EUROPE'S RAIL JOINT UNDERTAKING DOCUMENT MANAGEMENT POLICY

Version 3.0

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DOCUMENT HISTORY

Version	Date	Comment
1.0	09/01/2017	Document creation
2.0	14/11/2018	Implementation of ARES migration changes and e-Domec implementing rules
2.1	01/08/2021	Annex I: Repealed EC legislation: - Implementing Rules EC(2020)800 for Commission Decision (EU, Euratom) 2020/4482 of 6 July 2020 on records management and archives - Commission Decision (EU, Euratom) 2020/4482 of 6 July 2020 on records management and archives Annex II: Filing plan Annex III: Retention list New Annex IV: Document signature and delegation New Annex V: E-mission procedure Minor updates into the DMP
3.0	19/122022	Updated Annexes: Annex I:

		- Commission Decision (EU) 2021/2121 of 6 July 2020 on records management and archives – Article 11 on Validity of documents and procedures (QES) Annex II: Filing plan Annex III: Retention list Annex IV: Document signature and delegation Annex V: E-mission procedure New Annex VI Usage of QES Minor updates into the DMP – mainly following the O365 migration

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1. Introduction

As stated in the internal control standards (ICS) rules of the Europe's Rail Joint Undertaking (EU-RAIL) adopted on 08/04/2016, and in particular the ICS 11-Document management rules, the EU-RAIL document management systems and related procedures should comply with relevant compulsory security measures, provisions on document management and rules on protection of personal data.

Document Management Policy (DMP) includes procedures and tools in place for managing the processing of documents in the JU according to a well-managed administration. The policy aims to meet requirements regarding access, security, security of information systems, protection of personal data, confidentiality, classification scheme of documents, workflow and authorization and harmonised formatting. It also includes the specific provisions for the electronic and digitised documents.

The DMP covers all paper, born-digital and electronic documents, as drawn up or received by EU-RAIL and belonging to its documentary resources and the procedures managed by the IT systems.

In 2017, JU submitted a request to the European Commission Secretariat-General to deploy ARES Tool in the JU. The introduction and migration to ARES took place on 1 June.

After the necessary staff training and enough experience gained on the new tool in production, EU-RAIL DMP has been revised in order to ensure that correct and consistent implementation of the document management process is ensured.

2. Purpose

EU-RAIL DMP is aligned with the EC Implementing rules on document management and electronic and digitised documents[1], with other relevant procedures and existing internal documentation (i.e. Manual of Financial Procedures etc.) and IT tools (ABAC tools, H2020 tools, EMI, etc.) which may include the treatment of documents in all their aspects.

The purpose of this document is to define:

1. The rules of document management and electronic and digitised documents under ARES. In particular, it concerns:
(a) The registration of documents;
(b) The filing of documents and the management of files;
(c) The preservation of the JU's files (the JU must be in position to produce or reconstruct the files and respect the administrative retention periods);
(d) The appraisal and transfer of files (transfer to historical archive after the retention period is confirmed);
(e) The principle that an electronic system for document management, procedures or transmission must offer the same guarantees, in terms of security and controlled

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access to data, as would be provided in the traditional environment of physical media, in particular paper.

In order to ensure full compliance with those principles, the JU is applying by analogy the Commission General implementing rules on document management[2] and electronic and digitised documents, available in **Annex 1** of this document.

2. The rules of document management for documents not covered by the registration requirement and other provisions specific to the JU, such as:

- File management for working documents (organization structure of the EU-RAIL shared-drive, physical documents)
- Access policy and confidentiality
- Version control, naming convention of individual files
- Corporate design (formatting, layout, logo)
- Archiving procedures (SharePoint and IT tools)

3. Organisation and structure

The documentation management system of the EU-RAIL consists of:

1. Hermes-Ares-NomCom (HAN);
2. System generated and uploaded digital documentation available in IT tools used by the JU (ABAC systems, SyGma/Compass, EMI, etc.);
3. Paper archives of physical documents – SharePoint.

Hermes

Hermes is the common electronic repository that holds current and semi-current records registered in the JU's general registration system Ares. Hermes stores JU records and files in a single location in order to:

- preserve the JU's documentary heritage,

- avoid gaps and duplications,

- help JU to share information and access its records and files on a need-to-know basis.

Ares

Ares is the JU's general registration system used for registering and filing the records of the JU and storing them with their metadata in Hermes.

