

Document Management Specialist POL-DMO/40	 <b>eiopa</b> EUROPEAN INSURANCE AND OCCUPATIONAL PENSIONS AUTHORITY	Version 3.0 DATE 23/07/2019
<b>Policy on Document Management</b>		

## POL

### Document Management Policy

#### Document History

Status	Date	Update
<b>Original</b>	20/03/2015	Endorsed policy
<b>First review</b>	22/09/2016	Editorial changes and updated legislative references
<b>Version 2.0</b>	28/04/2017	Updated policy to incorporate feedback and comments
<b>Third review</b>	17/04/2019	Updated policy to reflect changes since ERIS implementation
<b>Version 3.0</b>	23/07/2019	Endorsed policy version 3.0

#### Document Sign-Off<sup>1</sup>

Initiation	Approval	DPO Check	Legal Check	Approval of Executive Director
Document Management Specialist	Head of Corporate Support Department	Data Protection Officer	Head of Corporate Affairs Department	Executive Director
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Date	[Redacted]	Date	Date	Date
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<sup>1</sup> Delegations may apply.

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## 1. Definitions

For the purposes of this policy the following definitions shall apply:

<b>Archives</b>	Documents and records, regardless of form or medium, that are selected for long-term or permanent preservation due to their continuing historical or administrative value.
<b>Archiving</b>	Group of operations and processes needed to store and preserve documents with historical or research value for a long period of time, ensuring their integrity, authenticity, reliability and accessibility.
<b>Authoritative document</b>	The master version of a document which bears the characteristics of integrity and authenticity, and is preserved for its evidential or historical value. As distinct from copies or facsimiles. For electronic documents, the authoritative version is the one captured in the organisation's official filing system (in EIOPA's case, ERIS).
<b>Born-digital documents</b>	Documents created and retained in digital format. As distinct from documents converted from analogue to digital format, by being scanned or otherwise digitised.
<b>Business Classification Scheme (BCS)</b>	Hierarchical and logical structure made up of a given number of interlinked headings at several levels, which allows for the intellectual organisation of EIOPA's files on the basis of its activities. Sometimes referred to as a <i>Filing Plan</i> .
<b>Capture</b>	Refers to the entry and integration of a document into an agreed document management system, which will appropriately manage documents and support their use over time.
<b>Classification</b>	Operation involving identifying documents and ordering them in categories following the logical organisation, principles, methods and rules of a filing system. Not to be confused with the term "classification" in the sense of assigning a security level.
<b>Disposal</b>	Action taken on expiry of a document's retention period; either destruction, review, or further preservation, as defined by a retention schedule.
<b>Document</b>	Recorded information, in whatever medium, which can be treated as a unit and is received by or created within EIOPA's systems.
<b>Document Management System</b>	An electronic or physical information system which captures, stores, protects, preserves and provides access to documents according to corporate policies and requirements. EIOPA's primary document management system is ERIS.
<b>ERIS Power User</b>	An EIOPA staff member nominated by their line manager as an advanced user of ERIS. The role involves promoting usage of ERIS, supporting the implementation of document management policies and standards, and helping to achieve consistency in the way the system is used across the organisation.
<b>File</b>	A logical accumulation of documents related to the same time-limited case, event, project or other activity. Not to be confused with the term "file" that is used in IT systems to describe an individual document.
<b>Filing Plan</b>	See <i>Business Classification Scheme (BCS)</i>

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<b>Metadata</b>	Data element(s), often in a standardised form, which are used to describe a document. Such data supports the retrieval, management and authentication of documents over time.
<b>Personal Data</b>	Any information relating to an identified or identifiable person ('data subject') who can be identified, directly or indirectly, by reference to one or more specific factors (physical, physiological, mental, economic, cultural, social).
<b>Record</b>	A finalised document, which is maintained as evidence in pursuance of legal obligations or in the transaction of business. A record should be authentic, reliable and trustworthy. Once a document has been finalised as a record, it cannot be modified.
<b>Registration</b>	The act of recording brief descriptive information (metadata) about a document in a registration system, and assigning it a unique identifier (registration number). Registration may be a manual process, or automated on capture into an electronic system.
<b>Retention period</b>	The period of time for which a document needs to be kept based on its administrative usefulness and the statutory and legal obligations linked to it. When the retention period expires a document needs to be disposed of. (see also <i>disposal, retention schedule</i> )
<b>Retention Schedule</b>	A tool that identifies and describes EIOPA's documents, and provides instructions for their maintenance and disposal. The schedule ensures that documents are retained for as long as necessary based on their administrative, fiscal, legal and historical value.
<b>Retrieval</b>	The process of locating documents in storage and returning them to use. Includes the matching of electronic documents against user queries, based on metadata or full-text searches.

