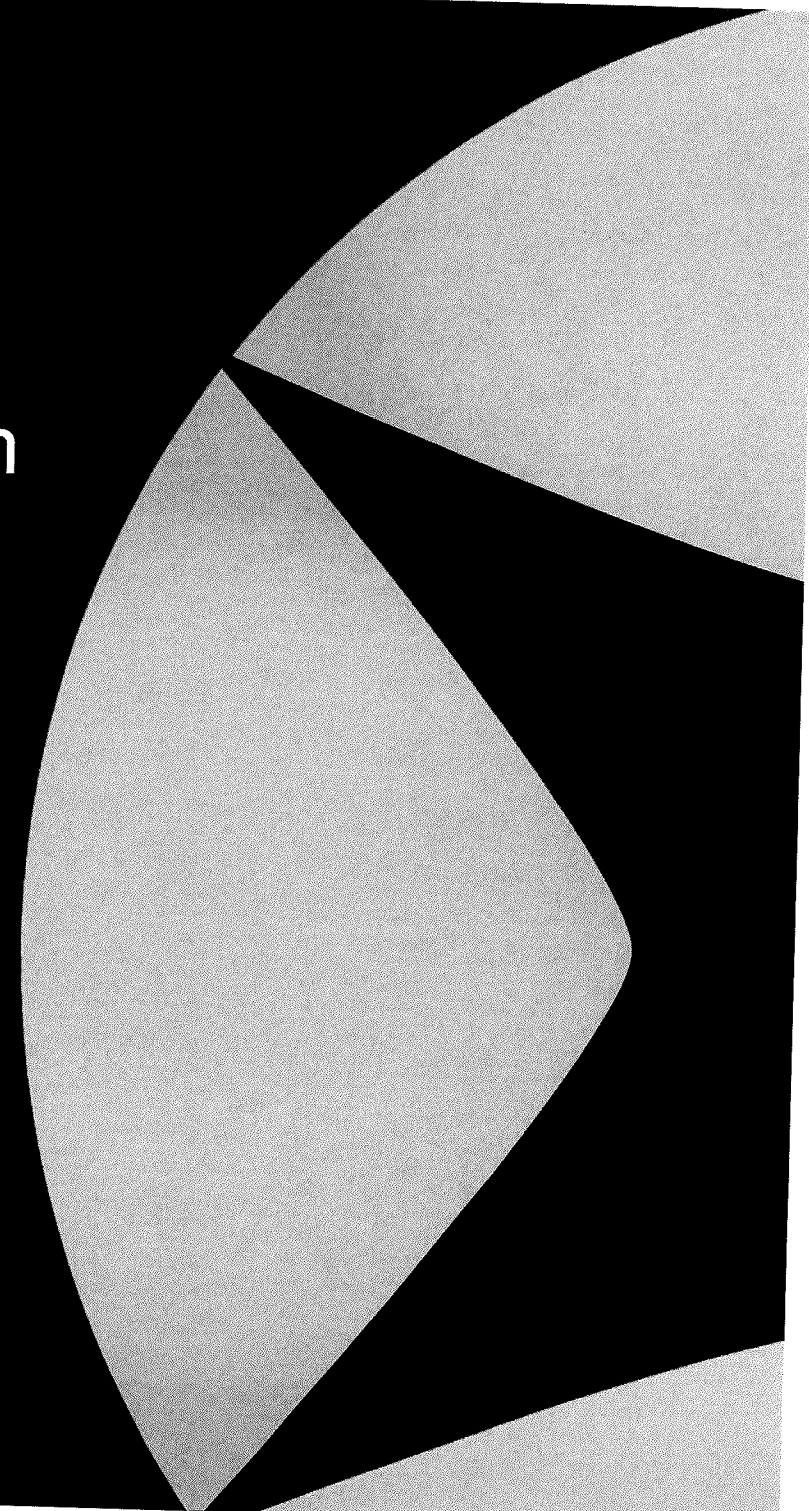# ECHA
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Information Management in practice

Lunch and learn
8 April 2022

European Chemicals Agency

In the next hour

- Basics of Information Management (10 mins)
- How Information Management is implemented in practice (20 mins)
- Questions and answers (interactive part – 20 mins)
- Feedback (5 mins)

Information Governance

- "Security, control, and optimization of information"

- "Control of information to meet legal, regulatory, risk and business demands"

- Robert F.Smallwood

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Information Management

- the focus of IM is the ability of organizations to capture, manage, preserve, store and deliver the right information to the right people at the right time.

