


Document Management Specialist		Version 1.0
POL-DMS/47		DATE 28/04/2017
Policy on Physical Document Storage		

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Document History

Status	Date	Update
Original	16/08/2016	Initial version
Update	28/04/2017	Updated policy to incorporate feedback and comments

Document Sign-Off¹

Initiation	Approval	Legal Check	Endorsement
Initiator	Head of Department	Legal Team Leader	Executive Director
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Date	[REDACTED]	Date	Date
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]


¹ Delegations may apply.

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1. Definitions

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

Archival material	Authoritative documents that have been selected for permanent or long-term preservation (15 years+) according to EIOPA retention schedules.
Authoritative document	The master version of a document which bears the characteristics of integrity and authenticity, and is preserved for its evidential or historical value, e.g. a document containing an original physical signature. As distinct from copies or facsimiles.
Born-digital documents	Documents created and retained in digital format. As distinct from documents converted from analogue to digital format, by being scanned or otherwise digitised.
Carrier	The base and medium on which information is recorded, which allows it to be transported over distance or time. For printed information, this is the paper and the ink. For digital information, the carrier could be a magnetic disk (e.g. a hard drive), an optical disc (CD/DVD), a tape, a USB stick etc.
Copy	A reproduction or duplicate of an authoritative document.
Disposition	Final action taken at the end of a document's retention period; either destruction or transfer to an archives.
Document	Recorded information, in whatever format or medium (written on paper or stored in electronic form or as a sound, visual or audiovisual recording), which can be treated as a unit and is received by or created within EIOPA's systems.
File	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.
Non-archival material	Authoritative documents requiring only short- to medium-term retention (less than 15 years) according to EIOPA's Filing Plan.
Physical document	A document held on a tangible, physical medium (including paper, CD, microfilm, USB stick).
Relative humidity (RH)	The ratio, defined as a percentage, of the existing partial vapour pressure of water to the vapour pressure at saturation.
Retention period	The period of time for which a document should be kept, based on its operational, legal and/or historical value.
Vital records	Documents that would allow EIOPA to continue functioning in the event of a disaster. These may include documents with significant operational, legal or evidential value.

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2. Policy Statement and Purpose

- 2.1 As an EU agency, EIOPA is required to establish historical archives and make them accessible to the public after 30 years¹. The Authority is therefore obliged to preserve documents with historical value (including those in physical form) for a long, if not indefinite, period of time. The continued survival of such documents – which establish EIOPA's institutional memory – cannot be left to chance.
- 2.2 Non-archival documents must also be stored appropriately to support accountability, business efficiency and information security requirements².
- 2.3 This policy sets out the minimum standards to which EIOPA's arrangements for physical document storage should comply. These standards should be used to inform the planning and implementation of document storage throughout EIOPA's premises.
- 2.4 This policy supports EIOPA's commitment to information governance, including the protection of personal data and compliance with Internal Control Standard n°11 on document management³.
- 2.5 This policy applies to all documents held on physical media within EIOPA's premises. This includes paper-based documents, photographic prints, posters, microfilm, slides or negatives; as well as documents stored on optical disc carriers (CDs/DVDs) or USB sticks. It does not apply to born-digital or digitised documents held on storage or back-up servers, which shall be covered by a separate policy on digital preservation.
- 2.6 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 physical documents on EIOPA's premises.

3. Description

General provisions


- 3.1 Storage arrangements must ensure that physical documents remain secure, intact, accessible and intelligible for as long as they may be needed.
- 3.2 Storage should not be confused with filing, which is the logical grouping of documents according to the activity or topic they relate to.
- 3.3 Except when in active use⁴, documents should be stored in areas dedicated for such a purpose; rooms should not be shared with the storage of other equipment or materials.
- 3.4 The requirements for storage may differ between different types of document, according to their storage medium, retention period or sensitivity of content. Where

¹ [Council Regulation \(EC, EURATOM\) No 354/83 \(as amended – consolidated version\)](#) on the opening to the public of the historical archives of the European Economic Community and the European Atomic Energy Community.

² Rules on Handling EIOPA Information and Documents (WOI/LSO/36).

³ ICS11 recommends that documents should be 'adequately protected against destruction, theft, fire, etc.': <https://myintracomm.ec.testa.eu/budgweb/EN/man/icrm/ics/Pages/ics11.aspx>

⁴ Active use = requiring regular consultation and/or relating to ongoing activities or projects.

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practical, this policy makes the distinction between such requirements, particularly in the case of archival and non-archival material.

