



EUROPEAN COMMISSION  
JOINT RESEARCH CENTRE

Strategy, Work Programme and Resources  
Director

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**Interservice Consultation launched by:** DG SG

**Reference:** ISC/2020/00857

**Title:** Commission Decision on records management and archives

**Contact person(s):** [REDACTED] (JRC.R)

☐ Accord

☒ **Avis favorable sous réserve de la prise en compte des commentaires**

☐ Avis négatif

**Comments:**

Thank you for consulting DG JRC on the Commission Decision on records management and archives. From our review, we have the following comments, given in track-changes in the attached documents, which we request are taken on-board.

Section	Comment
Commission Decision – general comment	There is no mention of the business owner, who is it and what are its responsibilities with regards to activities conducted by DGs and producing records. For several horizontal activities, the business owner is outside of a DG (e.g. financial, ITs, communication activities,...). For example, it would be advisable to include the role of the business owner in Article 7 of the Decision.
Commission Decision – general comment	In analogy with the updated terminology of the new Decision, i.e. replacement of the word “Document” with the word “Record”, the name of the function DMO, should be also updated to Records Management Officer.  As the word “Records” seems to be the one internationally recognised in the professional milieu (ISO 15486), the change would be in line with the actual commitment of professionalising the function of DMO by giving it a professionally acknowledged title. Moreover, in line with efforts to modernise the function and bring it to the electronic era.

	this occasion should be used to detach the title from documents seen as paper of the past.
Commission Decision, Article 1	On point 1, there is no mention nor reference that a record could be eliminated. Therefore, it would be worth to consider including the notion of “disposal” of records. Because as it reads, it implies that we preserve everything forever.
Commission Decision, Article 3	On point 3, given that a video and/or an audio cannot be “transformed” into an image, it is proposed to replace the word “image” with the word “object” which is also in line to the wording used into the Annex paragraph 2.1.
Commission Decision, Article 5	On Point 2, it is suggested to add the word “created” and to replace a sentence by using the same wording as of Article 6, point 5 “replace the correspondent original analogue record from that moment onward”. Alternatively, the entire sentence can be deleted to avoid repeating.
Commission Decision, Article 14	It is proposed to add the word “analogue”, to be coherent with Article 16, point 1 where the deposit to the EUI of analogue media only is mentioned. Otherwise it is not clear whether the electronic born records go to EUI or stay with HAS.
Commission Decision, Article 17	On Point 1, we list that each DG is responsible to provide organisational, administrative and physical structure. In coherence with Article 4, shouldn't we also indicate who is responsible to provide the computerised structure?
Annex to Commission Decision -Paragraph 3.1	It is requested to better clarify what is the list of documents that is put in this Article. Are those documents that “do not require the signed original of the record”
Annex to Commission Decision -Paragraph 6.4	Added the role of the “record originator” when requesting the changes to Records to be in line with Security Notice C(2019)1903.
Annex to Commission Decision -Paragraph 12.6	Notification of a small typo.
Annex to Commission Decision -Paragraph 12.8	There are files that due to their nature and length, they cannot be sent to the HAS after than 15 years (e.g. building contracts).
Annex to Commission Decision -Paragraph 16.2	Several comments aimed to clarify the role of the DMO and <del>proposal of improvements in track changes.</del>

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