## 2. Policy Statement and Purpose

- 2.1 EIOPA is committed to creating, keeping and managing documents which relate to the activities falling within its competence and in the framework of its official tasks. This policy aims to formalise this commitment.
- 2.2 The policy shall be supported by the setup of the necessary organisational and physical structure, supporting procedures and training to enable the efficient and appropriate implementation of these provisions.
- 2.3 All documents created or received by EIOPA in the course of its core business or administrative activities ('EIOPA documents') shall be covered by the provisions of this policy. The policy does not cover personal, non-business-related documents, which should neither be saved in EIOPA's document management system(s), nor should they be archived.
- 2.4 The principles of this policy apply to all EIOPA temporary and contract agents, as well as SNEs, interim agents, contractors and trainees, who have access to EIOPA documents, wherever these are and whatever format they are in.

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### 3. Description

#### General provisions

- 3.1 Documents should be regarded as a key corporate asset, and fundamental to the efficient and effective accomplishment of EIOPA's tasks. As such, documents must be created, stored, managed, protected and used in a manner commensurate with their legal, regulatory, operational or historical value.
- 3.2 EIOPA's document management framework shall encourage the creation of good-quality, complete and accurate records of business activities and decisions. Sound recordkeeping practices shall support EIOPA's accountability and commitment to good administrative behaviour<sup>2</sup>.
- 3.3 To protect the integrity of their context, documents relating to EIOPA's official business should always be kept separate from personal documents. Annex 1 defines the locations in which personal and business-related documents may be stored.

#### Capture and finalisation of documents<sup>3</sup>

- 3.4 Documents created or received in the course of EIOPA business, whether electronically or physically, must be captured in designated document management system(s) so that they can be accessed for reasons of business need, continuity and accountability.
- 3.5 ERIS (EIOPA Records & Information System) is the main document management system at EIOPA and must be used to hold all EIOPA documents<sup>4</sup>, including drafts that need to be retained for more than a very short period of time.
- 3.6 Documents captured in ERIS are deemed to have been registered in accordance with ISO 15489<sup>5</sup>.
- 3.7 Following the implementing rules for Decision 2002/47/EC, ECSC, EURATOM on document management, documents that are formally-drawn up<sup>6</sup>, important and not short-lived, shall be captured and finalised in the approved document management system(s) and therefore certified as "EIOPA records". This can be achieved in ERIS by using the available "finalise" functionality, and in accordance with the Working Instructions on Document Finalisation (WOI/DMS/49).
- 3.8 Records must be maintained in a way that guarantees their reliability and usability as evidence of EIOPA activities over time. The ERIS "finalise" function achieves this by

<sup>2</sup> Decision of the Management Board on EIOPA Code of Good Administrative Behaviour (EIOPA-MB-11/043).

<sup>3</sup> Working Instructions on Document Finalisation (WOI/DMS/49).

<sup>4</sup> Unless technical limitations (file type/size) prevent capture in ERIS.

<sup>5</sup> The international standard on records management.

<sup>6</sup> A document is considered formally drawn up when it has been approved as ready by the author and is ready for transmission. A document in general is approved as ready either by an act of approval (for example a signature), or by de facto treating the document as ready (for example by sending it to the intended recipient(s), by making it accessible via a website, etc.). An e-mail is approved as ready when the author decides to send it to the intended recipient(s).

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freezing the contents of the document and protecting it from any further alteration or modifications.

