EUROPEAN COMMISSION
DIRECTORATE GENERAL
JOINT RESEARCH CENTRE

How to define the Content Of Files (COF)

Type of document	Document owner	Document ID		Version No	Page
JRC-IMS Work Instruction	Unit Head JRC.B.1	JRC-IMS-M4.1-WI003		1.0	1 / 11
Related main IMS process:	M4.1. Internal and External control				
Related other processes:					

Key words: Internal Control, Content of Files

Function	Name	Signature	Date
Author(s)		This document is signed electronically by the lead author, reviewers and approver using e-Signatory in ARES (Saved: jrc.b.1(2014)3885750)	
Reviewer (content)			
Reviewer (form)			
Approved by			

Previous versions of this document		
Version No	**Date of approval**	**Changes from previous version**

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IMS	Template version: 1.4	Template created: 06/08/2014	Template approved by:

1   INTRODUCTION

1.1   Purpose and scope

The purpose of this document is to provide the rules for the definition of the content of files.

1.2   Definitions

Relevant extracts from Glossary of Document and Records Management Acronyms and Terms (JRC-DRMP-ACTE document)

Document	Any content drawn up or received by the Commission concerning a matter relating to the policies, activities and decisions falling within the institution's competence 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).
Documents Life cycle	Process of creating, filing, approving, registering, circulating/distributing, storing, preserving and eliminating documents.
File	The core around which the documents are organised in line with the institution's activities, for reasons of proof, justification or information and to guarantee efficiency of the work.
Lead department	Organisational entity responsible for the file opening, closure and preservation, as well as for the definition of the content of the file and the filing of documents accordingly.
Process owner	Person responsible for describing and ensuring the implementation, maintenance and improvement of his/her process and its interactions.
Record	Document providing evidence of activities performed and/or stating the results achieved, formally registered and filed in an official file of the Commission.

1.3   Acronyms

DMO	Document Management Officer
COF	Content of File
ICS	Internal Control Standard
CRL	Common Retention List (of the European Commission)
JRC	Joint Research Centre
ARES	Advanced REcords System
WP	Work Programme
JPB	JRC Project Browser
PUBSY	JRC PUBlications repoSitorY
TED	Tenders Electronic Daily
TAS2	Time Accounting System version 2
ISO	International Organization for Standardization
IMS	Integrated Management System
CD	Compact Disc

DVD   Digital Video Disc

e-Domec   electronic Document management at the European Commission

DRMP   Documents and Records Management Policy (of JRC)

DRMP-ACTE   JRC Documents and Records Management Policy ACronyms and TErms

DG   Directorate-General (of the European Commission)

2 EXECUTION

2.1 The 4 principles for the definition of the content of files (COF)

2.1.1 Why to define the content of files: ICS COMPLIANCE

COF definitions contribute to the compliance with the following Internal Control Standards:

ICS		Contribution to compliance
6	Risk management	COF definitions reduce the risk of loss of information and documents while including their protection.
8	Processes and procedures	COF definitions efficiently complete documented processes and procedures.
9	Management supervision	COF definitions improve traceability of information and documents
10	Business continuity	COF definitions guarantee a common understanding of documents filing, facilitate handover of files and efficiently contribute to business continuity.
11	Document management	COF definitions comply with the obligation to register, file and preserve documents related to official duties.
13	Accounting and financial reporting	COF definitions efficiently contribute to keeping up to date accounting and financial documentation and to making it accessible.

COF definitions contribute to the compliance with ISO 9001:2008.

2.1.2 How to define the content of files: ACTIVITY BASED

COF should be defined in accordance with the activity to which it refers.

One activity may imply the definition of one or several files and their related or respective contents.

2.1.3 When to define the content of files: DRIVEN BY PROCESS

COF should be defined any time a new process, procedure or work instruction is put in place for the implementation of the related process description.

The review or improvement of processes, procedures or work instructions may imply the review of the corresponding COF.

2.1.4 Who is to define the content of files: PROCESS OWNER or LEAD DEPARTMENT

The process owner is responsible for the definition of the corresponding COF.

The process owner shall ensure appropriate awareness of COFs on a need-to-know basis to any stakeholders in charge of the implementation of the related processes, procedures or work instructions.

In the exceptional instance of a process owner not being identified, the Lead Department shall be responsible for the definition of COF and appropriate awareness.

