
 - **EL** = Elimination: physical destruction of files

- 5) **Action Following Transfer to the Historical Archives:**
 - **PP** = Permanent preservation
 - **2nd REVIEW:** A second appraisal, carried out by the Historical Archives Service, of the historical value of files to decide whether they should be permanently retained or eliminated.

- 6) **Lead Department for Preservation:** Indication of the DG or DGs using this type of file and responsible for their retention.

- 7) **Observations:** Elements to be taken into consideration by the DG as regards file retention.

2.3. THE ARCHIVE SCHEDULE

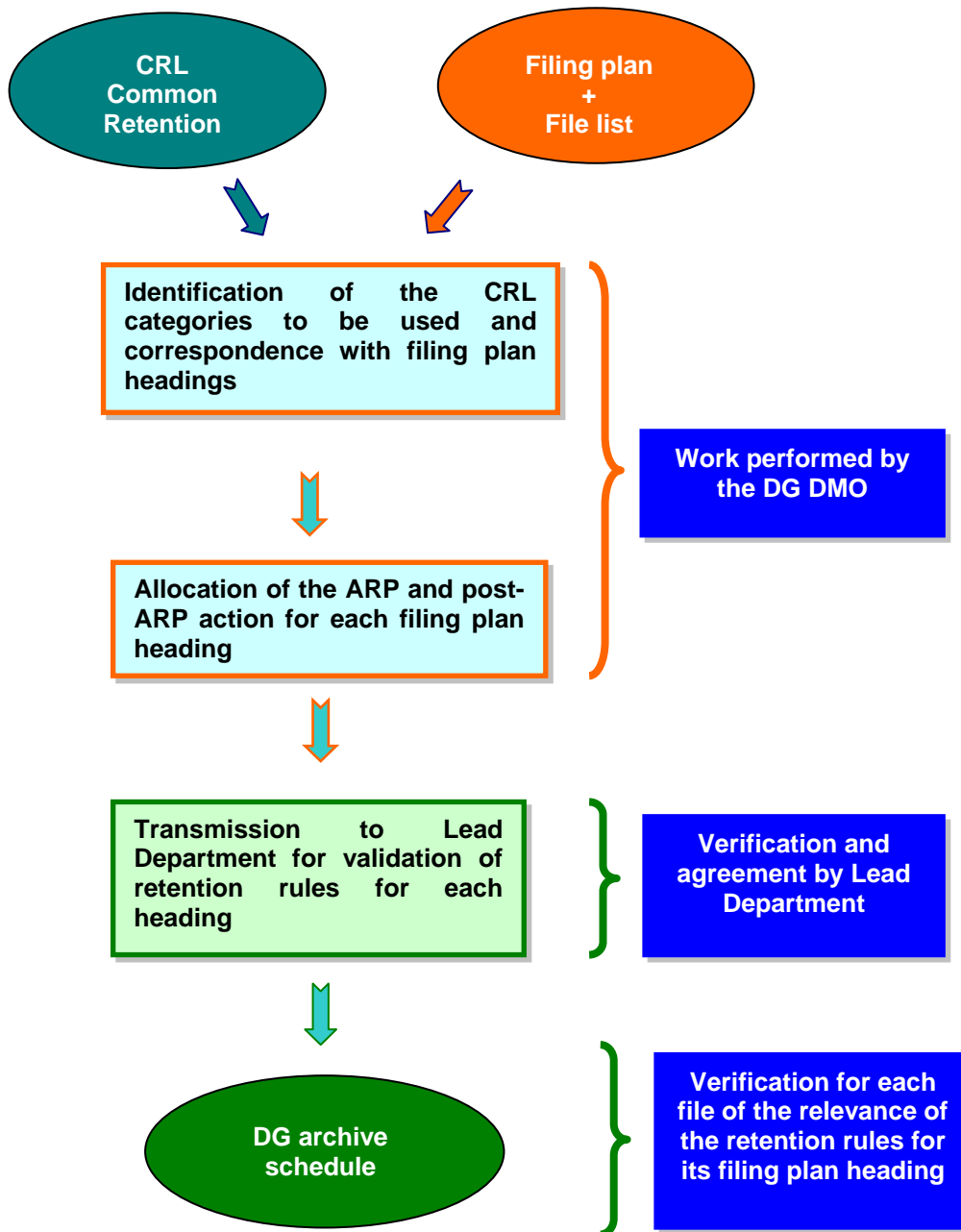
The archive schedule is an administrative document that governs the practical implementation of file retention in the DGs.

