



EUROPEAN COMMISSION  
SECRETARIAT-GENERAL

The Secretary General

Brussels,  
CD / ARES (2015)

**NOTE TO DIRECTORS GENERAL, HEADS OF CABINET  
AND DIRECTORS OF EXECUTIVE AGENCIES**

**Subject: Document management and access to documents**

Good document management within the Commission is essential for our institution's efficiency and effectiveness. It facilitates the exchange and retrieval of information and allows the Commission to comply with the applicable regulations as regards, in particular, data protection, access to documents and information security.

In practice, retrieving important documents often takes too long because the documents are not properly registered, filed and preserved. Such shortcomings are both time and resource-consuming. They need to be addressed across the Commission, not least to avoid problems when handling a request for access to documents or when the Commission needs to provide documentary proof of its actions.

I therefore ask you to follow the document management rules ("eDomec rules<sup>1</sup>") and the attached guidelines at all times, so as to ensure that:

- all relevant documents, including e-mails, are captured and can be easily retrieved when needed, in particular when replying to a request for access to documents. You will notice that unregistered e-mails will be automatically deleted after 6 months from 1 July 2015.
- when processing a request for access, documents are searched only in Ares or in another document management system.
- all colleagues are aware of their responsibilities in this regard.

Should you have any questions in relation to these guidelines or document management more generally, the contact persons in the Secretariat General are [redacted] and [redacted].

Catherine Day

Cc: [redacted] (EEAS)

Annex: guidelines on document management and access to documents

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<sup>1</sup> Commission Decisions 2002/47 (OJ L 21/2002) and 2004/563 (OJ L 251/2004) and their Implementing Rules (SEC (2009) 1643)

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

### 1) Document registration

In accordance with the Commission Decision on document management<sup>1</sup>, 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<sup>2</sup> 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<sup>3</sup> 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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<sup>1</sup> Decision 2002/47, art 4

<sup>2</sup> Annex IV.3 of SEC (2009) 1643. See also the practical registration criteria in annex

<sup>3</sup> In the sense of Regulation 1049/2001 (OJ L 145/2001), art 4

## Practical registration criteria

It is impossible to draw up a definitive list or typology of documents with clear and unambiguous rules for what must be registered and what not. The question of whether or not to register a given document can only be answered by **analysing it in context**.

This analysis must be applied to all documents, **whatever their medium**.

However, analysing a document does not necessarily entail detailed scrutiny of its content.. On the contrary, in most cases a brief study, or even a cursory glance, is sufficient to arrive at a conclusion. This is particularly true as experience of registration, and of the types of documents usually dealt with, is built up within the Commission's services.

In order to help to build up such experience, and for use in less clear-cut cases, the following questions aim to provide a step-by-step guide to analysing documents. **If the answers to all of the following questions is "yes", the document needs to be registered** in the relevant corporate document management system.

### 1. Has the document been "drawn up or received" by the institution?

A document is considered as "drawn up" if it is **approved as ready** for transmission by the author, i.e the person who signs it or takes responsibility for its content.

A document is considered as "received" if it has been **intentionally delivered to the Commission** by the (external) sender.

### 2. Is the document related to the policies, activities and decisions falling within the institution's sphere of responsibility?

Documents related to one's personal situation should not be registered.

### 3. Is the information contained in the document important and not short-lived?

Information is unimportant and short-lived if losing it would have no negative administrative or legal effect for the Commission. A document which requires action or follow-up or involves the responsibility of the institution is important.

#### Examples (non exhaustive):

Yes	No
<ul style="list-style-type: none"> <li>- formal notes/communications, both received and sent</li> <li>- financial documents (as per BUDG guidelines)</li> <li>- minutes of meetings, especially with other institutions or external stakeholders, and, for important meetings, briefings/speaking/defensive etc.</li> <li>- information received/sent from/to other institutions or external stakeholders</li> <li>- contributions to interservice consultations or pre-consultations</li> <li>- documents, even informal (e-mails or notes to the file) that attest situations or events, justify decisions made or otherwise explain the development of official actions</li> <li>- instructions notes, guidelines</li> </ul>	<ul style="list-style-type: none"> <li>- drafts (i.e documents not yet validated by the person who will sign them or take responsibility for them)</li> <li>- e-mails and other texts circulated within an informal exchange of views between colleagues.</li> <li>- exchanges on short lived matters (such as invitations)</li> <li>- information on one's personal situation</li> </ul>

### 3) E-mails

**The abovementioned registration criteria defined in the eDomec rules apply to E-mails<sup>4</sup>.**

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<sup>5</sup>. 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<sup>6</sup>, 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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<sup>4</sup> 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.

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

<sup>6</sup> This should be done by the Information Resource Managers (IRMs) in close coordination with the DMOs

#### 4) Importance of correct registration and filing for access to documents

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<sup>7</sup>.

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<sup>8</sup>.**

#### 5) Need for a change in administrative practices

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)<sup>9</sup>.
- **Implementation of Internal Control Standard n°11<sup>10</sup>**, 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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<sup>7</sup> Regulation 1049/2001, art 2.3 and 3a)

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

<sup>9</sup> 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).

<sup>10</sup> **Standard:** 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. **Requirements:** 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.