# e-Domec:
# An introduction to document management in the Commission

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*Learning and Development*

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# Contents

# INTRODUCTION: PRESENTATION OF THE MANUAL AND OF COURSE OBJECTIVES

This manual is intended for participants in the training course entitled "e-Domec: An introduction to document management in the Commission".

This course is intended for newcomers at the Commission or staff members desiring to have an overall view of the subject. The overall aim of this course is for participants to become familiar with, and able to apply, current European Commission policy on the management and retention of documents and files.

The manual, which is issued to participants at the end of the course, summarises all the points addressed during the course, and should enable participants to find all the necessary information they may need in order to:

- understand the importance of following rules to easily find the useful information
- know their own responsibilities for document and file management
- facilitate collaboration between agents

**For any further information, please contact your DMO (Document Management Officer[1]) or your COFO (Training Coordinator)**

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[1] List: http://www.cc.cec/home/dgserv/sg/edomec/index.cfm?lang=en&page=photosdmo

# I. CONTEXT AND OBJECTIVES

An institution such as the European Commission is both a producer and a user of information. In order to rationalise the production, retention and access to documents drawn up and received in the course of its activities, as from January 2002 the European Commission has established a records management policy: **e-Domec** (Electronic archiving and Document Management in the European Commission). This policy also applies to the Executive Agencies and the European External Action Service.

## 1. Several objectives, a single policy

Proper records management ensures that departments retain records of their activities in order to

- ensure they have robust, legally admissible evidence of their work;
- provide accountability and transparency for their actions and decisions;
- guarantee rapid and easy access to information; amongst other benefits, this means that decisions can be taken as rapidly as possible;
- reinforce security;
- improve the quality and continuity of public service;
- reduce administrative costs and save time.

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**e-Domec**: Electronic archiving and Document Management in the European Commission.

This records management policy was formally launched by the Commission in January 2002, with the adoption of the basic normative framework establishing the rules and procedures of records management (Commission Decision 2002/47).

*e-Domec* is designed to ensure:
- preservation of the European Commission's institutional memory;
- an improvement in the quality of files within units;
- greater standardisation of procedures: rules and procedures common to all Directorates-General/Departments;
- monitoring and accountability to oversight bodies (IAS, OLAF, European Court of Auditors, European Parliament);
- transparency with regard to European citizens;
- the integration of ICT (Information and Communication Technology) and evolution towards the e-Commission with the introduction of electronic archiving.

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# 2. Legal foundations and obligations

These texts may be consulted via the *e-Domec* Intranet website.

## 2.1. DIRECT LEGAL TEXTS

➢ **2.1.1. Fundamental decisions**

♦ **Commission Decision 2002/47/EC, ECSC, Euratom**

Provisions concerning document management

♦ **Commission Decision 2004/563/EC, Euratom**

Provisions concerning electronic and digitised documents (DOCELEC)

➢ **2.1.2. Implementing rules for the founding texts**

♦ **Implementing rules for Decision 2002/47/EC, ECSC, Euratom on document management and for Decision 2004/563/EC, Euratom on electronic and digitised documents: SEC(2009)1643**

♦ **Common Retention List (CRL): SEC (2007) 969-970**

Regulatory document that sets retention periods for the various types (also called "categories") of Commission files.

## 2.2. ASSOCIATED LEGAL TEXTS

➢ **Internal control standards for efficient management**

Of the 16 internal control standards, six have direct repercussions on obligations regarding records management in Directorates-General and departments:

- **n°6:** "Risk management process": risk management encompasses the protection of information.
- **n°8:** "Processes and procedures": drawing up adequate documentation on the operational and financial processes and procedures implemented by a DG, and on information systems. This documentation must be user-friendly, accessible and kept up to date.
- **n°9:** "Management supervision": Management at every level supervises the activities for which it is responsible and keeps track of the main problems identified. This managerial supervision covers matters of legality and regularity, as well as operational performance.

  In particular, a unit manager must be able to guarantee that a reliable and comprehensive official file exists for every case on which her/his unit is Lead Department.
- **n°10:** "Business continuity": Appropriate provisions must be in place to ensure continuity of service in the event of a "normal" interruption of activity. This includes transmission files and backup systems for financial transactions and operational activities.
- **n°11**: "Document management": Appropriate procedures and processes must be in place to guarantee safe and effective document management, in particular to ensure that the necessary information can be readily found. This standard entails that any document meeting the conditions set out in the implementing rules must be

registered, filed in an official file and retained for the period stipulated by the document management rules.

It is essential in particular to guarantee that all staff are familiar with registration, filing and retention procedures and apply them in practice in the Directorates-General and departments.

- **n°13**: "Accounting and financial reporting": Adequate checks and procedures are in place to guarantee that accounting data and related information used in the preparation of the organisation's annual accounts and financial statements is accurate, comprehensive and available in timely fashion. This implies an obligation for all staff concerned to keep accounting and financial documentation up to date and accessible.

## ➢ Provisions on security

**Commission Decision 2001/844/EC, CECA, Euratom,** dated 29 November 2001: Introduction of a global security system for all fields of Commission activity requiring a certain degree of confidentiality, and determination of the conditions applying to the management of classified EU information.

## ➢ Provisions on the protection of personal data

**Regulation (EC) n° 45/2001** of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by Community institutions and bodies and on the free movement of such data.

## ➢ Public access to documents

Rules setting out the general principles and limits governing exercise of the right of access to documents held by the Commission (drawn up or received by the Commission and in its possession):

- **Regulation (EC) n° 1049/2001** of the European Parliament and of the Council, regarding public access to European Parliament, Council and Commission documents.

## ➢ Opening of Historical Archives to the public

**Regulation n°1700/2003** of the Council amending Regulation (EEC, Euratom) No 354/83 concerning the opening to the public of the Historical Archives of the European Economic Community and the European Atomic Energy Community.

## ➢ Financial regulation

**Regulation (EC, EURATOM) n° 1605/2002**: basic precepts and rules governing the Community budget: budgetary and financial management, keeping and presentation of accounts, public procurement and the award of grants, liability of authorising officials, accounting officials and internal auditors, and arrangements for external control and the discharge procedure.

