



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR EDUCATION, YOUTH, SPORT AND CULTURE

Performance Management, Supervision and Resources
The Director

Brussels,
EAC.R [REDACTED]

SUBJECT: **REPLY FROM DG EDUCATION AND CULTURE
TO THE INTER SERVICE CONSULTATION LAUNCHED BY SG**

Reference: **ISC n° ISC/2020/00857 de la DG SG**

TITLE: **RECORDS MANAGEMENT AND ARCHIVES**

- ☐ Agreement
- ☒ Favourable opinion subject to comments being taken into account
- ☐ Negative opinion

Contact: [REDACTED]

Thanks for consulting DG EAC on this important file.

EAC welcomes the simplification proposed in form and content as regards the former official texts.

Draft Decision

- **Art. 3. Definitions.**
 - The term “Document” is missing in the list of definitions while it is mentioned through the Draft decision and in particular in the Annex.
 - The relation between “document” and “record” is not then clear (ie, pag.4, 5, 6, 7 ...)
 - To avoid misunderstandings, it would be useful to clearly define both terms or ensure consistency in its use in both texts by removing one of them.
 - We would be inclined for a more practical approach:
 - Document: any kind of support, paper, electronic or other, containing information.
 - Record: a group of metadata in an IT system describing a document.

It should be considered possible impact on electronic signature: would be useful to align our internal terminology with that of the new EU context of electronic signature, eIDAS, where to our understanding they talk of “documents” instead of “Records”.

Annex

- **Object of an electronic signature.**

The object to be signed sometimes seems to be a “record” and others a “document”. We should pay attention to this to avoid confusion among users. We do not really see the difference.

In p. 5, ch.1.1.a, it is mentioned “...they sign the record by means of their electronic signature”. While in p.9, ch.3, it mentions: “only digital documents can be signed by means of an electronic signature”.

If there is no a significant difference, both paragraphs should be coherent because terms are different and seems to be used in an equivalent way.

Arturo CABALLERO BASSEDAS