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What is Records Management?

(short training video)

- MetaCompliance - MyCompliance Cloud

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Non Permanent VS Permanent records

According to **PRO-0010** "................documents that match the following conditions shall be qualified as records:

❑ They are considered final/approved versions,

❑ They document decisions taken by the Agency or provide evidence of the performance of ECHA's duties, required for audit or for the fulfilment of legal obligations,

❑ They are in whatever medium (audio-visual, paper, electronic, digital etc).

✓ Some of these records will be kept permanently (all final decisions, opinions, meeting minutes and supporting material concerning chemical substances including the most important record which is the dossier, MB Meetings, BoA cases) while other shall be destroyed. This is decided in **LIS-0026** the ECHA Retention Schedule
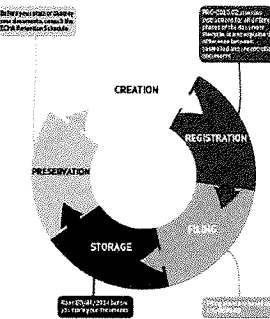
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How to get info on IG

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Documents Lifecycle/Registration

✓ All (incoming / outgoing) communications that require an action or follow-up, regardless of their medium (electronic, physical) and format (e-mails, letters, web-forms) need to be registered.

✓ IT systems which are accepted as registration systems are shown on the right side of the slide

✓ Incoming / Outgoing communications should be registered only once!

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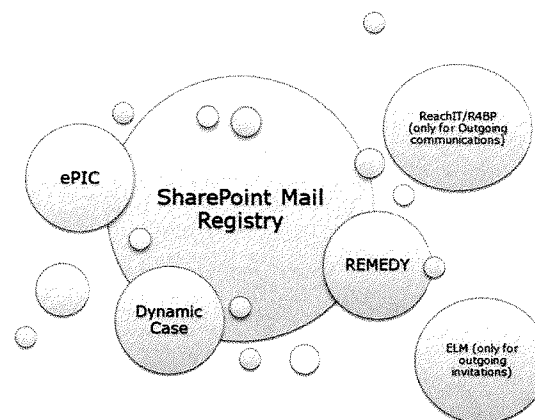
Documents Lifecycle/Registration

The following types of documents should **not** be registered:

- ✓ Internal communications exchanged daily
- ✓ Generic invitations which do not require a reply
- ✓ Advertisements,
- ✓ Declarations of interest, commitment & confidentiality
- ✓ "Thank you, letters", mass mailings and other mail for information with no relevance to ECHA's activities/processes (e.g. letters to suppliers asking for name or company change).

Documents Lifecycle/Filing

✓ LIS0009 *ECHA Activity and process structure* is used as the first 3 levels of the ECHA filing plan.The 4th level is the actual folders which contain the process related documents and records. LIS-0009 is used mainly in DyCA and SharePoint so as to provide a conceptional model of organising the documentation located in those 2 systems.

Code	Description	Ref	Priority	Regulation
12.03	Providing Executive Management	NE1	2 Critical (4h)	Any (will be treated at corporate level as CROSS REGULATION)
12.03				Providing corporate management secretariat
12.03				12.03.02 Providing corporate management secretariat
12.03				12.03.03 Coordinating and supporting the implementation of the quality policy
12.03				12.03.04 Coordinating and supporting the implementation of information security policies
12.03				12.03.05 Coordinating and supporting the implementation of information management policy including data requests
12.03				12.03.06 Coordinating and supporting the implementation of conflict of interest policy
12.03				12.03.07 Managing access to documents
12.03				12.03.08 Protecting personal data
12.03				12.03.10 Coordinating and supporting the implementation of environmental standards
12.04	Legal advice	NE2	2 Critical (4h)	Any
12.04				12.04.01 Litigation
12.04				12.04.02 Executive Director's review decisions
12.04				12.04.03 ECHA-wide legal support
12.04				12.04.04 Protection of intellectual property
12.05	Monitoring, improvement management and reportin	NE1	5 Necessary (3 weeks)	Any
12.05				12.05.01 Managing audits and assessments
12.05				12.05.03 Managing nonconformities and improvement actions
12.05				12.05.04 Performing Management Reviews
12.05				12.05.05 Corporate monitoring and reporting
12.15	UK withdrawal			CROSS REGULATION
13.01	Procurement	R1	2 Critical (4h)	CROSS REGULATION
13.01				13.01.01 Open and restricted procedures and specific contracts under multiple FWC
13.01				13.01.02 Exceptional procedures
13.01				13.01.03 Procedures below directive threshold
13.01				13.01.04 Specific contracts under single FWC
13.02	Contract Management	R1	3 Very important (2 days)	CROSS REGULATION