## ➢ Code of good administrative behaviour

Principles on which relations between the public and the Commission must be founded: lawfulness, non-discrimination, proportionality of measures to the aim pursued, consistency in administrative behaviour.

- **Decision 2000/633/EC**, CECA, Euratom, of 17 October 2000: Code of good administrative behaviour for staff of the European Commission in their relations with the public.

➢ **EMAS**

The Eco-Management and Audit Scheme

- **Regulation (EC) n° 761/2001**: a Commission environmental management programme aimed at reducing consumption of resources and the generation of waste. Compliance with archiving rules can have significant environmental impacts.

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**Pursuant to these texts, all DGs and Departments (including Cabinets) must**:

▪ **Register** all documents received or formally drawn up as part of their activities
- *Decision 2002/47 – Article 4 of the annex*
- *Implementing rules – SEC (2009) 1643:* Chapter II.2 - Registration

▪ Establish a **filing plan** and set up **files**
- *Decision 2002/47 – Article 5 of the annex*
- *Implementing rules – SEC (2009) 1643:* Chapter II.3 - Filing

▪ **Retain** the documents and official files that are related to their responsibilities
- *Decision 2002/47 – Article 6 of the annex*
- *Implementing rules – SEC (2009) 1643:* Chapter II.4 - Retention
- *Common Retention List – SEC (2007) 969-970*

▪ **Appraise and transfer** their files to the Commission's Historical Archives as per the Common Retention List
- *Decision 2002/47 – Article 7 of the annex*
- *Regulation 1700/2003 – Article 7*
- *Implementing rules – SEC (2009) 1643:* Chapter II.5 – Appraisal and transfer to Historical Archives

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## 3. Actors in records management

Records management is part of everyday responsibilities and concerns everyone at the Commission:
- ▪ the Commission as an institution;
- ▪ the Directorates-General;
- ▪ equivalent departments, Cabinets, Offices, Delegations, etc.

Executive agencies also apply the e-Domec rules[2].

➢ **The e-Domec Steering Committee**

The Steering Committee is a group of seven Directors-General holding office in turn.

The mission of the Steering Committee is to:
- ▪ approve the implementation strategy for the e-Domec policy, which stems from the administrative reform launched in 2000 by the Prodi Commission, and to set priorities;
- ▪ oversee the monitoring and quality of overall project implementation;

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[2] Unless otherwise specified, the abbreviation "DG" in this manual covers all the departments mentioned above.

- clarify as necessary the responsibilities of each individual for execution of the proposed measures;
- draw up a multi-year action plan, based on proposals from the Interdepartmental Group of Document Management Officers, and ensure its regular updating.

## ➢ The e-Domec team (Secretariat-General)

The e-Domec team (Secretariat-General) is responsible for coordinating actions and monitoring the implementation of standards governing records management.

The mission of the e-Domec team (SG.B2) is to:

- establish the implementing rules for the registration, filing, retention, appraisal and transfer of documents and files to the Historical Archives;
- defining, in conjunction with DIGIT, the functional specifications of IT applications;

## ➢ Role of DMOs (Document Management Officers)

*Article 10 Decision 2002/47*

- Mandatory: 1 per Directorate-General/Department
- Recommended: 1 DMO and 1 Deputy DMO

The DMO's mission covers:

- the design and introduction of the records management and archiving system in the DG: adaptation of general rules to the specific characteristics of the DG;
- training, information and advice for DG departments and officials;
- verification of the proper application of rules and procedures;
- crosscutting coordination with the CADs and/or network of DMO correspondents in the DG;
- interdepartmental coordination with DMOs in other DG/Departments;

## ➢ Role of the Document Management Centre (known under the French acronym: CAD) and equivalent services

*Article 9 Decision 2002/47*

- Their mission is to
  - guarantee that documents received or drawn up by each DG or equivalent department are managed according to the rules;
  - manage, organise and retain documents;
  - guarantee archive availability when needed;
  - apply the common retention list;
  - preserve the authenticity of documents;
  - apply the "Code of good administrative behaviour" in records management

➢ **Role of unit/department staff**

♦ **DMO correspondent in the Unit**

- Acts as the link between the unit and the DG Document Management Officer (DMO): participates regularly in correspondent network meetings (in certain DGs, the CAD is made up of the group of DMO correspondents);
- under the auspices of the head of unit and in concertation with the DMO, implements e-Domec rules on registration, filing, archiving, appraisal and transfer of files within the department ;
- provides training, information and advice to unit officials, and to newcomers in particular, on records management;
- alerts the head of unit and/or DMO in the event of failure to apply e-Domec rules;
- manages the unit's list of official files: creation, management and closure of official files in Ares (via Nomcom3);
- manages the storage plan: organises the physical retention of official paper files to guarantee their protection;
- implements retention rules for closed files, in accordance with the archive schedule.

♦ **Document managers**

- Apply the rules governing records management and archiving;
- Responsible for the registration, filing and retention of documents, regardless of medium, in the systems provided for, under the supervision of the DMO (Document Management Officer) or of the head of the Document Management Centre (CAD);
- File documents in files;
- Communicate the files and documents required for the work of the unit/department;
- Receive, retain and locate documents and files for ease of access by those concerned.

# II. PRINCIPLES OF RECORDS MANAGEMENT

## 1. Basic concepts

The records management system must make it possible to organise, find, protect and retain documents recording the activities of the institution.

In order for the records management system to meet these objectives, it is essential that:

- documents of importance to the Commission should be identifiable, understandable and secure: **registration**;
- documents can be linked to the context in which they were received or produced: **creation of files**;
- useful documents and files can be found easily: **filing** in official electronic files and possible **storing** in supplementary official paper files;
- files are retained in a reliable and continuous manner throughout their life cycle: **retention**;
- files with no further administrative use are eliminated or transferred to the Historical Archives in accordance with the **Common Retention List**.

## 2. The records life cycle and the administrative cycle

The **life cycle** of a file corresponds to the stages or periods in the life of the file from its "birth" (creation or receipt by the department) and throughout its administrative processing until it is transferred to the Historical Archives or destroyed in accordance with regulations.

