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**WARNING:** This manual is not yet adapted to the document SEC (2009) 1643 on the recast of the implementing rules for the decision on document management and the decision on electronic documents and digitized.

# **FILING MANUAL:** **FILING AND FILES MANAGEMENT** **IN THE EUROPEAN COMMISSION**

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## 1. INTRODUCTION AND LEGAL BASIS

In the beginning of the year 2002 the Commission started a project called e-Domec. This project aims to improve document management in order not only to give a better service, but also to allow officials to show their work at its best.

A sound document management helps not only in cases of audit, as many think. It helps also to improve our work by knowing exactly what are our tasks, who is responsible of what, and especially, is an easy way to take over the work of colleagues when they are sick or they leave.

For a Commission worker, the main actions to carry out regarding documents are only four: register all important documents; file them in the appropriate file; preserve them and, when the moment comes, transfer the file to the Historical Archives Service.

The core aspect of document management is filing. By filing we put a document in its context. A document, by its own, has no importance for the administration as it is normally the result of other actions, -reflected in other documents- and will produce itself other decisions that will be reflected in future documents. Both preservation and transfer are done on a file basis. The file gives an overview of the work done by the institution concerning a given matter.

This work is reflected in documents, but, which documents really need to be in the file? All pieces containing relevant information have to be filed. Of course, registered documents are relevant for one case, and therefore it exist the legal obligation of filing all registered documents. A document is registered because:

- (1) It has been received or formally drawn up by a Commission department in the course of its activities
- (2) It is likely to require action, follow up or a reply from the Commission or one or more of its departments  
or  
involve the responsibility of the Commission or one or more of its departments.
- (3) It contains important information which is not short-lived.

In other words, a document is registered when we want to show what has been decided, when it was decided, who decided that, why... We register a document when we want to prove that something happened and the *how* and the *why*... Of course, all those *whats*, *hows*, *whens*, *whys*, and *whos* are related to our job, to one of the tasks we are carrying out... so, to one file.

This manual aims to solve most common filing questions and problems. For further information regarding other aspects of document management, please check the appropriate manual: [Manual for Registration](#), [Guidelines for registration of e-mails](#), [Manual for elaboration of a Filing Plan](#), [Guidelines for the transfer of files to the Historical Archives](#) and Manual for Preservation (ongoing)

## **2. DEFINITIONS**

### **2.1. Chef de File**

At a given moment in the course of a case, one unit is always *Chef de File* within the service. The *Chef de File* is in charge of this case, even though another unit may be involved in performing related tasks or other units may provide ad hoc assistance.

Within the unit, one or more persons are designated to work on this file, they will be responsible to allocate each document to its file and to ensure that the logical unity of the file is maintained even if the case is conducted in conjunction with several entities within the service.

### **2.2. Common Nomenclature**

According to the implementing rules, the Common Nomenclature is: "a hierarchical body of terms, concepts and headings which make up the first three levels of the institution's filing plan". In other terms, the Common Nomenclature are the first three levels in NomCom, further developed by DGs in order to compose, all together, the Institution's filing plan.

### **2.3. Document**

According to the provisions on Document Management, a document is: "any content drawn up or received by a Commission department concerning a matter relating to the policies, activities and decisions falling within the institutions competence in the framework of its official tasks, in whatever medium (written on paper or stored in electronic form, or as a sound, visual or audiovisual recording).

Anything that involves our service, for what we are responsible, or anything that requires our follow up is a document to be registered and therefore, to be filed. The key question is "If I loose this document, would I be in trouble? When the answer is "yes", I must register and file the document. Of course, not every piece of information that arrives to our office is worth to be registered.

### **2.4. File**

According to the provisions on Document Management, a file is a set of documents, constituted organically to form a coherent, relevant unit in terms of the actions carried out in the handling/implementation of a case.

Most of the files can be compared with a story. Each chapter of the story is each document. They are the steps we have taken to carry out a task, to solve a problem. Of course, in a public administration as ours, some of those "stories" are the same story year by year, or period by period. See the definition of [serial file](#) for more details.

The file is the main reference of our work and tasks, as it provides evidence, justification or information on the implementation of all actions carried out in the handling of a case, thus guaranteeing efficiency and continuity in the work.

The difference between file and filing plan heading is not clear for everybody: The activities of a department are reflected by its filing plan headings; the file is a "means" to implement these activities. The heading therefore includes only a list of files and it is the files which contain the documents. A file is something we want to solve, and thus, has an end (an action, a case). A heading is something that never ends: our mission.

## **2.5. File list**

A file list is created to have an overview of and to administrate all our files. It is normally done at unit level, and contains each file, with its code, title, the person or persons managing them, the "status" (open, closed, transferred...) and the heading code of the filing plan to which it is attached. The file list, according to Internal Control Standard 13<sup>1</sup>, has to be created for the official files. Working files don't have to be listed, although this information can be useful for some units.

Each file of the file list has to be linked to its Nomcom Heading<sup>2</sup>. Further information such as the location of paper files and the condition of mixed files (paper and electronic, in several applications, etc.) can be added.

## **2.6. Filing**

According to the implementing rules: "Filing and the management of the Institution's files" - SEC(2003)349/2, filing is an "operation involving identifying documents and ordering them in categories following the logical organisation, principles, methods and rules of a filing system". The implementing rules add a footnote to this definition: "in current usage, the term "filing" is often confused with "storing", a physical operation consisting, in the case of paper documents, of placing a document in a file and, in the case of electronic documents, for example, of saving the document to an electronic file."