The schedule is drawn up by the DG DMO in collaboration with the Lead Departments, and sets out actions to be taken and responsibilities for the retention and elimination of official files in accordance with the Common Retention List.

The archive schedule must therefore give indications regarding:

- The location of files throughout their life cycle;
- The correspondence between the filing plan headings to which the files are attached and the CRL categories. The aim is that when a new file is created, its long-term retention attributes should be automatically assigned in accordance with the attachment heading in the filing plan.
- The retention medium and format (electronic and/or paper)
- The Lead Department (with information on any transfers of responsibility);
- The minimal file content
- Any rules for the elimination of documents;
- Factors that may give rise to the reopening of a closed file (OLAF investigation, case brought before the Court of Justice, complaints to the Ombudsman, etc.).

Drawing up an archive schedule



3. Retention implementing rules

3.1. RETENTION METADATA

File identification and filing metadata must be supplemented by retention metadata in accordance with the CRL:

- CRL category
- Administrative retention period (ARP)
- Post-ARP action: transfer to the Historical Archives (THA) or sampling/selection or elimination.
- Post-THA action: permanent conservation or 2nd review.
- Lead Department for retention
- Retention medium: paper/electronic/hybrid
- Location: storage area for paper files and IT application for electronic files
- Declassification where necessary
- List of documents in the file.
- Description of file content.

These metadata are mandatory and associated with the file. Some are indicated by the Lead Department when the file is created and others are implemented throughout the life of the file.

3.2. CALCULATING THE ARP

➤ 3.2.1. Closure of the file

The ARP runs from the date of closure of the file, i.e. from the date of the most recent document in the file (most recent registration or save date).

☞ If the file has not been properly closed, a forced closure will be carried out using as the date of closure the date of the most recent document in the file.

Special cases:

- **Investigation:** in the event of irregularity being suspected in a file with financial implications, closure cannot take place until it has been established that there was no irregularity or that any irregularities have been corrected.
- **Legal proceedings:** in the event of legal proceedings, a file cannot be closed until every avenue of recourse has been exhausted or sentence has been carried out.

➤ 3.2.2. Calculation of the ARP for specific types of file

- **Cabinet files:** the ARP corresponds to the term of office of the College and, irrespective of their date of closure, all files handled by the Cabinets are transferred to the Historical Archives at the end of a Commission's term of office.
- **Personnel files:** these are retained for eight years following the extinction of all rights vested in the interested party and any heirs or assigns, and for at least 120 years from the date of birth of the individual concerned.
- **Medical files:** these are retained for 30 years after the individual has ceased to be employed (or 40 years following exposure to carcinogenic or mutagenic agents) and at least until the individual concerned reaches the age of 75.

➤ 3.2.3. Suspension of the post-ARP action

If the use of a closed file is required in support of protection of the Commission's interests in the course of an investigation, legal proceeding or complaint to the Ombudsman, execution of the post-ARP action is suspended (put on legal hold) until the matter is settled.

At the end of the legal hold period, the suspended post-ARP action must be carried out.

3.3. ADMINISTRATIVE PRACTICES FOR THE ELIMINATION OF DOCUMENTS

The elimination of documents registered in an official file is authorised only if explicitly provided for in the Common Retention List or, where applicable, in the Specific Retention List.

The CRL explicitly states the obligation to eliminate certain documents contained in files before the ARP has expired. These practices are applicable to certain clearly defined types of file and serve to eliminate documents not subject to the same retention period as the file to which they belong.

This is the case with:

- **Grant procedures:** rejected proposals are eliminated after three years (the ARP of the file is 10 years).
- **Public procurement procedures:** all rejected bids are eliminated after five years (the ARP of the file is 10 years).
- **Intern ("Stagiaires") files:** elimination after five years of all documents except the application form, the internship offer, the letter of acceptance and the internship certificate (the ARP of the file is 50 years).

⇒ These retention periods are calculated from the date of closure of the file and the eliminations must be carried out before the ARP expires.

⇒ Only the documents themselves are eliminated: their metadata are retained.