The life cycle is divided into **3 stages**:

- **Current records or open files**: official files open and in use by the departments that produced them.
    - Official electronic files are managed by e-Domec compliant applications (the shared hard drive is only storage space, and has no probative value).
    - Official paper files are generally retained in the offices or in close proximity.
- **Intermediate records**: closed files which must continue to be retained for administrative or legal reasons (for inspection, for example). DGs retain these files, in accordance with their archive schedule, throughout their administrative retention period (ARP). In the case of hybrid files (containing both electronic and paper files), the paper archives must be retained in an area specifically designed for the purpose.
- **historical records**: closed files which, depending on the appraisal rules applicable, are transferred to the Commission's Historical Archives Service (HAS) and selected for permanent retention in view of their historic interest.

⇨ In parallel to the life cycle, records also have a corresponding **administrative cycle** that covers the various stages of records management:

# Document and file life cycle and administrative cycle

**Receipt or creation of documents**

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**Analysis and registration of the document**

↓

**Filing: Organisation of documents into files**

↓

**Storage/Consultation/Distribution**

} **Constitution and use of CURRENT RECORDS:** Files used regularly in the management of current cases

↓

**Closing of files**

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**Retention of closed files during their ARP (Administrative Retention Period)**

} **Management of INTERMEDIATE RECORDS:** Files closed but retained for administrative or legal reasons

↓

**Appraisal**

↓ ↓

**Elimination**   **Transfer to the Historical Archives**

} **Selection and transfer to DEFINITIVE ARCHIVES** Files with no further administrative value but retained definitively in view of their historical or political value

# III. DOCUMENT REGISTRATION

## 1. Why register?

**Registration** is the operation that attests to the administrative value of a document drawn up or received by a department as evidence of the activities, policies and decisions for which it is responsible.

Registration makes it possible to:
- identify the document with certainty,
- attest to the transmission and receipt of the document in accordance with established procedures,
- manage the document efficiently (assignment and follow-up) by guaranteeing its traceability throughout its life cycle,
- incorporate the document into the Commission archiving system and protect it from unauthorised modification or deletion
- quickly and easily retrieve useful information.

## 2. Analysis or identification of documents to be registered

Not all documents need to be registered: analysis of the content and context of a document received or drawn up is used to distinguish between:
- Documents that the department absolutely must retain because they contain important information, involve follow-up/action on the part of the Commission, have been endorsed and signed by the competent official and will form part of an official file.
- Documents that need not be retained and that are not subject to registration.

⇨ Any document, regardless of medium, must be registered if it meets 3 conditions:

① Received or formally drawn up by a Commission department as part of its activities

**and**

② **a)** Likely to involve action or follow-up, or to require a reply from the Commission or its departments

**or**

**b)** establishes a commitment for the Commission or its departments

**and**

③ Contains important information that is not short-lived

⇨ Documents drawn up to provide evidence of acts or intentions or to further understanding of the case should also be registered (for example: briefings and some "notes to the file").

| VERIFICATION OF REGISTRATION CONDITIONS |
|---|

① **Was the document formally drawn up or received by a Commission department as part of its activities?**

| Documents received: | Documents drawn up: |
|---|---|
| Check whether the document has been correctly received, i.e. is **available** to the department(s) to which it is addressed:<br><br>- document reaching the premises of the department<br>  or<br>- document handed to the official competent to handle the case to which the document refers<br>  or<br>- document handed to the official competent to receive and process incoming documents. | Check whether the document has been subject to **formal transmission** by its author (person or entity formally responsible for the document content), i.e. if it was considered ready for transmission to its final addressee (individual, department or information system).<br><br>⇨ Registration is the final operation before sending on the document to its final addressee.<br><br>**N.B.**: A document ready for transmission is not necessarily the final version of the document; Significant drafts of a document may also be considered ready and be subject to registration. |

**and**

② **Does the document involve action, follow-up or reply, or is it binding upon the Commission or its departments?**

Any document on a subject relating to the policies, activities or decisions of the Commission or its departments is binding upon the Commission.

**and**

③ **Does the document contain important information that is not short-lived?**

Any document that contains important information that is not short-lived must be registered. Information is considered unimportant and short-lived (i.e. useful for only a very short period of time):
- if the loss of the information involves no negative administrative or legal impact on the Commission,
- or if its value is clearly only temporary and destined to disappear shortly (in less than six weeks),
- or if its value is clearly ancillary (it is not the main information) or instrumental (it is only a means of implementing an action defined in another document).

**or**

④ **Has the document been drawn up as effective administrative or legal witness to acts, situations, intentions or events associated with the activities of the Commission and its departments?**

**Any document that meets these conditions must be registered by the department concerned.**

⇨ For precise information on the documents that must be registered, contact the **DMO** (Document Management Officer), who is responsible for defining the practical procedures implemented by the DG in accordance with the regulatory texts.

## 3. Role of the file manager

The file manager plays an essential role in ensuring compliance with registration requirements. The file manager must:

▪ transmit or indicate to the department/individual responsible for registration all documents to be registered

▪ remember to have "certifying" e-mails registered

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**Rules for the composition of "certifying" e-mails"**:

E-mail is an increasingly important tool for swift, easy communication. It can be used to replace simple spoken communication or telephone calls (informal e-mail), but can also be used for formal written communication, both internal and external (certifying e-mail).

⇨ A certifying e-mail is a document that is binding upon the Commission (formally received or drawn up by a Commission department as part of its activities): as such, it must be registered.

As with any administrative document, there are certain basic principles of composition to be known and respected:

1) 1 single topic

2) 1 significant object

3) Clear identification of the author and signatory: use of a "signature block" or visiting card

4) Clear identification of the main addressee: full name and address in the address book or indication in the addressee message header (on the same principle as a printed letterhead)

5) Indication in the body of the message of the list of attachments (attachment name and document titles)

6) Indication, where necessary, of whether the paper document follows by post

7) Indication of the registration number in the object of the e-mail

**Registration of an e-mail with attachment(s)**

Any attached documents are also registered under the same registration number.

**Registration of a series of e-mails**:

In the case of a series of successive e-mails on the same subject, only the final e-mail can be registered, with no retroactive registration of preceding e-mails (each being not significant independent of the others). In this instance, the registration metadata are those of the final e-mail.

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▪ Check regularly that the official file is complete

**Useful hint**:

To check whether this is the case, ensure that all documents that may be useful in the event of:

- disputes

- audit

- transmission of the file

have been registered.

