**Guidelines on document management and access to documents**

1) Document registration

In accordance with the Commission Decision on document management[1], a document drawn up or received by the Commission must be registered if it contains important information which is not short-lived and/or may involve action or follow-up by the Commission or one of its departments.

Not registering such a document could prevent the institution from retrieving it at a later date. Keeping documents in a working space such as shared drives or electronic mailbox folders does not ensure their integrity, preservation and retrieval. It is therefore **essential that all documents that meet the registration criteria defined in the eDomec rules[2] are actually registered**.

It should be noted that registering a document does not mean that it will automatically be released in case of a request for access as an exception[3] may well apply.

> ➤ **Practical registration criteria are provided in annex**.

2) Filing and retrieval

Registering a document ensures its integrity and preservation. Filing it will facilitate its retrieval, both by enabling a thematic search and by making it accessible to a larger number of colleagues.

**An unfiled document is only accessible to a few colleagues** (the sender, the recipient(s), and the colleagues who received an attribution task). Filing it makes it accessible to the members of the group which has been granted access to the file. This is usually a unit or a DG, but it is possible to give Commission-wide access to files which are both of general interest and not sensitive.

While the new release of Ares features improvements to the full-text search functionality, retrieval of registered documents will still depend critically on their proper filing.

> ➤ **All registered documents should be filed.**

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[1] Decision 2002/47, art 4

[2] Annex IV.3 of SEC (2009) 1643. See also the practical registration criteria in annex

[3] In the sense of Regulation 1049/2001 (OJ  L 145/2001), art 4

3) <u>E-mails</u>

**The abovementioned registration criteria defined in the eDomec rules apply to E-mails**[4]. An e-mail that contains important information, involves action or follow-up, or may later be needed as proof, should therefore be registered in Ares[5]. Storing an important and not short-lived e-mail in an electronic mailbox or on a shared drive is not sufficient because this does not ensure its integrity and preservation.

In case of a request for access, important e-mails should be retrievable in Ares, just as other types of documents.

The most practical way to register e-mails is to use "Areslook".

> ➤ **Areslook**, **which thus far has been installed only on request, should be installed on a systematic basis on all staff personal computers**[6]**, at the latest on 1 March 2015**. Document Management Officers (DMOs) should inform and provide training to staff at all levels on the use of Areslook.

Conversely, e-mails which do not qualify for registration in Ares should not be permanently stored. These e-mails should be deleted by the sender and the recipient(s) when they become obsolete and/or are superseded by events.

Technical tools allowing an **automatic deletion** or any other form of instant mass-deletion of the e-mails still present in Inbox and Sent Items segments of the electronic mailbox after a period of 6 months following their reception or creation date will be put in place by DIGIT on 1 July 2015. Staff will be able to transfer e-mails to personal folders for purely personal use outside service activity, with the consequence that the Commission considers such transferred items to be strictly personal items, not Commission documents, so such transfer must not be practiced as an alternative to proper registration in Ares. A similar system is already applied by the European Parliament and the Ombudsman (after 3 months), and is envisaged by the European Central Bank.

> ➤ **E-mails which do not qualify for registration in Ares should be deleted in due time**.

> ➤ **Unregistered e-mails will be automatically deleted after 6 months from the electronic mailbox (Inbox and Sent Items segments).**

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[4] The same also holds true for other media such as SMS, although in practice the criteria are less frequently met than for e-mails. However, should it be the case, the content of such other media should be transferred or copied to an e-mail account and then registered as an e-mail or, if this is technically not possible, scanned and then registered by some other means, such as a note to the file.

[5] See the practical registration criteria in annex. On aspects specific to e-mails, see also SEC (2006) 353.

[6] This should be done by the Information Resource Managers (IRMs) in close coordination with the DMOs

4) <u>Importance of correct registration and filing for access to documents</u>

Regulation 1049/2001 on public access to documents applies to documents drawn up or received by the institution and in its possession, in all areas of activity of the European Union, concerning a matter relating to the policies, activities and decisions falling within the institution's sphere of responsibility[7].

Documents which fall under this definition should be registered according to the registration criteria mentioned above.

> **When processing a request for access, documents should therefore be only searched for in Ares or in another Commission document management system[8]**.

5) <u>Need for a change in administrative practices</u>

As noted by the "peer review", the proper and full implementation of document management rules still constitutes a challenge, in particular at the level of middle managers and desk officers.

> **Document management should be included in job descriptions and objectives and discussed during appraisals**, so as to make staff at all levels aware of its responsibilities in this field.

> **Participation in "e-Domec" courses should be encouraged**. These courses are regularly organised for staff at all levels (managers and desk officers / secretaries / DMOs and DMO correspondents)[9].

> **Implementation of Internal Control Standard n°11**[10], which relates to Document Management, **should be regularly monitored by internal auditors and taken into account in Annual Management Plans and Annual Activity Reports.**

Annex: practical registration criteria

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[7] Regulation 1049/2001, art 2.3 and 3a)

[8] Such as Decide, ABAC, etc. These systems will be integrated with Hermes/Ares/Nomcom ("IT Rationalisation" project)

[9] There are also trainings on the use of ARES and NOMCOM, organised by DIGIT, and comprehensive guidance on the intranet, both on the policy side (on the eDomec website) and on the IT side (on ARES website).

[10] <u>Standard:</u> Appropriate processes and procedures are in place to ensure that the DG's document management is secure, efficient (in particular as regards retrieving appropriate information) and complies with applicable legislation. <u>Requirements:</u> Document management procedures and related systems comply with compulsory security measures, provisions on document management and rules on protection of personal data. Every document that fulfils the conditions laid down in the implementing rules needs to be registered, filed in at least one official file and preserved during the period established by document management rules. To do so, the DG uses systems which respect the above rules, mainly HERMES-ARES-NOMCOM.