On top of registration and filing, Ares offers multiple functionalities, such as the creation of workflows, full-text searches, security management, etc. Ares is interfaced with the NomCom application which facilitates the operations of filing. In Outlook, the AresLook functionality allows end users to register and file emails directly into Ares.

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[2] Commission Decision (EU, Euratom) 2020/4482 of 6 July 2020 on records management and archives

NomCom

NomCom is the IT application that manages the filing plan and the file lists for the JU and gives a single identifier to all official files.

NomCom is directly accessible to Ares users and other HRS users.

However, despite the use of ARES, SharePoint remains an important work environment and is still concerned with this document.

3.1 Document Management Committee (DMC)

A Document Management Committee (DMC) composed of the DMO, the Head of Corporate Services and the Head of Programme governs the Document Management Policy.

The DMC shall meet twice per year to discuss the evolutions and the implementation of the DMP with the EU-RAIL, and where necessary, propose updates. Based on the outcome of the meetings, the DMP can be updated and submitted for approval to the Executive Director on a yearly basis. Any updates shall be communicated to the staff.

Any staff member may submit proposal to the DMO who will submit them to the DMC.

3.2 Filing plan

Where appropriate, themes within the document archiving should be adhered to across the filing structure.

The aim of the filing plan is:
- To provide an overview of the JU documentary resources;
- To ensure the consistency of the filing system across all common sectors of activity;
- To make it easier to find files and documents by means of the metadata used for the filing plan headings and files.

The aims of filing are to:
- Interpret and use records in the context in which they were created, so that they provide a full account of the administration's activities and serve as proof of the work it has carried out;
- Facilitate targeted searching by making the file and constituent records more traceable throughout their lifecycle;
- Improve the quality and continuity of administration, especially where another member of staff takes charge of the case and/or it is taken over by a different department; and
- Assign the record its retention period and disposal action (elimination or transfer to historical archives), according to the retention category of the file.

The filing plan is divided into a pre-defined nomenclature and is available in **Annex 2** of this document. The EU-RAIL filling plan is integrated into the Commission Common nomenclatures' filing plan updated in 2020.

It is managed with the NomCom IT application provided by the Secretariat-General under the responsibility of the DMO.

In order to ensure consistency between the filing of document registration and working documents, the filing plan structure and SharePoint structure intend to be aligned in a similar way.

3.3 Organisation units – Lead departments

The responsibilities inherent to:
- The verification of the appropriate use of the filing plan and correct filing of documents in ARES;
- The verification of the correct filing of uploaded digital documentation available in IT tools used by the JU (ABAC systems, SyGma/Compass, EMI, etc.);
- The verification of the correct filing and versioning of working documents in SharePoint and paper filing;

Is defined by the structure of EU-RAIL Organisation units:

(a) **EU-RAIL.ED**: Executive Director and Governance
Responsible: Assistant to the Executive Director/DMO
    a. Communication
       Responsible: Assistant to the Executive Director/DMO
    b. Human Resources
       Responsible: HR Assistant

(b) **EU-RAIL.ED.RI**: Research and Innovation
Responsible: Head of Programme
(c) **EU-RAIL.ED.CS**: Corporate Services
Responsible: Head of Corporate Services

The assignment of each lead departments to the corresponding file nomenclature is available in the filing plan (Annex 2).

4. Document management and registration

The implementing rules governing the document management and electronic and digitised documents, available in Annex 1, are considered as being the most important section of this document.

In addition to rules applicable in ARES of filing and the keeping of the JU's files (Chapter I[3]), of the preservation of the JU's files (Chapter II and EU-RAIL Retention list in **Annex 3**), of the appraisal and transfer of files to the Historical archives, and of the electronic and digitised documents, the main principle consist in identifying the documents to be registered (Chapter I).

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[3] Reference of e-domec, document management implementing rules, chapter – see Annex1 of the present document

Documents to be registered are all documents, regardless of the medium (also including emails), that:
- (a) are received or formally drawn up by EU-RAIL in the course of its activities;
- (b) either are likely to require action, follow-up or a reply from EU-RAIL or involve the responsibility of the EU-RAIL;
- (c) may have legal, financial, HR implications;
- (d) contain important information which is not short-lived.

Documents that are drawn up as effective administrative or legal evidence of decisions, situations, intentions or events linked to the activities of EU-RAIL must also be registered.