# Document analysis and registration

1) Is this a **formally drawn up or received document**?
   a. <u>Formally drawn up document</u>: ready for formal transmission to its final addressee
   b. <u>Formally received document</u>: available to the department competent to deal with the case or to receive and deal with the document
2) Is it likely to involve **action, follow-up or a reply** from the department/is it **binding** upon the Commission or its Departments?
3) Does it contain **information that is important and not short-lived**?

**YES**

**NO**

- **REGISTER in the Register**
- **Input the metadata**

**To be retained?**

**YES**     **NO**

**SAVE**

**END**

**To be filed?**

**YES**     **NO**

Quote the **CODE for the file(s) in which the document is filed**

**END**

# 4. Registers and applications with equivalent effect

The operation of registration is carried out in **registers**: databases containing the metadata of documents registered by the departments.

## 4.1. REGISTERS

A register is an administrative instrument recording the receipt and sending of documents that are complete and correctly constituted in legal or administrative terms, and their proper transmission.

A distinction is made between:

- The **general register**: used for the registration of incoming, outgoing and internal correspondence and notes to the files (**Ares** at the Commission headquarters and **Delores/Adolight** in the Delegations)

- **Specific registers**: used to register documents subject to specific procedures without having to re-encode them in the general register (guarantees equivalent to the general register: inclusion of minimal metadata, audit trail for modifications, security in the event of system failure).

  Examples
  - **ABAC Contracts**: Management of contracts involving a financial commitment (invoice follow-up)
  - **Basil:** Management of parliamentary questions in Commission Departments and Cabinets and search engine on parliamentary questions
  - **CHAP:** Registration and management by the SG of correspondence involving complaints
  - **Delores** : general register for the registration of incoming and outgoing correspondence in the Delegations
  - **e-Greffe**: transmission and management of the Commission's decision-making procedures
  - **EU Pilot:** exchange of information with member States as part of checks on the application of Community law
  - **Gestdem:** workflow management for requests for access to European Commission documents (initial and confirmatory requests and resulting complaints to the Ombudsman)
  - **Sybil**: management of relations between the President's Cabinet and the DGs on drafting replies to correspondence addressed to the President.
  - **Tsar II** (Tracking Smart Assistance Request) : management of briefings for Commissioners and Directors-General.

## 4.2. APPLICATIONS WITH EFFECT EQUIVALENT TO THE REGISTER

This corresponds to applications that do not have all the characteristics of a register but that are sufficiently reliable to be used as such for the purposes of identification and filing.

  Examples
  - **CIS-Net**: system for monitoring the official stages of transmission and processing of interdepartmental consultations (launch, contributions, replies, closing).
  - **SG Vista**: information system managed by the Secretariat-General, giving access to non-classified documents of the Commission, the European

Parliament and the Council and making it possible to follow the progress of internal and inter-institutional procedures and parliamentary questions.

- **MIPS:** Logistics management for missions
- **Poetry:** Management of translation requests
- **Syslog**: Management of professional training programmes (creation of courses, enrolment, assessments, etc.), with filing in individual files (the file code is the employee number).
- **Sysper2**: information system for managing the Commission's human resources. Management of all aspects of career development, with filing in individual files (the file code is the employee number).
- **Webdor-Presto:** Webdor is an application for managing conference room bookings. It displays the list of bookings and details of each individual booking. Presto offers the same features for drinks orders.

⇨ **A document must be registered <u>once only</u>, in the appropriate register.**

## 4.3. SAVING A DOCUMENT

A document that does not meet the conditions for official registration may be simply **saved**.

The aim is to notify the existence of a document in order to retrieve it easily: this simple notification is not a registration. It does, however, allow for documents to be filed in the files as supplementary information.

⇨ Using the "Save" function in Ares depends on procedures established in the DG or the Department:
- transmission of a document for comment/modification and signature (workflow function with e-signatory),
- identification of information or working documents,
- notification of documents registered in specific registers, etc.

# IV. FILING: FILES AND FILING PLAN

## 1. Why file?

> **Principle of filing**:
> ✓ Documents are drawn up or received as part of a **case**.
> ✓ To simplify the management and retrieval of all documents relating to a particular case, they must be associated within a single **file** to which a unique identification code is assigned.
> ✓ In order to simplify the retrieval of electronic files, they are allocated to an appropriate heading of the **filing plan**.
> ⇨ For each case dealt with by a Lead Department, there must be a complete and reliable official file.
> ⇨ Every document registered must be filed in an official file.
> ⇨ **The real working instrument is the file.**

Files that are properly managed, complete and reliable can be used to:
- retrieve useful information rapidly
- rationalise tasks
- support collaborative work
- ensure accountability
- facilitate mobility

## 2. Official file and working file

- **Official file:** a single file managed by the Lead Department responsible for the file and containing all the supporting documents relating to a case.
  - ⇨ Each official file must be complete: it must contain at least all the officially registered documents relating to a case, and any other document useful in handling the case.
  - ⇨ It constitutes evidence and must be retained.
  - ⇨ It must be subject to inspection and audit.
  - ⇨ It will be checked prior to closure and then, at the end of the administrative retention period, will be transferred, if appropriate, to the Historical Archives for retention and public consultation.

- **Working file (or information file)**: file created for working purposes, with content determined by the officials responsible for compiling it. It is used to retain documents that have not been registered but that have some short-term usage. They may include: copies of documents, non-finalised versions of documents, documents not subject to registration requirements (collections of notes, technical reference material, copies of articles, telephone call logs, non-certifying e-mails, drafts, etc.)
  - ⇨ working files have no legal value.
  - ⇨ they might be destroyed at any time without the loss of essential information.
  - ⇨ they will be eliminated on closure of the file and excluded from the intermediate records.