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Documents Lifecycle/Storage

✓ Check PRO-0010 *Control of documents and records Annex 1* for all IT systems available in ECHA for storing documents

No storing of originals in:

✓ Shared drives
✓ S-CIRCABC
✓ Interact
✓ FMBs / Personal Outlook accounts

Annex 1: Information management capabilities of ECHA's document management systems

Legend: x = no   √ = yes

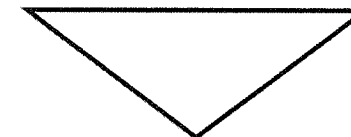| Document management systems	Filing in accordance with LIS-0009	Accepted storage location	Mail registration functionality	Approval workflow (replacing physical signature)
REACH-IT	x	√	√ (outgoing)	√
R4BP	x	√	√	√
ePIC	x	√	√ (outgoing)	N/A
HRMS	x	√	√ (incoming)	√
MiMA	x	√	N/A	√
Remedy	x	√	√	√
ABAC	x	√	√ (incoming)	√
Dynamic Case	√	√	√	√
Records Management (RM)	√	√	N/A	N/A
SharePoint (general)	√	√	x	x
Office 365 SharePoint	x	√	x	Only for documents in FIMSII
SP Mail Registry	x	√	√	x
SP ATD	x	√	√	x
SP EasySign	x	√	x	√
SP DoI Management Tool	x	√	N/A	√
Shared drives	x	x	x	x
Document management systems	**Filing in accordance with**	**Accepted storage**	**Mail registration**	**Approval workflow (replacing physical**

Documents Lifecycle/Preservation

✓ LIS-0026 decides how long we need to keep documents qualified as records

✓ In few words scientific records which are substance and/or dossier related should be kept permanently. The same counts for pre-ECHA archives handed over to ECHA from its predecessors

✓ ECHA doesn't have yet a consistent preservation strategy for its permanent records

Non-permanent

Average 5 years
(look at ECHA's Retention Schedule)
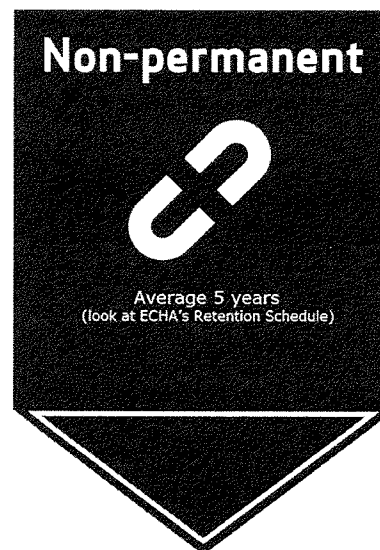
Destroy

Permanent

Archive

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Documents Lifecycle/Preservation

✓ Permanent paper records are kept in the archives located in K floor

✓ Electronic and digital permanent records are kept in the Records Management IT System. The DCRM (Dynamic Case Records Management) IT application started it's operation in 2014 aiming to store ECHA permanent (historical records) and the digitised pre-ECHA archives

✓ RM is integrated only with Dynamic Case from where records are published automatically
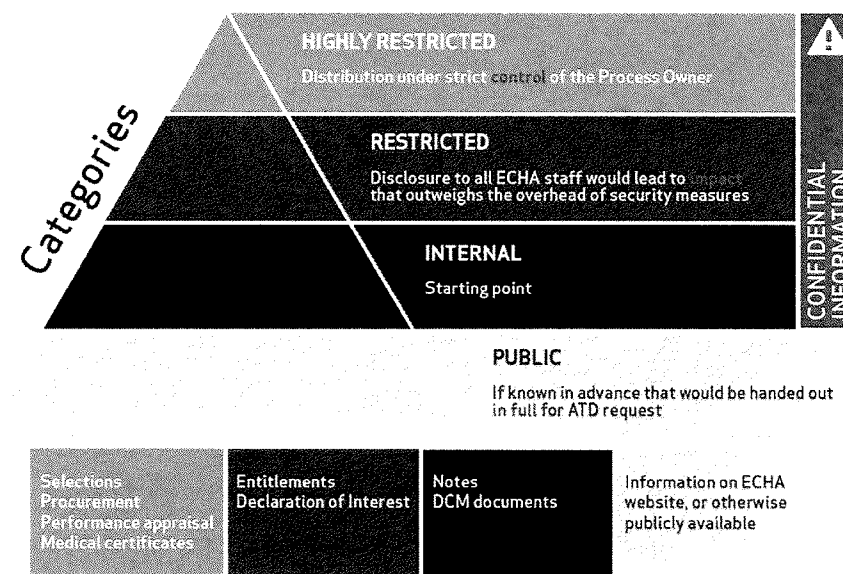
Permanent
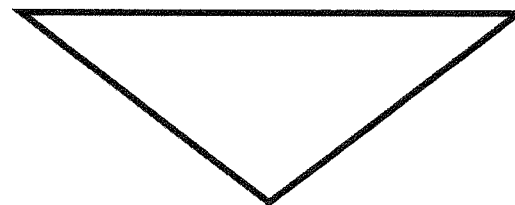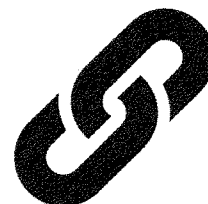
Archive