The DMO provides all necessary support to process owners and/or lead departments in defining their COF.

2.2   Defining the content of File

2.2.1   COF definition structure

COF definition shall identify **files** and **records or documents** (within a file).

COF definition shall unambiguously describe what to file and, where the case arises, register, where and how.

COF definition should be designed with the aim of ensuring completeness and accuracy of files.

A COF definition template and applicable usage guidance are provided in Annex A.

COF definitions examples are provided in Annex B.

2.2.2   Files

COF definition shall identify the specific files to be organised for the management of documents and records generated through the implementation of the related processes, procedures or work instructions.

Each identified file shall address the following information:

Scope	Concept	Description
WHAT	Standard file type	Identification of the activity to which the file is related (e.g. Scientific project).
WHAT	File title	Identification of file during its whole life cycle, including Historical Archives. It should describe the action and subject of the related case or project.
WHAT	File identifier	Unique identifier of the file.
WHAT	Common Nomenclature	Identification of the entry in the Common Nomenclature of the European Commission where the file is organised (decimalisation heading).
WHEN	CRL Category	Reference of the category in the Common Retention List of the European Commission, this category prescribing the applicable Administrative Retention Period (ARP) as well as the post-ARP treatment (elimination, sampling/selection, transfer to historical archives).
WHO	Lead Department	Organisational entity responsible for the file opening, closure and preservation, as well as for the definition of the content of the file and the filing of documents and records accordingly.
WHO	Access	Accesses granted to the file (filing access, read access)
WHERE	Repositories	List of the repositories used for the filing of related documents and records.
n/a	Other	Any relevant information concerning the document or record.

The DMO provides all necessary support to process owners and/or lead departments in defining their files.

2.2.3   Documents and Records

The list of documents and records shall identify, as exhaustively as possible, all documents that are created or received, and, where the case arises, registered, in the context of the related processes, procedures or work instructions.

The COF shall address the following information for each document or record.

Scope	Concept	Description
WHAT	Name	Descriptive name of the document or record.
WHAT	Mandatory/Optional	Indication whether this document or record is mandatory or not with regard to applicable legal constraint or internal requirements applicable to the related process, procedure or work instruction.
WHERE	Repository	Name of the repository where the document or record is filed.
HOW	Identifier	Identifier of the document or record in the related repository.
HOW	Approval method	When the document or record is subject to approval, method used to undertake such approval. It may be either by means of electronic workflow or paper/handwritten workflow.
HOW	Preservation medium	Medium used for the storage and preservation of the official version of the record. It may be stored in Electronic/Digitised format and/or on physical support such as paper or any other format (CD, DVD,).
n/a	Other	Any relevant information concerning the document or record

The DMO provides all necessary support to process owners and/or lead departments in defining their COF.

3 LINKS TO OTHER DOCUMENTS

3.1 Legal Background

3.1.1 Grounds of document management

Document management in the European Commission is ruled by a set of decisions referred to as e-Domec, and in particular Provisions on document management of the Commission Decision 2002/47/EC, ESC, Euratom, amending its Rules of Procedure (OJ L 21 of 24.1.2002, p. 23).

e-Domec addresses both paper document management and electronic document management.

e-Domec is further translated in Internal Control Standard 11 requiring notably that "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 the document management rules. To do so, the DG uses repositories which respect the above rules, mainly HERMES-ARES-NOMCOM".

In addition, the JRC implements quality management systems established in accordance with ISO 9001:2008.

3.1.2 E-Domec requirements

As to the content of files, i.e. what documents need to be registered and filed, the implementing rules (SEC(2009)1643) state as follows:

Documents to be registered are all documents, regardless of the medium, that:

(a) are received or formally drawn up by a Commission department in the course of its activities;

   and

(b) (i) are likely to require action, follow-up or a reply from the Commission or one or more of its departments;

   or

   (ii) involve the responsibility of the Commission or one or more of its departments;

   and

(c) contain important information which is not short-lived.

Documents that are drawn up as effective administrative or legal evidence of decisions, situations, intentions or events linked to the activities of the Commission or its departments must also be registered.

Documents which fulfil either the condition set out in the preceding paragraph or all the conditions set out in points a) to c) above must be registered in the general register or in a specific register unless they are governed by rules or procedures with equivalent effect.

It is not necessary to register a document in the general register if it is already registered in a specific register and vice versa.