# Official file and working file

Document …

```
                                                           ┌─────────────────────────┐
  ⬦ relates to            yes   [register ▶] [▶]           │                         │
    /documents a decision                                   │                         │
        │ no                                                │      Official file      │
  ⬦ responds to a         yes   [register ▶] [▶]           │                         │
    legal or financial                                      │                         │
    requirement                                             │                         │
        │ no                                                │                         │
  ⬦ is necessary          yes   [───────────▶]             │                         │
    to understand the work                                  └─────────────────────────┘
    covered by the file
        │ no
  ⬦ is a convenience      yes   [────▶]            ┌──────────────┐
    copy                                           │              │
        │ no                                       │   Working    │     You
  ⬦ provides background reference material         │   files      │     may
    but does not have any impact   yes  [────▶]    │              │     destroy
    on the piece of work covered by the file       │              │     when
        │ no                                       └──────────────┘     you
  ⬦ is a personal         yes   [────▶]      ┌ ─ ─ ─ ─ ┐           don't
    document                                 │ Personal │          need
                                             │  files   │          them
                                             └ ─ ─ ─ ─ ┘           any more
```

# 3. Lead Department responsibility

For each file, there is a "**Lead Department**" ("Chef de file") in which a member of staff designated as "**file manager**" is responsible for the day-to-day management of the file.

The Lead Department is responsible for the case, even if other units may be involved in ancillary tasks or providing assistance.

The responsibility for creation and retention of the file relating to a case lies with the Lead Department.

⇨ The Lead Department is responsible for:

- **Creating** a new file when a case is opened.
- **Managing** the file: the Lead Department on the case is responsible for filing each registered document in the corresponding official file.
- **Closing** the file on conclusion of the case.
- **Retaining** the file during the Administrative Retention Period (ARP) or storing it in the DG Central Archives (depending on the internal organisation as regards the retention of intermediate records).
- Collaborating with the DMO on the first **review of files** and their **possible transfer to the Historical Archives**.

## 3.1. CREATION OF AN OFFICIAL FILE

An official file must be constituted for each case falling within the remit of the DG or Department.

A new file must be created whenever a new case is opened i.e. when a registered document is not linked to a current case and therefore cannot be filed in a current file. We advise against creating a new file before having at least one document to file (too many created files remain empty), except in the case of serial files.

A new official file must be created in **Ares (via NomCom3)**. The creation of a file involves filling out descriptive information (metadata) about the file :

1) Heading for attachment to the filing plan
2) File codes: internal management code. Ares/NomCom automatically allocates a unique code to each new file. DGs may also choose to give the file a code specific to the DG.
3) File name or title (designation): this must be clear and meaningful
4) Identification of the Lead Department, including successive Lead Departments where necessary
5) Date of creation.
6) Date of closure (is filled in when the case is completed)
7) File status: 4 possible status levels:
   - active (new documents can be added to the file)
   - closed (no further documents can be added to the file)
   - transferred (to the Historical Archives)
   - destroyed (by the DG or the Historical Archives)
8) File content: comments on the file content.
9) Level of classification: assignment of the appropriate security level.
10) File category: code of the category of the CRL the file belongs to.

♦ **File title**

⇨ It is a fundamental element that will be used to identify the file throughout its life cycle, including when it is transferred to the Historical Archives.

The file title must be clear, meaningful and succinct:

- It should reflect the action and be sufficiently informative without the need to read the documents it contains.
- It should simplify the task of filing documents.
- It should indicate when the file is to be closed.
- It serves as a search criterion.

⇨ The choice of file title depends on the type of file.

**1 - Action files** arise from one-off or unique cases, the duration of which is not known in advance but for which the procedural action that will make it possible to close the case is clearly determined.

Examples of such actions:

Monitoring a research project

Call for tender procedure

⇨ Creation of an **action file** (or case): concerns a specific case, beginning and ending at a precise and clearly identifiable moment.

Examples of scopes:

Monitoring a research project: completed when the final report is presented and the final payment is made

Call for tender procedure: completed once the successful bidder has been chosen

⇨ **Action file title**: Compose a title that is explicit, as regards both the subject of the file and the action required on that subject.

Examples of action file titles:

Development of the manual on filing documents and files at the Commission"

Adoption of legislation on the validity of electronic documents"

**2 - Serial files** arise from work of a repetitive nature, the duration of which is generally linked to a calendar or budget year and which always proceeds in the same way.

Examples of recurrent works:

AMP (Annual Management Plan): a new AMP must be drawn up every year

Determination of a training programme: linked to a budget year

⇨ Creation of a **serial file**: repetitive in nature and must be open to specific identification to simplify the operations of closure and duplication of the structure for the next serial file.

⇨ **Serial file title**: facilitate the distinction between action file and serial file by indicating the date (period covered) in the title of serial files.

Examples:

IT budget **2011** ⇨ Serial file

Annual Management Plan **2011** ⇨ Serial file

## 3.2. ATTACHMENT OF FILES TO THE FILING PLAN

> Filing a file involves choosing an organisation that ensures the best possible conditions of retention and access for managers and users.

All official electronic files must be attached to the filing plan.

⇨ They are filed under the appropriate heading of the filing plan: final-level heading of the filing plan specific to the DG.

### ➤ 3.2.1. Filing plan of the Commission, the Executive Agencies (EAs) and the External Action Service (EEAS)

The **filing plan** provides for the intellectual organisation of the official files of the Commission, the executive agencies and the EEAS on the basis of their activities, so that the files can be easily retrieved. It is a hierarchical and logical structure in the form of a tree structure by theme:

- composed of a fixed number of headings relating to the activities and missions of the Commission, the EAs and the EEAS, consisting of a hierarchy of several levels, from the most general to the most specific,
- identified by a title and a numeric code,

The filing plan consists of:

- the **common nomenclature**: **the first levels** are defined by the Secretariat-General.
- the **specific levels** : each Commission DG and department, EA and the EEAS must have a filing plan that represents their activities and is linked to the common nomenclature.

#### First level of the Nomenclature Commune:

01. Institution – Commission

02. Future of the Union and institutional questions

03. The Community economic and social area

04. Citizenship and quality of life

05. International relations

06. Financing of community activities and the management of financial resources

07. Community law

08. Press, communication and publications

09. Policy strategy and coordination per DG

10. Administration

12. External Action – Common foreign and security policy

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**The purpose of the filing plan is**:
- ➤ to give a global overview of all the activities of each department;
- ➤ to ensure consistency of filing systems: uniform identification of files handled by teams;
- ➤ to structure the constitution of files and facilitate the filing of documents in files in a logical manner;
- ➤ to facilitate searches for files and documents;
- ➤ to improve the quality and continuity of file follow-up, especially in the event of a change of Lead Department or assignment of the case.