Documents Security

✓ Documents should have sensitivity labels when stored in document management systems (see picture on the right)

✓ These sensitivity labels decide the access rights to these documents (see more information on PRO-0085.04 *Access to ECHA Information*)

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MS Teams in ECHA: security

✓ Teams is cloud-based: no confidential information can be shared through it
✓ The only exception is the deliverables and technical documentation exchanged with IT contractors so as not to copy the documentation back to DMS
✓ Document Management System (DMS) for storing files
  • DMS sites and files can be **linked** in Teams
  • DO NOT **upload** files directly to Teams unless "Public" security classification

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Destruction

- ✓ 30% of ECHA paper files were destroyed in 2019 before moving to the new building in 2020
- ✓ Paper/electronic files which contain personal data <u>should</u> be destroyed according to *LIS-0026 ECHA Retention Schedule* and in line with the **General Data Protection Regulation** *((EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.*
- ✓ *The destruction of* files containing personal data is considered top priority!
- ✓ No coordinated destruction has been done so far for electronic files

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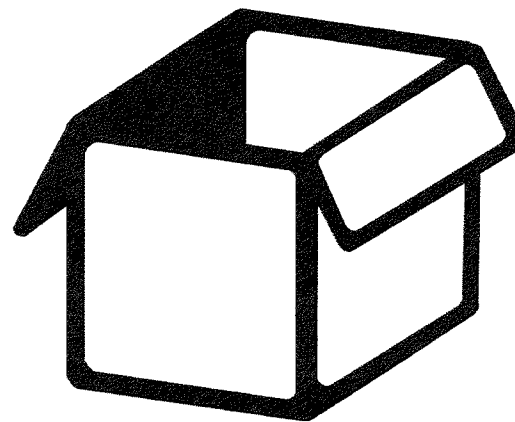EUROPEAN CHEMICALS AGENCY
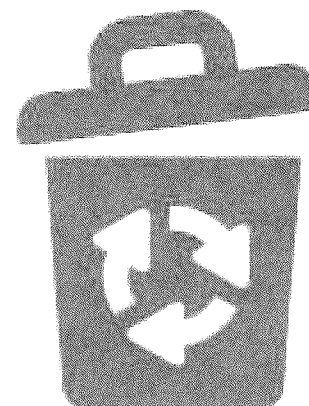
Destruction

Why destroy electronic files?

✓ Storage is not unlimited everywhere. If we don't delete content, we will be forced to buy more user licences or buy additional storage space.

✓ Files containing personal data should be destroyed and not kept permanently according to the GDPR (*General Data Protection Regulation*)

✓ Keeping confidential data for more than needed raise the content exposure risk

✓ Excess documents make search less efficient and any e-discovery activity more time consuming

✓ Long term preservation of documents requires different handling methods like conversion or migrations which consequently will raise their retention costs

Pre-ECHA archives

ECHA is committed to ensure transparency in the evolution of its scientific work by facilitating access to documents, and the physical archives ECHA inherited from previous legislations are part of this commitment. Our collections consist of the following types of archives:

- ✓ Biocides archives
- ✓ Notification of New Substances (NONS) archives
- ✓ Classification and labelling (C&L) archives
- ✓ No-longer polymers (NLP) archive
- ✓ European Inventory of Existing Commercial Chemical Substances on the market (EINECS) submission archives
- ✓ Meeting documents of TSM and TCNES (Technical Committee on New and Existing Substances)