A specific register must fulfil the same criteria as the general register, and the procedure involved must afford equivalent guarantees.

These provisions leave some room of interpretation as to what documents must be registered and where they must be filed, which must be compensated by additional definition of the content of files to clearly identify what records must and may be included in the file.

3.1.3 ISO 9001:2008 requirements

Quality management systems established in accordance with ISO 9001:2008 shall include, notably, "*documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of its processes*".

Documents required by the quality management system shall be controlled notably to "*ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the quality management system are identified and their distribution controlled*" and to "*apply suitable identification to them if they are retained for any purpose*".

Furthermore, in accordance with ISO 9001:2008 requirements, "*the organization shall establish a documented procedure to define the controls needed for the identification, storage, protection, retrieval, retention and disposition of records*".

As a result, the present rules further assist JRC Directorates and/or Units to develop their quality management systems in accordance with ISO 9001:2008 requirements.

3.2 **Reference documents**

JRC-DRMP-Policy   JRC Documents and Records Management Policy

JRC-DRMP-Strategy   JRC Documents and Records Management Strategy

JRC-DRMP-Governance JRC Documents and Records Management Governance

JRC-DRMP-ACTE   Glossary of Documents and Records Management Acronyms and Terms

3.3 **Annexes**

Annex A   COF definition template

Annex B   COF definition examples

4 DOCUMENT MANAGEMENT

4.1 Control of this document

This document is a controlled JRC Management System document, and the document owner identified on the cover page has the duty to maintain it. This includes keeping the document up-to-date, making the latest version available to the users, and informing the users on the updates as necessary.

Any user of this document who identifies an inaccuracy, error, ambiguity or potential improvement need is requested to contact the Document Owner.

4.2 Records management

The records created in application of the present Work Instruction shall be managed systematically in accordance with the following definition.

Standard file type:	IMS Records					
File title:	M4 - Control, Compliance and Improvement					
File identifier:	B01.2013/IMS.RECORDS.M4					
Common Nomenclature:	09.01.53.060.020 - IMS Records					
CRL category:	12.10.2					
Lead Department:	JRC.B.1					
Access – filing:	Quality Managers					
- read:	JRC					
Repositories	ARES					
Comment						
List of Documents and/or Records						
Name	Mandatory /Optional	Repository	Identifier	Approval Method	Preservation Medium	Other
COF Definition	Optional	ARES	Ares Reg. Nr	e-Signatory	Electronic	

The Lead Department shall be responsible for the opening, closure and preservation of the files in accordance with the rules and procedures made available by the JRC DMO.

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ANNEX A – COF DEFINITION TEMPLATE

Standard file type:	
File title:	
File identifier:	
Common Nomenclature:	
CRL category:	
Lead Department:	
Access - filing:	
- read:	
Repositories:	
Comment:	

List of Documents and/or Records						
Name	Mandatory /Optional	Repository	Identifier	Approval Method	Preservation Medium	Other

Explanatory notes

File description

Standard file type	Identification of the activity to which the file is related (e.g. scientific project file).
File title	Identification of file during its whole life cycle, including Historical Archives. It should describe the action and subject of the related case or project.
File identifier	Unique identifier of the file, if applicable (e.g. specific code in Ares/NomCom, JIPSY number, Procurement procedure reference …).
Common Nomenclature	Identification of the entry in the Common Nomenclature where the file is organised (decimalisation heading).
CRL Category	Reference of the category in the Common Retention List of the European Commission, this category prescribing the applicable Administrative Retention Period (ARP) as well as the post-ARP treatment (elimination, sampling/selection, transfer to historical archives).
Lead Department	Organisational entity responsible for the file opening, closure and preservation, as well as for the definition of the content of the file and the filing of documents and records accordingly (e.g. unit, director's office).
Access	Accesses granted on the file (filing access=who can add documents or records into the file / read access=who can read the content of the file)
Repositories	List of the repositories used for the filing of related documents and records (e.g. ARES, JIPSY, PUBSY, shared drive, SharePoint, cupboard …).
Comment	Any relevant comment.