3.9 The categories of documents that should be captured and finalised in ERIS include, but are not limited to:

- Correspondence of a fully official character, both incoming and outgoing;
- Documents approved by EIOPA's decision-making bodies, EIOPA's Chair and Executive Director;
- Contracts, agreements, and memoranda of understanding (MOUs);
- Internal governance documents, which establish corporate principles and rules.

3.10 In addition to the above, specific procedures on capture and finalisation may be implemented at department/unit/team level, or for certain document types, if such procedures are deemed useful or necessary for their management and retrieval.

### **Filing and retrieval of documents<sup>7</sup>**

3.11 The aim of *filing* is to interpret and use documents in the context in which they were created, to facilitate targeted searching, to improve the quality and continuity of administration<sup>8</sup>, and to simplify the application of retention and disposal actions. In order to achieve these benefits, all EIOPA documents shall be kept in *files* (time-limited aggregations).

3.12 A corporate Business Classification Scheme (BCS) has been drawn up and shall be used as a tool for logically organising and managing files in the agreed document management system(s), most particularly ERIS.

3.13 In order to ensure consistency, the BCS shall be centrally owned and managed by the Document Management Specialist and reviewed annually, in collaboration with the relevant teams. Proposals for modifications would need to be justified<sup>9</sup>.

3.14 Any future changes to the BCS are not retroactive and shall apply from the date such changes come into effect.

3.15 Document Naming Conventions and a Metadata Policy shall be developed to complement the BCS and further support the identification and retrieval of documents.

3.16 Additional means of improving the retrieval of documents may be developed at corporate or unit/team level, with the advisory support of the Document Management Specialist.

### **Use and sharing of documents**

3.17 Documents created or received by EIOPA shall demonstrate at any time that they are reliable, contextual and trustworthy. For this reason, documents that fall within the scope

<sup>7</sup> Working Instructions on Classification and Retention (WOI/DMS/50).

<sup>8</sup> The definition is taken from the Implementing Rules for the Decision 2002/47/EC.

<sup>9</sup> Proposals for modification of the BCS should be sent in writing to the DMS by the relevant HoD along with a justification explaining the need for the change. The corporate impact shall be assessed in consultation with other units, if deemed necessary. Efforts shall be made to coordinate the implementation of approved changes.

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of this policy shall be used and shared via auditable means, which allow any alterations – as well as the authors and participants – to be identified<sup>10</sup>.

- 3.18 Efforts shall be made for each document to be accessible and developed in a defined location. An acceptable level of duplication can, however, be justified, especially when the effort of access rights management exceeds the expected benefit.
- 3.19 The distribution of attachments via email should be minimised as much as possible; links to documents should always be preferred.
- 3.20 Access management procedures for sharing documents shall be put in place with the aim of maximising efficiency and transparency, supporting compliance with the Access to Documents Regulation<sup>11</sup>, but without taking any compromises with respect to confidentiality and protection of sensitive information<sup>12</sup>. EIOPA's document management system(s) shall, wherever possible, define default access permissions for individual users and groups, which may be overridden when justified.

### **Retention and archiving of documents<sup>13</sup>**

- 3.21 Documents shall be retained as long as they are needed to serve the operational, legal and financial requirements of EIOPA. On expiry of this retention period, documents shall be reviewed and disposed of (eliminated or archived) through a formal procedure.
- 3.22 Retention periods and subsequent disposal actions are defined in the EIOPA Retention Schedule. This tool shall avoid the premature destruction of documents that may still have value to EIOPA or its stakeholders.
- 3.23 No later than 15 years after the date of creation, documents to be preserved ('EIOPA archives') shall be separated from those with no administrative or historical value, according to an internal sorting process<sup>14</sup>.
- 3.24 Paper archives shall be kept no longer than 30 years within EIOPA's premises, after which they shall be deposited at the Historical Archives of the European Union (EUI) in Florence and made available to the public, unless exceptions still apply<sup>15</sup>.
- 3.25 In the case of digital archives, EIOPA shall provide permanent access to the EUI after 30 years, to allow such archives to be made accessible to the public from a single location and to promote their consultation. To this end, EIOPA shall develop appropriate preservation strategies to ensure the survival of its born-digital documents.