Documents which fulfil either the condition set out in the preceding paragraph or all the conditions set out in paragraph (a) to (d) above must be registered.

It is not necessary to register a document in ARES if it is already registered in a specific register and vice versa (e.g. ABAC, H2020 tools, etc.).

A specific register must fulfil the same criteria as the general register and the procedure involved must afford equivalent guarantees.

When deciding if a document should be registered, the key issue will often be to decide whether it is important and not short-lived

5. Other documents

Documents that do not fulfil the conditions set out in chapter 4 are exempted from the registration requirement.

Important and not short-lived are criteria subject to subtle judgment that will vary with the content and context of the document. Documents containing information which is unimportant and short-lived are, in contrast, documents:
- whose loss would not prevent the sectors concerned to meet EU-RAIL's administrative or evidential needs;
- whose value is clearly temporary and rapidly lapsing, ancillary and instrumental;
- which are considered or treated as unimportant and short-lived by a records schedule, a procedural regulation or routine administrative practice.

Nevertheless, the fact that a document has not been registered does not prevent it from being kept as a supporting document in the concerned file in ARES as an aid to a better understanding of how an issue has been handled.

This section will cover the internal rules that apply when a document is not registered in ARES but is kept in the EU-RAIL SharePoint.

These *internal procedures* aim at facilitating the application of the following basic rules:

Rule 1:
When creating a new file, staff must have in mind 3 aspects: ***Name/ Location/ Layout***

Rule 2:
The "owner" of the file or the recipient is responsible for its exact ***filing under the appropriate folder*** in the proper format on the SharePoint, for its further development, as well as the related correspondence.

Rule 3:
Apply the corporate design rules when drafting files: ***templates, layout, logo***.

Rule 4:
Use the SharePoint for ***storing*** *corporate* documents of all nature and **never your personal drive, cloud drive or e-mail**.

Rule 5:
For internal correspondence, ***send links <u>to the folders</u> (not to the document itself) where they exist*** instead of attaching them to e-mail.

Rule 6:
Respect the process based structure of SharePoint and do not structure it for personal convenience. Instead use ***short-cuts,*** for example on your personal desktop, if the documents & folders you access frequently are very dispersed on SharePoint. If in doubt, always consult a member of the Document Management Committee (DMC).

Rule 7:
On working documents/ adopted documents subject to updates ***respect the versioning control rules***.

5.1   Structure and design of SharePoint

The structure and design of SharePoint is based as much as possible on the Europe's Rail JU filing plan in ARES.

With few exceptions, the first 3 levels of SharePoint are fixed and no circumstances additional folders should be created at these top levels <u>without agreement from the DMC.</u>

Folders can be created below this level on a needs basis for the specific activity concerned and under the responsibility as described in the chapter 3.3 <u>and with the prior consent of the DMC</u>.

5.2   Placing and finding documents

The following describes the SharePoint structure by top level directories and provides a guide to what types of documents to place and find in each area.

- **First Level - EU-Rail environment**

- **Second Level – EU-Rail JU**

- **Second Level – S2R JU**

5.3 Sub-folders

Where appropriate, themes within SharePoint should be adhered to across the directory structure.

Themes apply to specific activity areas that recur and are generic under multiple branches of SharePoint, for example meetings.

Meetings can apply to the Governing Board, to the Scientific Committee etc. They should adhere to the following folder naming convention:

YYYYMMDD – Short descriptor (- meeting number)

Where YYYY four figure year, MM two-digit month, DD two-digit day and short descriptor
20161025 – GB – Meeting 1

If the meeting complexity warrants it a further breakdown of documents should be applied under this folder:

01 – Meeting Preparation
02 – Meeting Documents
[03 – Reimbursements] *(when applicable)*

5.4   Naming convention of individual files, Track changes usage, Version control

The following important aspects must always be taken into consideration when working on internal documents. SharePoint automatically manages versions of files for you and by default it saves the last 500 versions, which should be more than enough for most purposes. This versioning is possible thanks to the auto-save function that should never be disabled when you are opening the document for updating it, otherwise it leads to synchronisation conflicts and file overwriting.