- 3.5 For archival material, appropriate storage conditions should be attained as early as possible in the document lifecycle, to mitigate deterioration, loss or damage.
- 3.6 Copies do not generally require the same level of protection as authoritative documents, as they are easily replaceable⁵. However, copies must still be stored securely according to EIOPA's confidentiality regime⁶, based upon the sensitivity of the information they contain.

Choice of storage location


- 3.7 Storage space should be assigned efficiently and appropriately. For the purposes of this policy, storage areas shall be categorised as follows:
- "Decentralised storage" – Cupboards, filing cabinets and desk drawers assigned to individual staff members;
 - "Intermediate storage" – Shared cupboards and filing cabinets; as well as dedicated storage rooms on each office floor; and
 - "Centralised storage" – Archive storage room(s) in the basement.
- 3.8 As Decentralised areas cannot be easily controlled, authoritative documents should be transferred to Intermediate or Centralised storage as soon as possible.
- 3.9 Under no circumstances should personal documents and authoritative business documents be stored together.
- 3.10 Staff members should also exercise proper judgment when storing authoritative business documents in areas inaccessible to others (for instance, lockable desk drawers). Such practices can create unnecessary information silos, as well as business continuity problems in the case of unexpected absences. Instead, such documents must be stored in a shared cupboard or dedicated storage room that can be accessed by other authorised personnel if and when needed.

Environmental conditions

- 3.11 Documents should never be stored in areas with a high moisture content or susceptibility to water infiltration.
- 3.12 The recommended target temperature and humidity for dedicated document storage rooms are: **18°C** and **RH 40-50%**. Where such conditions cannot be obtained, the use of dehumidifying or air-conditioning units should be considered.
- 3.13 Environmental conditions in document storage rooms should be maintained at as stable a level as possible. While some seasonal fluctuations may be unavoidable, temperature

⁵ Rules on the retention periods for document copies shall be defined in a Retention and Archiving Policy.

⁶ EIOPA Policy on Security Levels (POL/LSO/23).

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and relative humidity (RH) levels should not be allowed to deviate from the ranges: 13-20°C and RH 40-50%.


- 3.14 The temperature and relative humidity of EIOPA's centralised document storage area(s) should be monitored on a monthly basis. Any dangerous fluctuations should be investigated and remedial action taken without delay.
- 3.15 The exposure of documents to constant light should also be kept to a minimum. Dedicated storage rooms should not have windows, and artificial light should also be minimised, for instance by the use of automatic timers or sensors.
- 3.16 Overhead lighting should be positioned at least 50cm above shelving to avoid the localised heating of documents. This distance is also required by the landlord for fire safety reasons.
- 3.17 The air in storage areas should be filtered and free of pollutants (such as dust and traffic fumes). Shelving should also be ventilated, with documents stored away from the ceiling and floor to allow for the free movement of air.

Storage furniture

- 3.18 Storage layouts should be designed to maximise the available space, without jeopardising health and safety concerns.
- 3.19 Furniture should be selected according to the following criteria:
 - The size and shape of documents
 - The storage medium (paper, CD/DVD etc.)
 - The frequency with which documents are likely to be consulted
 - The sensitivity of the information, and volume of such
 - The available space (including ceiling height)
 - The structural nature of the building (floor loading capacity)
- 3.20 Whichever type of storage furniture is selected, it should:
 - Be durable, and able to carry the weight of boxes/files when filled to capacity
 - Be made of non-combustible material that does not emit harmful substances
 - Not contain sharp edges
 - Have easily-adjustable shelves, to accommodate boxes and folders of different shapes and sizes
 - Be lockable (using a key or combination) to prevent unauthorised access
 - Allow for sufficient air circulation around documents
 - Have provision for labelling units and individual shelves

Packaging materials

- 3.21 Archival material should be stored in packaging that will offer the maximum amount of long-term protection. Ring binders should not be used; instead, the contents should be removed and transferred to archival-quality boxes or folders.
- 3.22 Archival-quality boxes and folders should be sourced from a specialist supplier of such materials. They must be made from acid- and lignin-free material and of a suitable size

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and shape for the documents requiring protection. Boxes should have easy-fitting lids, which may be secured through the use of unbleached archival cotton tape.

- 3.23 Boxes and folders should not be overfilled as this can cause damage to the documents inside.
- 3.24 Packaged documents should safely fit on the available shelving units without protruding over the edges. Boxes should be stacked no more than three high.
- 3.25 For non-archival material, no special packaging materials are required. However, documents should be stored in folders or binders that are in good condition, and clearly labelled to assist with retrieval and disposition.