<sup>10</sup> In line with Article 7, Annex, Decision 2004/563, OJ EU L 251, 27 July 2004, p. 9.

<sup>11</sup> Regulation (EC) No 1049/2001.

<sup>12</sup> See, in particular, the Rules on Handling EIOPA Information and Documents (WOI/LSO/36).

<sup>13</sup> Working Instructions on Classification and Retention (WOI/DMS/50).

<sup>14</sup> Article 7 of Council Regulation (EEC, EURATOM) No 354/83 (as amended), OJ L 43, 15.2.1983, p.5.

<sup>15</sup> Exceptions include: documents containing personal employee-related data (Personal Files and Medical Files), and sensitive documents that cannot be declassified after 25 years. In the latter case, such documents shall be re-examined periodically (at least every five years) to decide whether or not to declassify them. See Article 5 of Council Regulation (EEC, Euratom) No 354/83 (as amended), OJ L 43, 15.2.1983, p.4.

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## Auditing and monitoring compliance

- 3.26 The Document Management Specialist shall conduct regular monitoring of compliance of this policy with the support of the Heads of Department, Heads of Unit, Team Leaders, and ERIS Power Users. Document management ad-hoc audits may be carried out by the Document Management Specialist in areas of risk or priority, when deemed necessary by management.
- 3.27 This policy will be reviewed annually, taking into account any changes in the needs of EIOPA on document management, changes in legislation and the implementing rules issued by the European Commission, and the development of new information and communication technologies.

## 4. Personal Data Protection

- 4.1 With regards to documents containing personal data, EIOPA shall respect the privacy and data protection rights of those whose personal data it is entrusted with. Regarding the use and sharing of documents containing personal data, EIOPA shall apply Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018.
- 4.2 Documents containing personal data shall be kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which the data were collected, or for which they are further processed (see 5.3 below).
- 4.3 Personal data which are to be further processed (including storage for longer periods) shall be subject to the appropriate safeguards:
- If further processed for historical research or archiving purposes in the public interest: only documents that meet the selection criteria for permanent preservation (i.e. have archival/research value) shall be retained. Additionally, access to archival documents that contain personal data (including online access) shall be appropriately controlled. Pseudonymised copies shall be provided to researchers, if research purposes can be fulfilled in that manner;
  - If further processed for statistical or scientific use: personal data shall be kept either in anonymous form only or, if that is not possible, with the identity of the individual encrypted.

In any event, personal data shall not be further processed except for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes.

## 5. Roles and Responsibilities

- 5.1 It is the responsibility of **all the persons mentioned in point 2.4** to manage EIOPA documents according to the provisions of this policy. In addition to EIOPA temporary and contract agents, SNEs and to some extent contractors are subject to the obligation of integrity and discretion<sup>16</sup>; this includes protecting information in their custody from unauthorised access and improper use.

<sup>16</sup> See Staff Regulations of Officials to the European Communities, Title II, i.e. art 17 to 19: staff members may not purposefully disclose confidential or sensitive information within or outside the authority, except to individuals known to be authorised to receive such information.

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- 5.2 The **Document Management Specialist (DMS)** is the owner of the present document, having the responsibility for developing, implementing, monitoring and reviewing document management principles and requirements. Furthermore, the DMS promotes document management awareness within EIOPA, and acts as the main point of contact on document management issues.
- 5.3 **Heads of Department** and **Heads of Unit** bear the responsibility for the proper implementation of the document management policy. They may assign ERIS Power User roles in their area(s) of responsibility to ensure the necessary support in this regard.
- 5.4 **ERIS Power Users** support the implementation of document management rules and procedures at department, unit or team level; they are the first point of contact for issues related to capture, filing and archiving of documents in their area of responsibility. They promote policy implementation and provide input and feedback to the Document Management Specialist, to identify training needs and areas for priority action.
- 5.5 The **Legal** team has an advisory role in supporting staff to define confidentiality and in coordinating access to document requests filed under Regulation 1049/2001.
- 5.6 The **Data Protection Officer (DPO)** has an advisory role in matters related to the protection of personal data.
- 5.7 The **Local Security Officer (LSO)** has an advisory role with regard to the implementation of the security policy, which also covers the handling of documents that contain sensitive information.
- 5.8 The **IT Unit** shall support achieving compliance with this policy across EIOPA for electronic documents that are captured and stored in EIOPA's business systems (ERIS, Extranet, and others).
- 5.9 The **Corporate Services Team** shall support achieving compliance with this policy across EIOPA for physical documents that are stored in EIOPA's premises, including central archive storage areas.