5.4.1   Naming convention of individual documents

When creating a new document, the owner must consider a few basic principles:

- Name must be given in relation to the type, scope and object of the document.
- Name must be short and if possible, use predefined acronyms: AWP (Annual Work Plan), MAAP (Multi-Annual Action Plan), etc.
- If it is a working document, it must keep the same name for the current version of the document, that way it is always clear that people are accessing the current version.
  It is to be noted, that the auto-save shall limit the number of document versions to be created. <u>The document owner would provide recommendations to the editors if a specific version should be kept with a version number</u>. In principle, new versions are required to keep track of each "release" of a working document (e.g. when a document is sent to external stakeholders for comment or review, when there is a need to keep a clean version and track changes version, or when the status of a document changes from draft to final, etc.). This makes it clear that people are accessing an old copy of a document. For example, for repeating meetings (without release of documents), keep the same agenda document from meeting to meeting, use it to take the minutes in real-time during the meeting using co-editing, save the copy to a minutes of meetings folder at the end of the meeting, then clear the agenda for the next meeting, etc.

The format and sequence of the elements in the file name is important. There are two mandatory elements:

1. ***Descriptor***
   This is the element which describes the purpose of the document.

2. ***Version Number***

   This should always begin with either the date (YYYYMMDD format) and/or a small "v" followed always by a digit, the document status (draft/final/etc.) – always separated by underscores (no use of space).

Examples:

Monthly report data_v00_2022-10105	Data extracted – baseline for the v1 document creation – owner of the document is VDE
AWP22_ 20220405_ v02_ draft	AWP 2022, second document version (potentially after having received the first set of comments from the GB), revised by CMB
AWP22_20220612_ v03_Final	Final version for GB adoption and publication (see next chapter)

Nevertheless, the name versioning shall not be used in the case the automatic versioning is available under sharepoint.

3. *Version Text*
   Optionally a short text can be inserted to indicate the usage of the document (e.g. "*sent to GB*" or one of a number of predefined categories such as "Draft", "Final", "Published")
   By following the above naming convention, the list of documents will be "auto-sequencing" when viewed on SharePoint.
   Procedure documents should also have a Revision History tables which maps to the version number of the files. This table can contain more information about what was changed in the document, by whom, etc.

5.4.2 Version control

With regard to the version control policy in the EU-RAIL, a few simple but key rules must be applied in order to facilitate an efficient process for establishing documents as required by the EU-RAIL Regulation.
Internally drafted documents basic rules:

- When sharing a document with colleagues per email, it should always be done without attachment, with the link of the main folder containing the document sent per email (or with automatic notification "Share / Share folder"). Considering the above section on versioning, this approach would prevent colleagues from using the wrong document. Make sure they follow the same process. Otherwise, multiple and divergent copies of the same document will be created.
  Sharing a document directly is also possible, but this approach should be used mainly when a document does not have multiple version (e.g. a presence list for staff booking offices)
- Use SharePoint as a working place for documents; otherwise, the "latest" version is not visible.
- If you need to work on a shared document off-line (e.g. while in the plane with no internet connection), then it is absolutely essential that you contact and received the agreement of the document owner. The document owner would therefore ensure to

inform the other editors (with instruction to continue editing or not) and, when applicable take a copy, create a new version and update the name with the staff initials on SharePoint. With the objective to either indicate other people not editing it in parallel thereby creating divergent content and non-sequential versions, or to manage the merger of both versions afterwards (when the colleague in mission has put back the document with her/his initials in SharePoint).