3.4. RESPONSIBILITIES

➤ 3.4.1. Secretariat-General of the European Commission

The Secretariat-General is responsible for the coordination of records management and for monitoring implementation of the common retention standards.

As such, it produces:

- the Common Retention List of the Commission (and its updates);
- the methodology by which DG/Departments draw up any Specific Retention Lists;
- the procedures to be followed for the review and elimination of current and intermediate records.

➤ 3.4.2. DG/Departments

Each DG/Department of the Commission, the Executive Agencies or the European External Action Service is responsible for the physical protection of records under its responsibility and must guarantee their accessibility until such time as they are transferred to the Historical Archives Service.

◆ DG DMO

The DMO is responsible for:

- organising the retention of files within the DG. The DMO is thus responsible for drawing up the **archive schedule**.
- managing and monitoring implementation of the archive schedule.
- informing and training those responsible for retention in the different departments of the DG.

◆ Lead Department

The Lead Department is responsible for a file without being its “owner”. It may also be responsible for its retention, depending on whether the organisation of the DG is centralised, decentralised or hybrid:

- it must guarantee the integrity of the open files for which it is responsible (current records).
- it must guarantee the integrity and retention of closed files during their ARP if these paper files are physically retained on its premises.

◆ DG Archives Department

The DG Archives Department is responsible for implementing retention.

The department must therefore ensure that:

- current records are available to the persons competent to deal with the case;
- the department responsible for retention of the file is clearly identified and is aware of its responsibilities;
- the conditions of storage of current and intermediate records are such as to guarantee their physical protection (compliance with implementing rules on retention);
- it is aware of the nature and the location of intermediate records and definitive archives.

In order to ensure retention, the DG Archives Department must decide on the creation, modification, adaptation or migration of systems, resources and archive storage locations.

Recommendation:

- To guarantee secure conditions for retention of closed official paper files, these should be kept centrally at DG level.
- If closed files are not located in a central archive attached to the DG Archives Department, the Lead Department remains responsible for their retention during their ARP.

➤ **3.4.3. Transfers of responsibility**

Transfers of responsibility must be organised if:

- An activity is transferred to a new Lead Department while the corresponding files are still open (current records)
 - ⇒ Transmission of responsibility for the files to the new Lead Department (see above).
- The Commission is no longer responsible for an activity
 - ⇒ Closure of files by the Lead Department, which remains responsible for the files until their transfer to the Historical Archives or elimination
- The Lead Department ceases to exist (temporary organisation, abolition of a DG or a department) with no transfer of responsibility for continuation of the activity
 - ⇒ Closure of files and transfer to the Historical Archives Service of the Commission, which assumes responsibility for their retention.

VII. REVIEW AND TRANSFER OF FILES TO THE HISTORICAL ARCHIVES

The rules for the review and transfer of files to the Historical Archives are intended to:

- guarantee the long-term retention of the European Commission's archives;
- facilitate access to the Historical Archives;
- enable the Historical Archives of the European Commission to be opened to the public after 30 years.

1. Post-ARP actions: first review

DGs are under obligation, at least once a year, to identify those files whose ARP (Administrative Retention Period) has expired and to implement the post-ARP action laid down in the DG's archive schedule:

- Transfer to the Historical Archives Service of the Commission,
- Sampling/Selection
- Elimination

1.1. REVIEW OPERATIONS

At the end of their ARP (Administrative Retention Period), intermediate records must be reviewed (execution of post-ARP action). This operation, known as the **first review**, must be carried out by the originating Directorates-General/Departments in order to identify, under the rules of the CRL, those files to be transferred to the Historical Archives and those to be destroyed, possibly after sampling or selection.

The operation of first review and transfer to the Historical Archives is carried out under the responsibility of the DG/Department DMO.

For files transferred to the Historical Archives, the CRL may stipulate a **second review** to identify, no later than 25 years after their closure, files that will be retained definitively (Historical Archives) or eliminated, possibly after sampling or selection.

This second review, based on the historical value of the files, is carried out by the Historical Archives Service in cooperation with the originating department or its successor.

1.2. SAMPLING/SELECTION

These operations ensure that only a predetermined percentage of files will be retained and the rest eliminated:

- **Sampling:** Selection for retention of a sample of files representative of the whole, on the basis of objective criteria. The sampling may be systematic (based on chronological, alphabetic, numerical or other criteria) or random.
 - ⇒ this procedure is suitable for serial files or files which are very similar in content.
 - ⇒ the sample size must be of an order of magnitude adequate to guarantee its representative nature. Sampling should therefore be applied only to bodies of over 200 files.