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Pre-ECHA archives

- ✓ Pre-ECHA archives were handed over to ECHA by JRC and the European Chemical Bureau back in 2013
- ✓ In what concerns the retention of the pre-ECHA archives, it has been agreed that they should be kept permanently, unless otherwise specified. They do not fall under ECHA`s retention schedule and are treated as a separate entity.
- ✓ Since November 2018 a project concerning the digitalisation of the pre-ECHA archives is up and running. All collections listed in previous slide has been digitised and migrated to RM IT system except the Biocides collections (3 in total) which are still to be migrated to RM.
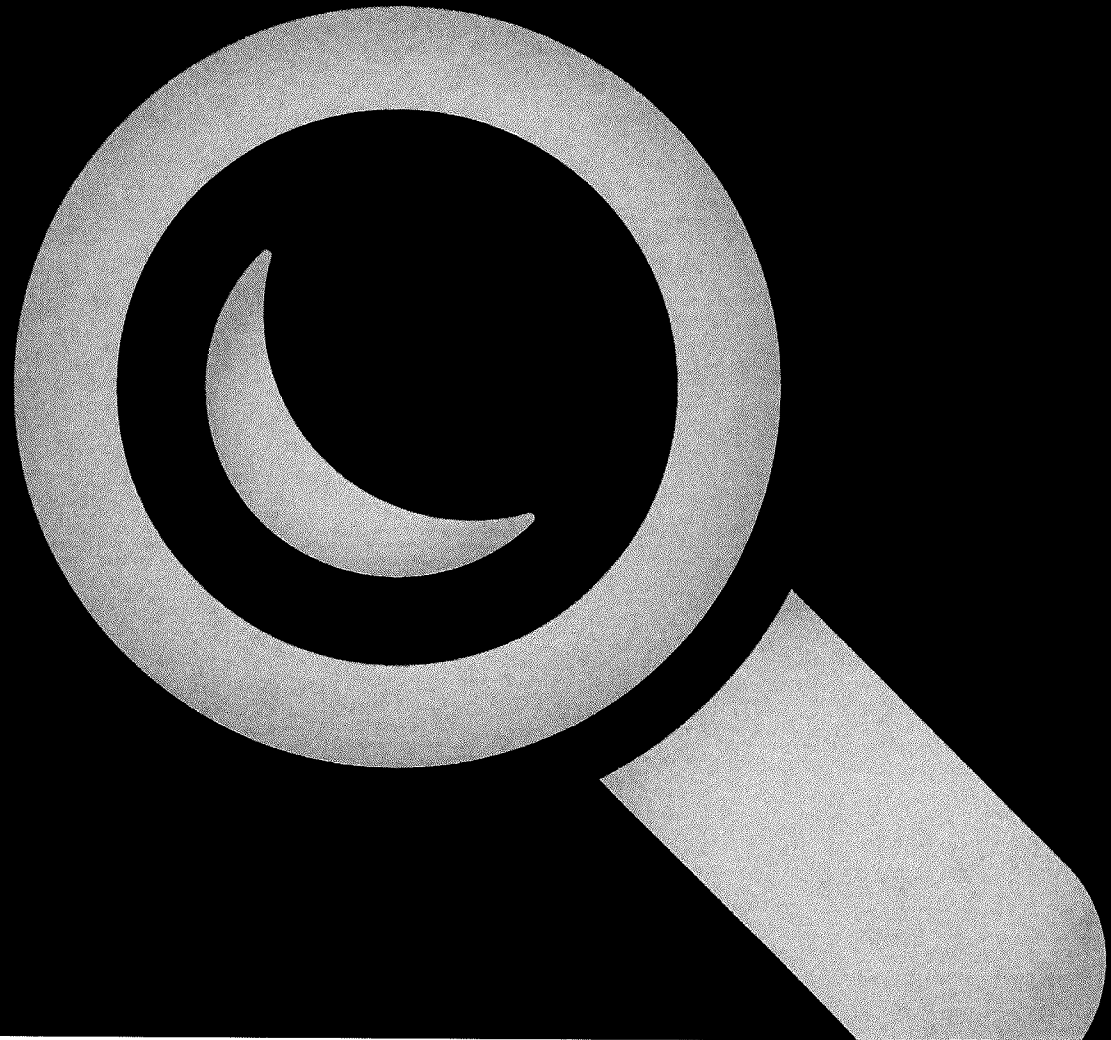
Contacts

Data Protection	███████████
Information Security	███████████
Records, DCRM, Storage, Policies	█████████████
Archives, access to basement	█████████████
Registration of documents (SP Mail Registry, Remedy)	█████████████
IT Business Continuity	█████████

Feedback

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Thank you!