- Paragraph on synchronisation issue (option merge or create duplicate) + contacting last person(s) modified looking at history.
- In case of synchronization issue, you may check history to contact the last person who modified the file, to avoid any data loss.
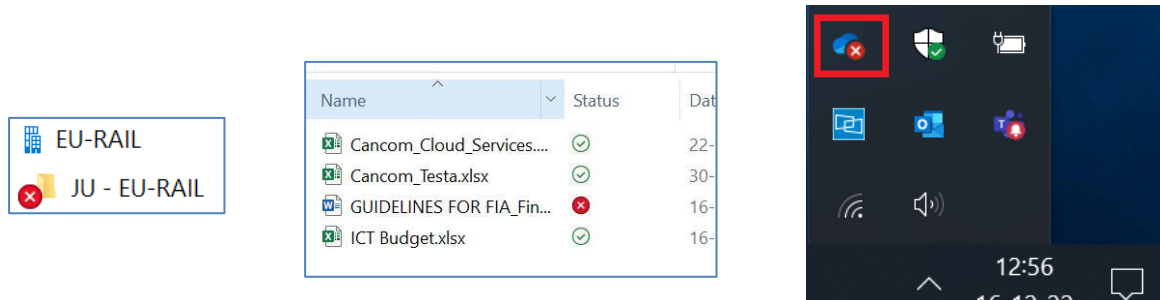
- OneDrive app notifies a conflict via the red cross, click on the OneDrive icon at the bottom right of your desktop, click on "There is a sync issue in OneDrive".
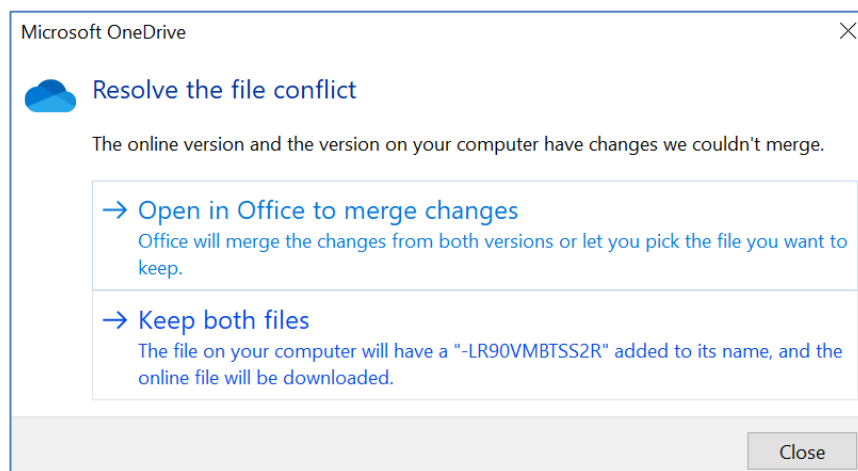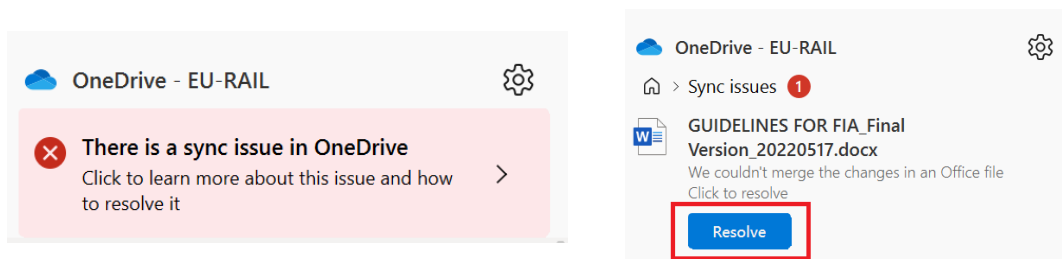
And you need to choose:
- - "Keep both files" to create a duplicate file
  - ➔ It allows to check the duplicate file for your potential changes and delete this duplicate if not needed.
- - "Open in Office…" to merge the changes.
  - ➔ requires to contact the last person who modified the file and check if his changes would not be deleted, for example a section you were both

working on. You need to be sure that nobody did changes at the same locations in the file, otherwise the first option to create a duplicate, compare and clean-up is always safer.

- <u>The document owner uses a version number (v01)</u> in the file name as described in the section on file naming and maintain a matching version log table in the document.
- <u>Use the track changes</u> option in Word when required
- Once finalized internally, the document is released with version text ("Final", "published", etc.).

<u>External documents basic rules:</u>
- When receiving documents from third parties as part of the Grant preparation phase, reporting or dissemination always keep the last approved version by the owner (PO/FO) in the main folder and store all the other older version under a folder named ''Obsolete'' or ''Old''.

6. "Confidentiality" policy

This section does not cover EU Classified Information but EU-RAIL Restricted documents, whose access shall be limited due to their content, such as personal data, commercial in confidence information, CDR and evaluation reports, procurement documents not yet decided, etc. hereinafter "confidential data". The document originator or receiver may consider where appropriate to stamp these documents with a red stamp "EU-RAIL Restricted" in ARES.

Documents containing confidential data are stored in ARES files or SharePoint folders with restricted access. For example, the "HR Confidential" subfolder shall be accessible only to a limited number of Officers established by the Executive Director. Paper documentation that falls in the aforementioned definition shall be kept and locked in a storage cabinet in the relevant office of the personnel authorized to deal with it.

6.1   Mail

Documents arrive by mail. This may be an important source of documents with legal and financial implications. Therefore, incoming and outgoing mail shall be registered and scans of the documents are taken as needed. These scans are then uploaded to ARES or other IT tools, or placed on SharePoint when no registration is needed (chapter 5).