Records description

Name	Descriptive name of the document or record.
Mandatory/Optional	Indication whether the document or record is mandatory or not with regard to applicable legal constraint or internal requirements applicable to the related process, procedure or work instruction.
Repository	Name of the repository where the document or record is filed.
Identifier	Identifier of the document or record in the related repository.
Approval method	When the document or record is subject to approval, method used to undertake such approval. It may be either by means of electronic workflow or paper/handwritten workflow. Otherwise, state "not applicable".
Preservation medium	Medium used for the storage and preservation of the official version of the record. It may be either stored in Electronic/Digitised format or on physical support such as paper or any other format (CD, DVD,).
Other	Any relevant information concerning the document or record.

ANNEX B – COF DEFINITION EXAMPLES

Warning!!! **The following COF definition is provided for the sake of example. It is not deemed complete nor applicable with regard to the activity it refers to.**

Example 1 – Procurement file for tender procedure above 60k€

Standard file type:	Procurement File (above 60k€)				
File title:	TENDER JRC/SSS/YYYY/D.U/NNNN/TT - description				
File identifier:	NomCom file specific code (see note Ares(2013)2928446) cdf.yyyy/SPEN.CFT.nnn.tt.duu				
Common Nomenclature:	10.02.03.53.030.010.xxx - Procurement – Directorate …				
CRL category:	12.6.1.B Procurement procedures				
Lead Department:	JRC.B.5 / 8 / 9 / 10 / 11, i.e. unit in charge of the procurement file as FIA				
Access – filing:	Unit in charge of the procurement file as FIA				
- read:	Unit(s) of customer OIA / AOS				
Registration Repositories:	ARES, TED, Cupboard				
Comment:	Documents uploaded through PPMT end up in ARES.				
List of Documents and/or Records					
Name	Mandatory /Optional	Repository	Identifier	Approval Method	Preservation Medium	Other
Procurement justifications	Mandatory	ARES	Ares reg. nr	e-Signatory	electronic	
OJ Publications	Mandatory	TED	OJ nr.	n/a	electronic	
Invitation letter	Mandatory	ARES	Ares reg. nr	e-Signatory	electronic	
Tender documentation Administrative Annex, Technical specifications, Draft contract / purchase order , LEF/BAF form	Mandatory	ARES	Ares reg. nr	n/a	electronic	
Selection documents	Mandatory	Cupboard	n/a	n/a	Paper	
Selection decision	Mandatory	ARES	Ares reg. nr	e-Signatory	electronic	
…						

Warning!!!   The following COF definition is provided for the sake of example. It is not deemed complete nor applicable with regard to the activity it refers to.

Example 2 – Scientific project file under JRC Work Programme 2014-2016

Standard file type:	**Scientific Project file under JRC WP 2014-2016**
File title:	Scientific project name
File identifier:	NomCom file specific code number based on JPB number and acronym (see note Ares(2014)1563426) JPB Project Nr and Acronym
Common Nomenclature:	03.08.01.515 - Implementation of JRC Work Programmes 2014-2020
CRL category:	2.1.4 CONTRIB - STRATEGY AND COORDINATION/Strategic programming and planning (SPP)/ Commission's Legislative and Work Programme (CLWP)
Lead Department:	Project unit as per JPB
Access - filing:	Project unit as per JPB
- read:	JRC
Repositories:	JPB, ARES, PUBSY, Project working file, TAS2
Comment:	

List of Documents and/or Records						
Name	Mandatory /Optional	Repository	Identifier	Approval Method	Preservation Medium	Other
Project proposal (PP1)	Mandatory	JPB	JPB nr	e-Signatory	electronic	
Release of output to customer/stakeholder (for example an email containing output)	Mandatory	ARES	Ares reg. nr	n/a	electronic	
Mission reports	Optional	ARES	Ares reg. nr	n/a	electronic	
Project progress reports (agreed with and to be sent to customer)	Mandatory	ARES	Ares reg. nr	e-Signatory	electronic	
Project progress reports (JRC internal)	Optional	Project Working file	n/a	n/a	electronic	
Results of scientific experiments/calculations/modelling	Mandatory (where applicable)	Project Working file	n/a	n/a	electronic	
Correspondence requesting customer satisfaction assessment	Mandatory (where applicable)	ARES	Ares reg. nr	e-Signatory	electronic	
(Filled-in) "Quality of content" checklist	Mandatory (where applicable)	PUBSY	n/a	n/a	electronic	
(Filled-in) "Quality of format" checklist	Mandatory (where applicable)	PUBSY	n/a	n/a	electronic	
Monitoring of the working hours	Mandatory	TAS2	n/a	e-Signatory	electronic	
…						