---

➢ **3.2.2. Choice of the filing plan heading for new files**

The operation of filing files is performed when the file is created.

⇨ A **heading** is one of the branches making up the filing plan. It represents an **activity** carried out by a DG or an equivalent department. It is used to group a set of files of the same type.

⇨ A **file** is a set of documents relating to a single **case**. Documents dealing with the same case are grouped together for reasons of evidence, justification or information and to guarantee efficient working. The file exists physically in electronic and/or paper form.

3.3. THE OFFICIAL FILE MANAGEMENT TOOL: THE FILE LIST

The file list is managed via Ares. It contains the descriptions of each official file and is an everyday working tool that can be used to:

- draw up an inventory of the official files managed by the Commission;
- identify the Lead Department (chef de file) for each case;
- file documents in their corresponding file;
- enable searches for and access to files and documents;
- determine the retention period for each file;
- facilitate transfer to the Historical Archives.

# Headings, files and documents

03.11.03.011.001 Programming (3.11.03.02.01)
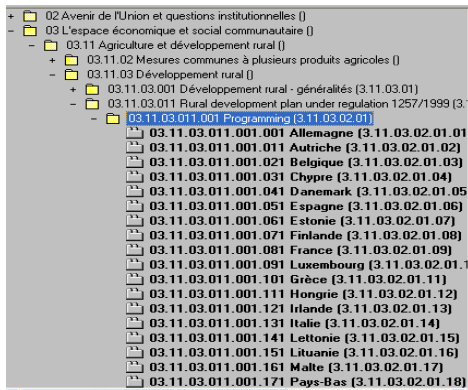
**Filing plan: composed of a hierarchy of headings**
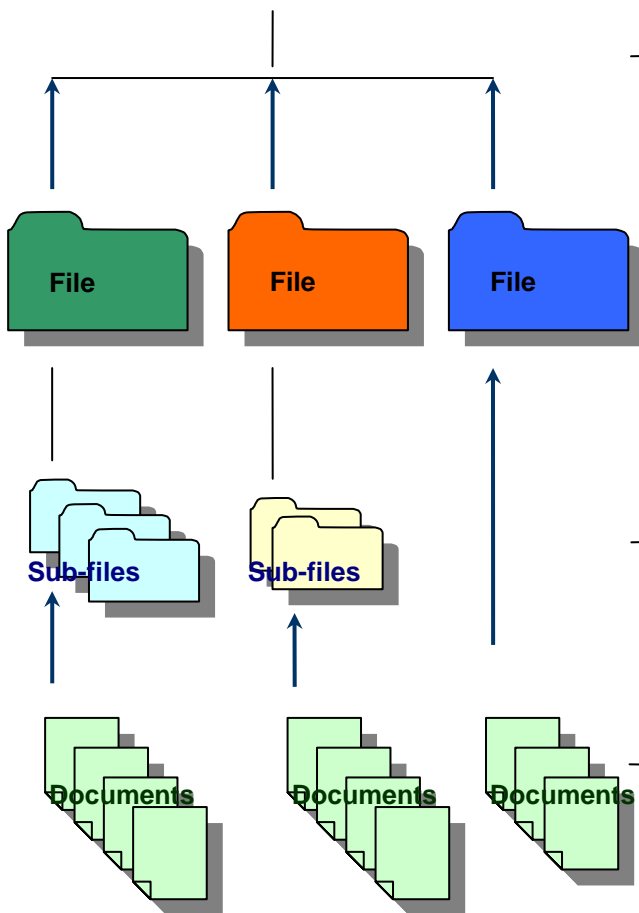
**Filing of files under specific headings of the filing plan.**
**A file may be linked to only one heading in the filing plan (final-level heading)**

**File**     **File**     **File**

**Sub-files**     **Sub-files**

**A file may be divided into sub-files to facilitate the organisation and consultation of documents**

**Documents**     **Documents**     **Documents**

**Filing documents in files or sub-files.**
- **If the file is divided into sub-files, the documents must be filed at sub-file level.**
- **A single document may be filed in one or more files.**

⇨ **A document is never filed directly in a heading of the filing plan but always in a file and the file is attached to a final-level heading in the filing plan.**

# 4. Filing documents

> Every registered document must be filed in an official file.
>
> A document that has not been registered may also be filed in an official file. This may apply in particular to documents that have simply been saved (Ares), but which are useful to an understanding of the case: simple working documents, documents registered in specific registers and flagged to make them easier to find, etc.

## 4.1. CHOOSING THE CORRECT FILE FOR FILING

Before filing a document in a file, an analysis must be carried out to determine which is the appropriate file.

The analysis may be conducted as follows:

| STAGES | | DESCRIPTION |
|---|---|---|
| 1 | Define the filing themes of the document | Read quickly though the document to identify the filing plan themes likely to correspond to the subjects addressed, the purpose, or the issuer of the document. |
| 2 | Rank these themes according to the subjects addressed | Depending on the subjects addressed, select the main theme that characterises the document. |
| 3 | Search for the corresponding electronic or paper file(s) | A document may be filed in several files when the information in the document relates to several cases. |
| 4 | File the document | Indicate the code of the electronic file(s) in the encoding sheet |
| 5 | Store the document (original documents, classified documents, documents that cannot be digitised, etc.) | Note the file code on the paper document and store the document in the corresponding paper file. |

## 4.2. ROLE OF THE FILE MANAGER

Filing, like registration, comes under the administrative responsibility of the Lead Department.

The file manager plays an essential role:

- ensuring that every registered document relating to the case for which he is responsible is filed in the correct file
- indicating to the person in charge of the filing operation in which file the document should be filed

⇨ A procedure must be established in the unit to define who files, and how; in practice, the file manager must pass the information on the file to be filed to the person responsible for filing in Ares.

# Analysis of a document to be filed

Is it a **registered** document?