- **Selection:** Selection for retention of a certain number of files forming part of a larger body, on the basis of the selector's appraisal criteria. In this instance, the files retained will not necessarily be representative of the larger body to which they belonged.
- ⇒ The selection criteria may be based on the importance of the unit generating the file, for example, the importance of the case being handled, its research interest, media impact, etc.

Selection and sampling may be combined for a single body of files.

The procedure followed for these operations must be documented by the department carrying out the review, in the form of minutes recording:

- The justification for and purpose of the procedure adopted
- The list of files subject to sampling or selection: reference to the CRL category, identification of files retained and files eliminated
- The criteria applied and the grounds for their choice.

1.3. RULES OF TRANSFER TO THE HISTORICAL ARCHIVES

A transfer of files to the Historical Archives must follow three principles:

- Physical transfer of the records
- Preservation of the metadata associated with the records
- Following of correct procedures for the transfer

N.B.: Procedures for transfer to the Historical Archives currently concern only paper files.

- Electronic and digitised files: a procedure for the transfer of files and their metadata to the electronic repository of the Historical Archives is under development. For the time being, files closed at the end of their ARP must remain in the IT system responsible for their management.
- Hybrid files: it is recommended that no transfer be made (of either the electronic or the paper component) until the electronic repository of the Historical Archives is in place. A DG wishing to transfer the paper component of the files, however, may do so as long as the accompanying documents mention that this is part of a hybrid file and guarantee that the future reconstitution of the complete file will be possible at the time of transfer of the electronic component (same file title and code)

⇒ **The Historical Archives Service, in collaboration with the Secretariat-General, has produced a "Guide to transfers to the Historical Archives".**

➤ 1.3.1. Stages in the transfer procedure

The following stages must be respected:

- 1) Appraise the files to be transferred to the Historical Archives on the basis of the DG's archive schedule.
- 2) Prepare the transmission form and the list of files to be transferred from the main file list: the transmission form must be signed by the DMO (transmission by the DMO via ARES is equivalent to a signature) acting under the authority of the Director-General.
- 3) Send the list and the form to the Historical Archives for agreement: the transmission form must be countersigned by the Historical Archives Service (the return via ARES of the form containing the transfer identification number is also equivalent to countersignature by the Historical Archives Service).
- 4) Once the agreement is received, prepare the files for shipment (packing, labels, boxes, pallets).
- 5) Send the files with a copy of the transmission form and the list of files transferred to the Historical Archives.
- 6) Keep permanently (i.e. indefinitely) a copy of the transmission form and list of files transferred.

➤ 1.3.2. Traceability

The metadata accompanying the phases of file creation, registration, filing and retention must be completed by transfer metadata:

- Date of transfer.
- Identification of the department making the transfer.
- Identification of any documents and files containing classified or sensitive information: motive, level and duration of classification or exception to the opening of the archives to the public.

➤ 1.3.3. Consultation of the Historical Archives

Archives that have been transferred can continue to be consulted by the DG/Departments. In certain instances, however, consultation by another DG can only be authorised by the Lead Department for the files (examples: personnel files, merger files, government grant files).

Procedure for the consultation of archives by the DG/Departments:

- Check the transfer form number
- Identify the number of the file to be consulted
- Send the request to the Historical Archives
- After consultation, return the file in good order

Before the 30-year period expires, the files are examined by the Historical Archives Service: those that are of sufficient historical interest and may be opened to consultation are sent to the European University Institute in Florence.

1.4. RULES OF ELIMINATION

Elimination is the regulated procedure leading to the physical destruction of files: destruction of the storage medium for paper records and complete erasure for electronic records.

Elimination is carried out:

- in accordance with Common Retention List instructions;
- after confirmation from the Lead Department and, if necessary, from the Historical Archives and/or the Legal Service.