## 6. References

### Legal and Regulatory Framework and International Standards

- Commission Decision 2002/47/EC, ECSC, Euratom - Provisions on document management
- Commission Decision 2004/563/EC, Euratom - Provisions on electronic and digitised documents)
- Council Regulation (EEC, EURATOM) No 354/83 (as amended by Council Regulation (EC, Euratom) No 1700/2003 and Council Regulation (EU) 2015/496) on the opening to the public of the historical archives of the European Economic Community and the European Atomic Energy Community
- Regulation (EC) No 1049/2001 of the European Parliament and of the Council regarding public access to European Parliament, Council and Commission documents
- Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free



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movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC

- ISO 15489-1:2016, Information and Documentation--Records Management

### **Related EIOPA Decisions, Policies and Internal Procedures**

- EIOPA-MB-11/050 Decision of the Management Board on implementing rules relating to Regulation (EC) No 45/2001 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data by the community institutions and bodies and on the free movement of such data (as amended)
- EIOPA-MB-11/051 Decision of the Management Board concerning public access to documents
- EIOPA-MB-11/043 Decision of the Management Board on EIOPA Code of Good Administrative Behaviour
- EIOPA-MB-14/034 Decision of the Management Board on Protection of Information Systems and Information
- EIOPA Security Policy (POL/LSO/35)
- EIOPA Policy on Physical Document Storage (POL/DMS/47)
- Working Instructions on Document Classification and Retention (WOI/DMS/50)
- Working Instructions on Document Finalisation (WOI/DMS/49)
- Working Instructions on Document Naming Conventions (WOI/DMS/45)
- Working Instructions on the ERIS Power Users Network (WOI/DMS/46)
- Rules on Handling EIOPA Information and Documents (WOI/LSO/36)

## **7. Entry Into Force**

This Policy shall enter into force on 19 August 2019.

Done at Frankfurt am Main, on 19 August 2019

  
 Executive Director

## Annex 1 – Document management domains

Domain	Applicable locations	Documents belonging in this domain
<b>Personal domain</b>	<i>Desktop, H:Drive, cupboards and desk drawers assigned to individual staff members, Outlook inboxes of individual staff members</i>	<ul style="list-style-type: none"> <li>• Non-business documents with no relation to EIOPA</li> <li>• Personal copies of HR documents</li> <li>• Personal notes and reminders</li> <li>• Convenience copies of business-related documents</li> </ul>
<b>Corporate domain</b>	<i>Approved corporate document management system(s)<sup>17</sup>, shared cupboards and filing cabinets, designated document storage rooms, shared Outlook mailboxes, Intranet</i>	<ul style="list-style-type: none"> <li>• All authoritative business-related documents (both draft and final versions)</li> <li>• EIOPA archives (less than 30 years old)</li> </ul>
<b>External domain</b>	<i>Extranet sites</i>	<ul style="list-style-type: none"> <li>• Documents to be shared with authorised external parties, e.g. members of EIOPA’s decision-making bodies (BoS/MB), Committees and other fora</li> </ul>
<b>Public domain</b>	<i>EIOPA public website and social media channels, Historical Archives of the European Union (EUI)</i>	<ul style="list-style-type: none"> <li>• Documents intended for widespread public consumption (publications)</li> <li>• Documents released as a result of a successful Access to Document (ATD) request under Regulation 1049/2001</li> <li>• EIOPA archives, which have been declassified and made available to the public after 30 years</li> </ul>

<sup>17</sup> Especially EIOPA’s primary document management system, ERIS.