**YES**

**NO**

**ANALYSIS OF THE DOCUMENT**
- Read quickly though the document to identify the **filing themes** likely to correspond to the subjects addressed, the purpose, or the issuer of the document.
- **Rank these themes** according to the subjects addressed
- **Search** for the corresponding electronic or paper files

**YES**

**BUT:**
- Does it contain **supplementary information for an understanding of the file**?
- Do I want to **keep** it?

**NO**

**END**

**Does/do the file(s) exist?**

**YES**

**NO**

**Give the CODE for the file(s)**

- **CREATE a file**
- **LINK the file to the corresponding heading in the filing plan**

# V. MANAGEMENT OF CURRENT RECORDS

It is important that files be properly retained and preserved, whatever the medium (electronic and/or physical), throughout their life cycle in order to:

- ensure the physical protection of files necessary to the existence and proper functioning of the Commission;
- guarantee the continuity of file management throughout their life cycle: archiving of registration metadata, filing and retention;
- facilitate transparency and exercise of the right of access to documents;
- enable the opening of the Historical Archives of the Commission to the public after 30 years.

Each Directorate-General or equivalent department therefore assumes responsibility for the retention of files relating to its sphere of responsibility, irrespective of the medium (electronic and/or paper).

## 1. Electronic and/or paper retention?

Documents that have been registered and filed must be available in electronic format: in born-digital or digitised format.

In a certain number of cases, retention of registered documents in their physical medium of origin remains mandatory:

- documents for which only the paper original has evidential value: documents required for control or audit purposes.
- documents partially digitised or not digitised and not attached to the Ares sheet:
  - classified documents
  - documents on media or in formats that cannot be digitised,
  - voluminous documents of which only the first page has been scanned
- documents that have not had the quality of their digitisation checked.

## 2. Filing and storing

A distinction is made between:

- **Filing**: an **intellectual** operation of assigning a filing code to documents = association of a document with one or more files.
- **Storing**: a **physical** operation of storing documents in a file, whether in paper form (storage in files and cabinets) or in IT form (storage on shared discs, in databases, on a web server, etc.).

## 3. Organisation of the unit shared drive

The unit common hard drive or shared hard drive is merely a working area in which a set of information in electronic format can be centrally stored and shared.

⇨ The fact of storing documents on the unit shared drive in no way affects the fundamental obligation to register the document.

For ease of use, the shared drive should be organised in accordance with a simplified filing plan, to ensure that information is organised in one way only.

# Filing and storage of documents

**Paper document**

**DIGITISATION**
**(if the original document is in paper format)**

**Electronic document**

**REGISTRATION**

**Metadata or description sheet**

**STORAGE: Physical organisation of documents to be retained in paper form.**
**Physical operation: physical location of the original document**

**FILING: Organisation of documents into files.**
**Intellectual operation: choice of file(s) for filing according to the content of the document**

**Correspondence between FILING PLAN and STORAGE PLAN:**

**It must always be possible to find original documents easily from the references of the electronic files**

**Supplementary official paper files organised according to the STORAGE PLAN adopted**

**Official electronic files filed according to the FILING PLAN headings**

# VI. CLOSURE AND RETENTION OF INTERMEDIATE RECORDS

## 1. A fundamental action: closing files

> Every official file must be closed. As soon as a file is created, it should already be clear what procedural act will be required to consider that the case is completed and to close the corresponding file.

The value of a file varies according to its age. There are two distinct phases in the use of a single file.

- **Current files** containing documents and/or information consulted daily or frequently. The physical responsibility for retention of the file lies with the Lead Department.
- **Closed files** that need to be retained for administrative or legal reasons.

Closure is a fundamental operation:

- Closure implies a verification of the file: certification by the Lead Department that the case has been correctly dealt with and that, as a result, the file is complete.
- A closed file can no longer be modified: no documents can be removed from it or new documents filed on it (apart from certain exceptions).
- The retention period determined by the **Common Retention List (CRL)** runs from the date of closure of the file.

### 1.1. DEADLINE FOR CLOSURE

The closure of a file must take place once all actions triggered by the case are completed and when no further document needs to be created or added to the file.

> **Recommendation**:
> In practice, a file should not be closed as soon as a case is completed, but only after a minimum period of six months to be sure that all relevant documents have been correctly processed.
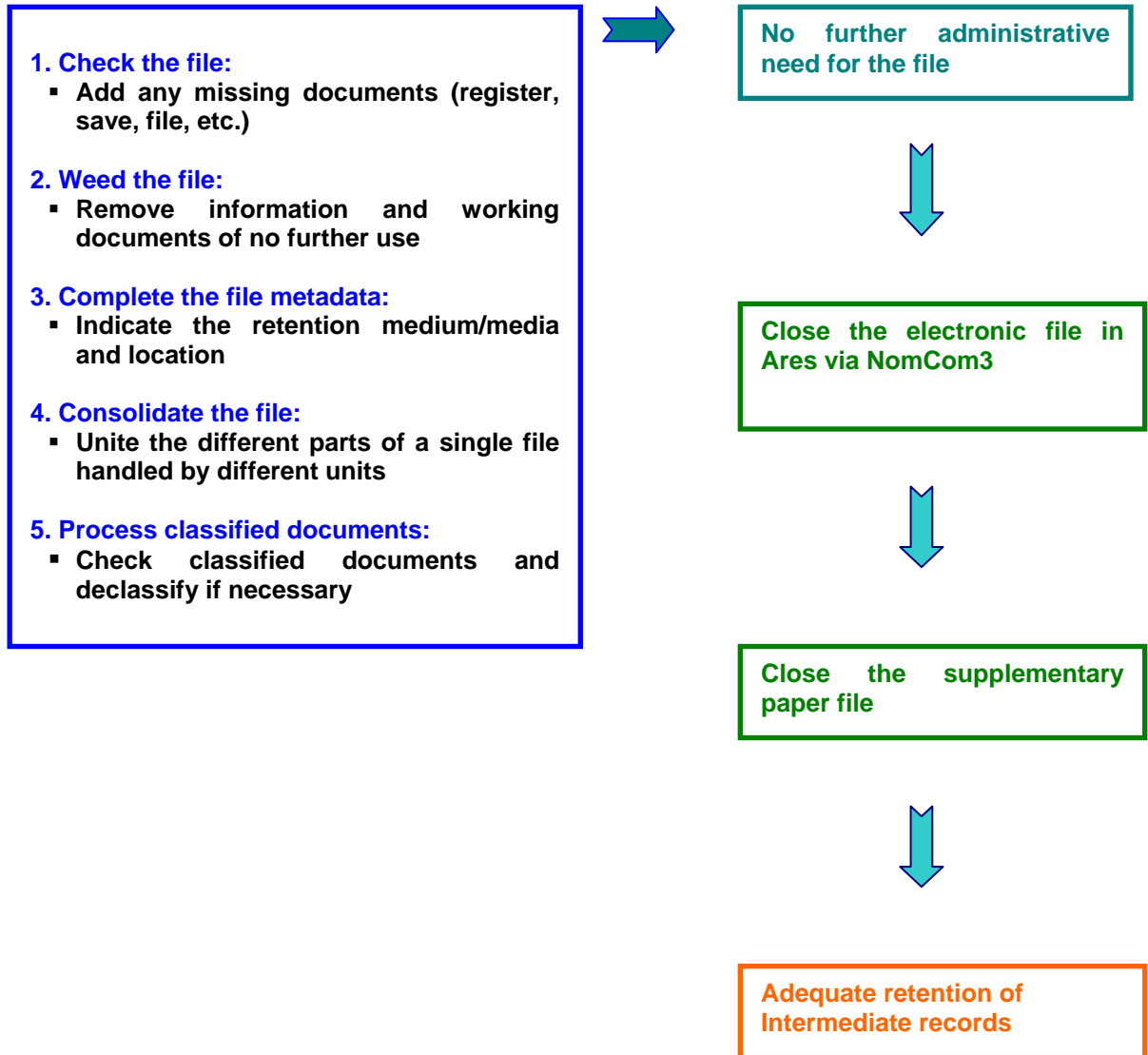> ⇨ Check the file list, at least on an annual basis, to close files corresponding to completed cases and organise their transfer to intermediate records.