Storage location codes

- 3.26 A clear and consistent numbering system should be devised and applied to all dedicated storage rooms.
- 3.27 Each storage room should be assigned a code, to be marked on corresponding floor plans and, if possible, indicated on a sign outside the room.
- 3.28 Additionally, each storage unit (individual shelving unit, cupboard, or single bay of mobile shelving) should also be numbered, as should each shelf within the unit⁷.
- 3.29 The numbering system shall improve intellectual control by allowing the physical location of a document or file to be easily expressed as a reference number. It shall also facilitate the tracking of movements, quick retrieval of documents, and implementation of disposition actions.


Health and safety

- 3.30 The layout of storage rooms should allow adequate space for staff to safely retrieve or replace documents on the shelves. All shelves, drawers or compartments should be easily accessible and free from obstructions.
- 3.31 Where the tops of shelving units are too high to reach without assistance, free-standing access steps should be provided in the storage area.
- 3.32 All staff that may use specialised equipment, such as mobile shelving, should be trained on the safe and proper use of such equipment. Reminder notices on safe usage, as well as alerts of potential hazards (in the case of broken/malfunctioning equipment), should be clearly displayed in the storage area.

Maintenance of storage rooms

- 3.33 Storage rooms should be kept clean and dust-free. Cleaning arrangements should be considered in the design of storage areas, as the build-up of dust in awkward spaces can attract pests or mould.

⁷ This is only necessary for dedicated storage rooms and need not apply to shared cupboards in rooms occupied by staff.

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3.34 Materials that could attract insects (such as food products, pot plants or wool carpets) should never be kept in document storage rooms.

Security concerns

3.35 Due to the irreplaceable nature of authoritative documents, and the potential sensitivity of their content, storage areas must be adequately secured against intruders or unauthorised visitors, in accordance with EIOPA's security rules⁸.

3.36 Documents containing sensitive information, as well as vital records, should be granted additional protection by storage in safe cupboards.

3.37 Doors and doorframes to storage rooms should be strong enough to resist unauthorised entry. Keys to document storage rooms and safe cupboards should be kept in a combination safe, with access to a restricted number of personnel.

3.38 Visitors to document storage rooms, including cleaning or maintenance staff, should be supervised at all times.

3.39 All document storage areas should be fitted with smoke detectors and alarm systems. Alarms should be automatically linked to the local fire service.

3.40 Fire risk assessment and plans should include a warning that the indiscriminate use of water can cause serious damage to documents.

3.41 In case of minor flooding, the lowest shelves on which documents are stored should be at least 15cm off the floor.

3.42 EIOPA's disaster recovery plan should incorporate measures for protecting documents (especially archival material and vital records) in the case of an emergency. This should include guidelines for salvaging damaged documents, a list of available emergency equipment and supplies, and a list of external contacts who have agreed to assist EIOPA if the need arises⁹.


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 (EC) 45/2001 and the related implementing rules contained in the Decision of the Management Board EIOPA-MB-11/050.

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 (provided that is subsequently expressly permitted by EIOPA internal rules).

⁸ Rules on Handling EIOPA Information and Documents (WOI/LSO/36).

⁹ This could include local institutions with large freezer cabinets, which can be used to protect water-damaged documents until a longer-term solution is found.

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5. Roles and Responsibilities

- 5.1 It is the responsibility of **all the persons mentioned in point 2.7** to store physical documents in their possession according to the provisions of this policy. Staff must notify the Document Management Specialist of any authoritative documents requiring transfer to Centralised storage, as soon as such documents are no longer in active use.
- 5.2 The **Document Management Specialist (DMS)** is the owner of the present document, having the responsibility of monitoring compliance with the provisions contained therein. The DMS is also responsible for the management of EIOPA's Centralised storage room(s), ensuring that all contents – particularly archival material – are packaged, arranged and labelled appropriately.
- 5.3 **Document Management Correspondents (DMCs)** are responsible for alerting the DMS to document storage needs and any related issues that arise in their department, unit or team.
- 5.4 **Heads of Department** and **Heads of Unit** are responsible for ensuring that the provisions of these Working Instructions are properly applied and used by the staff under their coordination. They may also assign designated key holders for Intermediate storage rooms/cupboards in their areas of responsibility; and for notifying the Local Security Officer of the names of key holders (including any changes).
- 5.5 The **Corporate Services** team shall support the allocation and maintenance of document storage areas within EIOPA's premises.
- 5.6 The **Local Security Officer (LSO)** has an advisory role regarding the provisions relating to security and the physical protection of documents; particularly those containing sensitive information. The LSO is also responsible for maintaining a list of authorised key holders and combination settings for document storage rooms and safe cupboards in EIOPA's premises.
- 5.7 The **Data Protection Officer (DPO)** has an advisory role in matters related to the protection of personal data.

