



**Council of the European Union**

General Secretariat

Directorate-General Communication and Document Management

Directorate Document Management

Directorate-General Administration

Security, Safety and Communication and Information Systems

Directorate Communication and Information Systems

The Data Protection Officer

**STAFF NOTE**

CP 76/15

Brussels, 8 December 2015

**Subject: Access to professional information on home drives, Outlook mailboxes and other office equipment of absent or departing staff**

This staff note concerns all staff who are leaving the GSC, are moving posts within the GSC, or are absent from their office for whatever reasons.

When leaving the GSC (retirement, transfer to another institution, end of contract of agents, etc.), you will be required to remove from your home drive ('D-drive'), Outlook and from any GSC device any data not relating to your job. Information created or handled for work purposes belongs to the Council/European Council or the GSC (see the [IOLAN Code of Practice](#)).

Emails received and sent in the context of professional activities are professional data that belong to the GSC and that must be made available to colleagues taking over tasks and files. This means that you are responsible for ensuring that relevant sent and received professional emails are made available to your successors/colleagues/hierarchy when you leave the institution.

You will be informed one month before your departure date by your hierarchical superior of this obligation and the relevant steps to be taken as set out in the form in Annex I.

The above obligations also apply *mutatis mutandis* when changing posts within the GSC. Professional data and communication relating to tasks and files must be made available to your successor/hierarchical superior before moving to your new post containing all relevant documents and correspondence.

Under certain conditions and in the interest of the service, the appointing authority may need to have access to professional data located in office equipment in the absence of staff. The applicable procedures are set out in Annex II.

Current IT tools only provide limited functionality to manage emails directly, e.g. by including emails in files. Therefore we recommend you manage your emails as efficiently as possibly by:

- deleting as many emails as possible (e.g. emails received for information, personal emails, etc.)
- moving emails relevant to a file out of Outlook to the common drive or AGORA: currently the best way is to save emails with relevance to a file in that file and to delete that saved email from your Outlook mailbox. We recommend you do this when you receive the email, rather than later.

If you need support or advice on how to best manage your emails, please contact DGF2 Document Management at [archives.centrales@consilium.europa.eu](mailto:archives.centrales@consilium.europa.eu).

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**Annex I :** Handover forms

**Annex II :** Applicable procedures

**HANDOVER OF PROFESSIONAL DATA ON COMMON DRIVES AND IN EMAILS BEFORE  
THE DEPARTURE OF STAFF**

You are leaving the institution on . . . . .

In order to facilitate the handover of the files/tasks you are working on, you are requested to complete the following procedures:

- prepare handover of notes and files you are presently working on, containing all relevant documents and correspondence. For this purpose you are requested not to delete professional emails and documents that you deem of relevance for the service,
- select and delete professional e-mails that do not need to be kept anymore for professional purposes. For criteria on which emails to keep, see the DFM policy for orientation.

In addition, in order to avoid any loss of private data that you may have lodged in your PC, you are requested:

- to clean all non-work related e-mails from your e-mail account i.e. belonging to you and not to the GSC, either by deleting or by transferring them to a private device.
- to clean all non work documents or files, including photos, music or software you may have stored in your IOLAN account, in your workstation or in other GSC devices.

Please be aware that after your departure, your hierarchical superiors or any person designated by them may have access to your email account and any other data stored by you in your workstation or in other GSC devices if this is justified in the interest of the service (e.g. to ensure business continuity or to implement the legal obligations of the GSC/Council).

Therefore you are required to carefully perform the actions mentioned above. Be aware that before your departure you will be required to sign the attached statement.

**STATEMENT TO BE SIGNED BY ALL DEPARTING STAFF AS REGARDS THE HANDOVER  
OF THEIR IOLAN ACCOUNT AND IT HARDWARE**

I acknowledge that I have been made aware of my obligation to remove all non professional related data from my IOLAN account, including but not limited to, emails, documents and any other kind of files or software.

I am aware that after my departure my hierarchical superiors or persons designated by them, may have access to my email account and to any other data stored by me in my workstation or in other GSC devices.

I hereby declare that I have removed from my IOLAN account all non professional related data and therefore, that all emails, documents or other files that may still be stored in my IOLAN account belong to the GSC.

Done at Brussels, on

(Date and signature preceded by "Read and approved")

(Copy to be sent to the Records Management and Central Archives Unit)

**PROCEDURES IN RELATION TO ACCESS TO HOME DRIVES AND OUTLOOK (MAILBOXES)  
OF ABSENT STAFF**

Whenever the interests of the service so require, the Appointing Authority has the right of access to office equipment and professional information handled by staff members and stored on individual PC workstations, central servers and/or in electronic mailboxes. For that purpose, the following procedure is applied in the absence of a staff member:

- The Head of Unit (HoU) or Director of the absent staff member will inform him/her of the need to access such equipment and afford him/her the opportunity (if feasible) to come to the office and provide the information needed.
- If the absent staff member cannot be contacted, does not reply to the request or is not able to come to the office, the HoU or Director conveys a formal request in writing or by email to the Director of DGA CIS requesting the necessary technical assistance to access the information required and the purpose of such access. Copies of the request will be sent to the Data Protection Officer (DPO) and to the absent staff member.
- Access to the information required will be performed in the presence of a member of the DPO's staff. The information may be copied by electronic means.
- After the information has been retrieved, the HoU or Director of the absent staff member will notify him or her (with a copy to the DPO and the Director of DGA CIS) indicating the date, time and purpose of the access, as well as the information consulted and/or retrieved.

## **PROCEDURES IN RELATION TO ACCESS TO LOGS OF A COMMON DRIVE**

Sometimes GSC services feel the need to access the logs of the common drive in order to identify certain activities which could prove problematic or detrimental to the service (for instance, repetitive disappearance of a file or document).

For that purpose the following procedure is applied:

- The HoU or Director responsible for such common drive conveys a formal request in writing or by email to the IT Helpline, with a copy to the DPO, requesting log information about a concrete action or incident, stating the reasons why such log information is needed. The DPO should give its opinion prior to such information being disclosed to the HoU or Director.

This procedure is not intended to amount to an inquiry into the behaviour of a staff member, since more often these occurrences are due to lack of technical knowledge and the staff member concerned is often not aware of them. If however there are some indications that the occurrences are intentional and that may amount to a breach of the staff member obligations, this procedure should not be applied and an administrative inquiry should be requested instead.

## **PROCEDURES IN RELATION TO ACCESS TO HOME DRIVES AND OUTLOOK (MAILBOXES) OF STAFF DECEASED WHILST IN ACTIVE SERVICE**

Two different situations should be considered:

1. Access by the service to the professional data of the deceased person:
  - Whenever the interest of the service so require, and given that the deceased person did not clear the home drive and the Outlook of his private documents, an "extracting procedure" should be performed in order to retrieve all the necessary professional information from the home drive and outlook of the deceased person. It is up to the HoU or Director to request such a procedure by sending a formal request in writing or by email to the Director DGA CIS requesting the necessary technical assistance. A copy of the request will be sent to the DPO.
  - Access to the information required will be performed in the presence of a member of the DPO's staff. The information may be copied by electronic means.
2. Access to private data by member of the family (heirs):

Sometimes the family members of the deceased staff request access to the home drive of the deceased either for sentimental reasons (e.g. family photos) or for more pragmatic reasons (insurance policies, etc.) For that purpose, the following procedure is applied:

- The family members should address themselves to the Social Unit which will examine the request and the legitimacy of the family member requiring it. Access to the information required will be performed in the presence of a member of the Social Unit and a member of the DPO's staff. The information may be copied by electronic means.
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