### 1.2. RULES OF CLOSURE

A file must be checked before it is closed, since a file retained for the long term without any preliminary review or reorganisation can result in extended information search time.

This operation must be carried out by the Lead Department (chef de file). It is essential, in that it focuses on the content of the file and will not be repeated at a later date.

# Operations to be carried out in order to close a file

**1. Check the file:**
- Add any missing documents (register, save, file, etc.)

**2. Weed the file:**
- Remove information and working documents of no further use

**3. Complete the file metadata:**
- Indicate the retention medium/media and location

**4. Consolidate the file:**
- Unite the different parts of a single file handled by different units

**5. Process classified documents:**
- Check classified documents and declassify if necessary

No further administrative need for the file

Close the electronic file in Ares via NomCom3

Close the supplementary paper file

Adequate retention of Intermediate records

# 2. Retention procedures

> OBJECTIVES :
>
> Files created and held by the Commission must be subject to regular appraisal in order to:
> - eliminate records of no further value;
> - transfer to the Historical Archives Service only the types of files set out in the Common Retention List (CRL):
> - guarantee adequate retention in the Historical Archives of records of permanent value.

## 2.2. THE COMMON RETENTION LIST

The **Common Retention List (CRL)** was adopted and published by Secretariat-General in July 2007 (SEC(2007) 970). It is a regulatory instrument defining the period and conditions for retention of the Commission's official files.

The CRL:
- identifies the different types of file created and held by the DG/ Departments;
- determines the retention period for each type of file in the light of its administrative usefulness to departments, of legal obligations and of its potential historical value;
- determines the ARP (Administrative Retention Period) for each type of file, i.e. the number of years the file must be retained by the DG/Department. The retention period runs from the date of closure of the file;
- indicates the post-ARP action to be carried out by the DG/ Department at the end of the file's ARP: transfer to the Historical Archives, sampling/selection, elimination;
- determines the ultimate fate of files transferred to the Historical Archives: permanent retention or second review by the Historical Archives Service.

♦ **Structure of the CRL**

1) **File Types**: The types of files make it possible to identify files relating to the same type of actions, questions or procedures. They are divided into 12 main types subdivided into sub-types:
   - Institutional and governance questions
   - Strategy and coordination
   - Commission decision-making
   - EU financial system and the budget
   - Policy development
   - Implementation of policies and legislation
   - Programmes, projects and grants
   - International activities and enlargement
   - Transparency, information, communication and relations with citizens
   - Monitoring the application of Community law
   - Legal proceedings
   - Administration

2) **Description:** General description of file content: introductory comments on the kind of files concerned by each type of file.

3) **ARP** (Administrative Retention Period) = period (number of years) during which the DG/Department is required to retain a file in the light of its administrative usefulness, of any associated legal obligations and of its potential historical value.

   The ARP runs from the date of closure of file.

4) **Post-ARP Action or First Review** = action to be carried out by the DG on expiry of the ARP:
   - **THA**: Transfer to the Commission's Historical Archives Service.
   - **SAM/SEL** = Sampling and/or Selection
     - **Sampling:** Method of appraisal whereby, on the basis of objective criteria, a representative portion of files for retention is chosen from a body of files too large to be retained in its entirety.
     - **Selection**: Appraisal of a body of files for elimination in order to retain certain files on the basis of subjective criteria (importance, media impact).
   - **EL** = Elimination: physical destruction of files

5) **Action Following Transfer to the Historical Archives**:
   - **PP** = Permanent preservation
   - **2nd REVIEW**: A second appraisal, carried out by the Historical Archives Service, of the historical value of files to decide whether they should be permanently retained or eliminated.

6) **Lead Department for Preservation**: Indication of the DG or DGs using this type of file and responsible for their retention.

7) **Observations**: Elements to be taken into consideration by the DG as regards file retention.


## 2.2. THE ARCHIVE SCHEDULE

The archive schedule is an administrative document that governs the practical implementation of file retention in the DGs.

The schedule is drawn up by the DG DMO in collaboration with the Lead Departments, and sets out actions to be taken and responsibilities for the retention and elimination of official files in accordance with the Common Retention List.


The archive schedule must therefore give indications regarding:
- The location of files throughout their life cycle;
- The correspondence between the filing plan headings to which the files are attached and the CRL categories. The aim is that when a new file is created, its long-term retention attributes should be automatically assigned in accordance with the attachment heading in the filing plan.
- The retention medium and format (electronic and/or paper)
- The Lead Department (with information on any transfers of responsibility);
- The minimal file content
- Any rules for the elimination of documents;
- Factors that may give rise to the reopening of a closed file (OLAF investigation, case brought before the Court of Justice, complaints to the Ombudsman, etc.).