6. References

Legal and Regulatory Framework and International Standards

- Council Regulation (EC, Euratom) No 354/83 (as amended) 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 (EC) No 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 the Community institutions and bodies and on the free movement of such data
- Collected Decisions and Implementing Rules – Document Management in the European Commission – Chapter II.4 *Preservation of the institution's files*
- ISO 15489-1:2016, Information and documentation -- Records Management

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- ISO 11799:2015, Information and documentation -- Document storage requirements for archive and library materials
- BSI: PD 5454:2012 – Guide for the storage and exhibition of archival materials

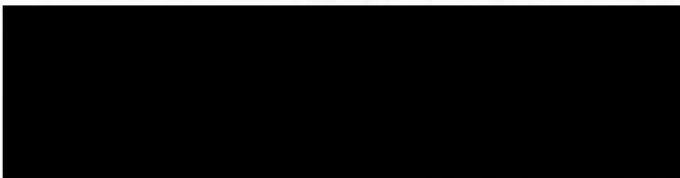
Related EIOPA Decisions, Policies and Internal Procedures

- EIOPA Document Management Policy, POL/DMO/40, dated 28.04.2017
- EIOPA Security Policy, POL/LSO/35, dated 18.12.2014
- EIOPA Business Continuity Plan (EIOPA-15/013)
- Rules on Handling EIOPA Information and Documents (WOI/LSO/36), dated 09.03.2015
- 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)

7. Entry into force

This Policy shall enter into force on 28 August 2017.

Done at Frankfurt am Main, on 28 August 2017




Executive Director

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Annex 1 – Storage location for document types

Storage location	Documents to be stored in this location	Conditions (if any)
Decentralised storage	<ul style="list-style-type: none"> • Authoritative documents that are still in active use (<i>active files</i>) 	<i>Must be transferred to Intermediate or Centralised storage at the earliest opportunity</i>
	<ul style="list-style-type: none"> • Copies of documents, kept for reference or convenience purposes 	<i>Should be securely destroyed as soon as no longer required</i>
	<ul style="list-style-type: none"> • Non-business-related documents 	<i>Not covered by EIOPA's rules on document management</i>
	<ul style="list-style-type: none"> • Personal records relating to HR matters, or social activities connected with work 	
	<ul style="list-style-type: none"> • Personal notes and reminders 	<i>Not covered by EIOPA's rules on document management</i>
	<ul style="list-style-type: none"> • Drafts and work in progress 	
Intermediate storage	<ul style="list-style-type: none"> • Authoritative documents that may still require occasional consultation (<i>semi-active files</i>) 	<i>Transfer to Centralised storage once inactive</i>
	<ul style="list-style-type: none"> • Non-archival material 	
Centralised storage	<ul style="list-style-type: none"> • Authoritative documents that no longer require regular consultation (<i>inactive files</i>) 	
	<ul style="list-style-type: none"> • Archival material 	<i>Must be stored in archival-quality boxes or folders</i>

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Annex 2 – Risk assessment of storage locations

Storage location		Benefits and risks
Decentralised storage		Documents can be readily accessed or consulted when in active use
		Documents locked in personal areas are inaccessible to others; creating unnecessary information silos
		Lack of control over environmental conditions; a risk for the preservation of archival material
		Security depends on the discretion of individual staff
		Difficult to monitor compliance with the provisions of this policy
Intermediate storage		High risk of inconsistent practices in document storage
		Offers some control while also allowing documents to be retrieved fairly quickly when needed
		Offers a good level of security; the room is locked and accessible by a restricted number of personnel
		Storage space is limited; must be carefully managed
		Document storage is dispersed around the building; less easy to track and retrieve documents
Centralised storage		Risk of documents being stored alongside other materials or equipment; against best practice
		Offers the highest degree of physical and intellectual control; management of documents can be supervised by the Document Management Specialist
		Allows regular monitoring of compliance with this policy
		Offers a high level of security; the room is locked and accessible by a very restricted number of personnel
		Offers the highest degree of space optimisation; layout is designed with the storage of documents in mind
		Documents are located further away from working areas and cannot be retrieved so quickly