➤ 1.4.1. Stages in the elimination procedure

The following stages must be respected:

- 1) Draw up the list of all the files to be eliminated in accordance with the Common Retention List (see below)
- 2) Check the content of the files
- 3) Fill in the elimination forms, including the relevant authorisations, in particular that of the DMO when the elimination is being carried out by the DG/Department
- 4) Destroy the files once all the authorisations are granted

For records on paper or any other physical medium, elimination involves the physical destruction of the storage medium in accordance with current destruction/recycling standards:

- Paper records may be destroyed only by incineration or shredding, but never by simply discarding them (yellow waste bin).
- Specific procedures will be defined for the elimination of electronic records.

➤ 1.4.2. Traceability

The procedure followed for elimination must be documented, indicating:

- 1) The grounds for elimination
- 2) The list of files eliminated, with their metadata from the phases of file creation, registration, filing and retention:
 - File code(s) and title
 - Lead Department(s)
 - Creation date and closure date
 - CRL type of file
 - Description of the file, indicating in particular whether paper/electronic/hybrid
- 3) Date of elimination
- 4) The department and individuals responsible for the decision to eliminate the file
- 5) The conditions of physical destruction of the storage medium: department and individual responsible for the physical destruction of the files, date and method of destruction.

The lists of files eliminated and the destruction reports must be retained permanently:

- if the elimination is carried out after the first review, the department responsible must produce and transmit a copy of this documentation to the Historical Archives Service for permanent retention.
- if the elimination is carried out after the second review by the Historical Archives Service, the department produces and retains the documentation and sends a copy to the DG/ Department concerned.

1.5. PROCEDURES APPLICABLE TO FILES CREATED PRIOR TO E-DOMECC

All the above procedures are applicable to files created and managed according to e-Domecc rules. In the case of files created prior to the implementation of e-Domecc requirements and not covered by the CRL, these rules may still serve as a model.

These records must be subject to review for elimination or transfer to the Historical Archives. The transfer must be made no later than five years after closure of the files.

To transfer these records to the Historical Archives:

- 1) Draw up the list of files to be transferred (basic list or "liste de base"), indicating for each file:
 - elements of identification: title, code, etc.
 - year opened (year of the oldest document)
 - year closed (year of the most recent document)
 - any documents that are classified or contain sensitive information
- 2) Prepare the transmission form, stating:
 - the department making the transfer
 - the general theme of the files
 - opening and closure dates of all the files
 - the type of physical unit
 - the individuals responsible
- 3) Have the transmission form signed by the DMO (via ARES).
- 4) Send the signed transmission form to the Historical Archives for countersignature (via ARES).
- 5) Once the agreement is received, prepare the files for shipment, (packing, labels, boxes, pallets).
- 6) Send the files with a copy of the transmission form and the basic list to the Historical Archives.
- 7) Keep permanently a copy of the transmission form and the basic list.

2. Responsibilities for review and transfer operations

2.1. THE SECRETARIAT-GENERAL OF THE EUROPEAN COMMISSION

The Secretariat-General ensures coordination of records management and monitoring the implementation of common standards of review and transfer of files to the Historical Archives. To that end, it defines:

- the general criteria applicable to the first review of files (in cooperation with the Interdepartmental Group of Document Management Officers and the Historical Archives Service).
- the general criteria applicable to the second review of files (in cooperation with Historical Archives Service of the Commission and after consulting the Interdepartmental Group of DMOs).

2.2. DG/DEPARTMENTS

The Document Management Officer (DMO) is responsible, under the authority of the Director-General or head of department, for the first review of files and for transfer to the Historical Archives.

Each DG/Department retains responsibilities for files transferred to the Historical Archives and must:

- cooperate with the Historical Archives Service:
 - in the event of a second review
 - on declassification operations
- continue to process requests for access to the documents and files until the archives are opened to the public.

2.3. THE HISTORICAL ARCHIVES SERVICE

The Historical Archives Service is responsible for:

- the physical protection of transferred files and their descriptive metadata;
- making files available to DG/Departments on request (in certain instances, the prior agreement of the originating DG/Department may be required);
- transmission to the originating DG/Department of requests for access to the documents and files;
- processing requests for access to the documents and files when the originating DG/Department no longer exists;
- second review operations in cooperation with the originating DG/Department;
- examining, in collaboration with the DG/Department responsible, files containing sensitive or classified information, with a view to their declassification: this examination must be carried out no later than 25 years following closure of the files and subsequently once every five years, if necessary;
- opening of the Historical Archives of the Commission to the public after 30 years.




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