Please consider that the Assistants are authorized to open all mail addressed to each staff member, unless the relevant mail is explicitly identified as "confidential" matter on the envelope or package.

As far as possible and with the exclusion of personal communication related to EU-RAIL position, no personal mail or packages shall be received by staff in the EU-RAIL premises.

6.2   Confidential Post

As already mentioned, the secretariat is not allowed to open incoming mail with the mark/stamp 'Confidential' or similar. The addressees are obliged to keep confidential information secure and take the appropriate measures in order to maintain the confidentially of data received. When assessed by the recipient, the document should then be stored and made accessible, if appropriate, to the relevant colleagues.

6.3   Document Confidentiality Statement

If confidential material is being drawn up by JU staff, the document must duly identified as "EU-RAIL Restricted" in red capital letters and contain the following sentence in the footer: *'The information in this document is confidential to the person to whom it is addressed and should not be disclosed to any other person. It may not be reproduced in whole, or in part, nor may any of the information contained therein be disclosed without the prior consent of the EU-RAIL. A recipient may not solicit, directly or indirectly (whether through an agent or otherwise) the participation of another institution or person without the prior approval of the EU-RAIL. Any form of reproduction, dissemination, copying, disclosure, modification, distribution and or publication of this material is strictly prohibited.'*

7. Standard Templates

To ensure standardization there is an approved set of templates for saved in defined locations accessible to all staff on SharePoint. Staff shall use these templates as needed. Some templates include model text (yellow) and guidelines.

The templates will need to be shared with the Members and Partners of Shift2Rail, when needed, to ensure a harmonized enforcement of the Shift2Rail corporate visual identity. The Templates will need to be added to the briefing of new Members of the Staff by HR and/ or the relevant Unit.

As defined in the templates register, each template as an owner who is responsible for the updates needed.

8. Archiving (SharePoint or IT Tools) and use of System Records

The preference is for information to be saved in a structured form in ARES, IT systems rather than as documents uploaded to SharePoint. This is in line with the H2020 move towards paperless administration and e-signatures. Most of the IT systems allow the printing of data in reports when a paper copy is required.

9. Public access to JU documents

EU-RAIL Regulation (Article 6) states that Regulation (EC) No 1049/2001 of the European Parliament and of the Council (4) shall apply to documents held by EU-RAIL and that EU-RAIL shall adopt practical arrangements for implementing this Regulation.

In this sense, EU-RAIL has adopted practical arrangements for implementing Regulation (EC) No 1049/2001 [4]. In principle, the widest possible access to documents should be ensured, subject to the principles, conditions and limits defined in Regulation (EC) No 1049/2001.

10. Right of access to personal data

This document management policy shall be interpreted without prejudice to the right of individuals to have access to personal data concerning them as stipulated in relevant Union legislation, in particular 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 movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC [5].

11. Final remarks

In case of doubts in the interpretation of this policy, the matter shall be referred to the DMC possibly through the Assistant of the ED or submitted to the attention of the Legal Officer of EU-RAIL.

This policy has to be interpreted in the light of the:

- Rules of procedure and public access to documents, in particular Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.
- Security and personal data protection rules.
- EU Classified information and any other relevant regulation on the matter.
- Code of good administrative behaviour.
- EU Financial Regulation and the EU-RAIL Financial Rules

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[4] Decision of the Governing Board n° 22/2015 of 11/12/2015 on the Practical Arrangements for Implementing Regulation (EC) No 1049/2001 of the European Parliament and of the Council Regarding Public Access To Documents: https://rail-research.europa.eu/about-shift2rail/structure-of-shift2rail-initiative/governing-board-2/

[5] EU OJ L 295/39 of 21.11.2018

Annex I

Implementing Rules EC(2020)800 for Commission Decision (EU, Euratom) 2020/4482 of 6 July 2020 on records management and archives

Commission Decision (EU, Euratom) 2020/4482 of 6 July 2020 on records management and archives

Commission Decision (EU) 2021/2121 of 6 July 2020 on records management and archives – Article 11 on Validity of documents and procedures (QES)

Annex II - EU-RAIL Filing Plan

Annex III - EU-RAIL Retention List

Annex IV - Document signature and delegation

Annex V - E-mission procedure

Annex VI - Usage of QES