This means filing is the intellectual operation of identifying the matter (the case) to which a document is related, and not the physical storage of this document. The "filing system" to which the Implementing rules refer is NomCom, so, for Commission purposes, a document is only filed if it's in a file attached to the Official filing Plan of the Commission<sup>3</sup>.

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<sup>1</sup> ICS 13: Each DG shall systematically register incoming and outgoing mail to enable efficient monitoring of deadlines and maintain a comprehensive and up to date filing system which is accessible to all appropriate staff.

<sup>2</sup> At the moment of writing this manual, the only tool that allows a link to the Nomcom heading is Adonis.

<sup>3</sup> The Official Filing Plan of the Commission is managed by the Nomcom application, which is updated by the Document Management Officers (DMO) of each DG.

## **2.7. Filing plan**

It is a hierarchical, logical structure that allows the management of department's files. A filing plan organises all files of the service according to some principles, common throughout the Commission, in order to facilitate not only document management, but homogenisation of procedures, mobility, transparency and accountability. The principles inspiring the filing plan are: The filing plan is hierarchical (from general to specific) and based on the Commission activities (and not on the organisation chart, key words, themes, etc. The reason for this is the activities remain stable, whereas the organisation chart changes very often.)

The filing plan is composed of headings, which are the reflection of the different “missions” of the Commission. When a new competence is given to the Commission, a new heading should be created. Those headings do not belong to a service. Normally only one service carries out this mission in the name of the Commission, and therefore, this heading will contain files from only one service. But it also happens that two or more services are involved in one task, and, thus, they will share this heading. It is important to repeat that a heading contains files, which contain the documents.

## **2.8. Heading**

A heading is each one of the elements of a filing plan and represents an activity carried out by the Directorates-General or related services. Their reference includes at least a title, a brief description of scope, a code and the Owner Department.

A heading represents an activity, i.e. one of the missions of the Institution. It is, therefore, supposed to last throughout time, whilst files have a beginning and an end, as they reflect the actions that this activity involves. A new heading is created only when a new policy or activity is created in the Commission. New activities can have their reflection also in tools such as the Annual Management Plan.

## **2.9. Official File**

The official file is the file for which the Commission is responsible, regardless of the support and location of its documents. We define "Official file" in opposition to "Working file" what is the set of documents gathered for working purposes. Some examples of working files are the copies of official files, the files containing information about a subject, etc.

## **2.10. Subfile**

Subfiles are just a way to organise documents within a file. They help to find easily a particular document of the file.

## **2.11. Storing**

As we saw, filing is the intellectual operation of linking a document to the case to which it refers by indicating the file code. Storing is the next operation and refers to the physical operation of storing the document with the rest of

the documents. For paper documents, it is introducing it in a binder. For electronic document it is attaching it in Adonis or any other tool. Normally, and especially in IT systems such as Ares or Adonis, both actions are done almost at the same time.

### 3. WHY DO I HAVE TO FILE?

“We have never filed...” “We always find our documents...” “Filing is a waste of time...” Those are the things that are commonly heard in the Commission, and that kind of reactions are normal when people think they have to change their habits. However, they are not true. We have always filed. Everybody has an idea of what their work is about, has divided it into actions to carry out, and has organized their documents according to this, in electronic folders, in Outlook or even in binders where he/she has paper documents. However, as each one of us has his/her own idea of what “filing” means, we would have thousands of different filing methods. What the e-Domec project adds is to rationalize the act of filing, in a simple and coherent way, easy to follow by everybody so no matters who is in charge of what case, the Commission can account on what has been done. This goal is shared also by other current provisions, such as Internal Control Standard 13 and Decision 2002/47.

“We always find back our documents” is (let’s admit it) not true. And if we are honest, the documents we have problems with finding are often key documents for the understanding of a matter, produced normally one or two years before the moment we realise they can't be found. A large majority of the audits carried out by IAS or the internal IAC of the DGs point out documentary lacks concerning the particular matter audited. It is true that we always find a document we received last week, last month, and if our memory is fine, a couple of months ago in some cases. But what about documents produced or received a long time ago? Or received by somebody else? How can we justify decisions taken by our predecessor who left function 2 years ago? It is easy to find an important document with a major decision written in it, but the preparatory work regarding this decision is written in other documents, “not so important” that should be together in the same file. Anyone who has faced an audit or a case before the court knows how important a document that is nowhere to be found can become.

Filing is like telling a story. When I file a document I write a chapter of what I am doing to solve a problem (in the name of the Commission). In that way, when a colleague of mine needs a quick access to the information, when we have to give account in front of an auditor or before the court, or just when I want to show my boss how complex a problem was, and how brilliantly I’ve solved it, the only thing I need would be the official file with me.

So, why do I have to file? Besides the legal obligation of filing<sup>4</sup>, I have to file because by filing I will have the following important advantages:

- Fast and coherent retrieval, even if I don’t know who was involved in a matter, when a decision was taken, when it exactly happened or what Registration numbers the documents have that I am looking for.

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<sup>4</sup> [see Implementing Rules for filing - SEC \(2003\) 349/2 .](#)



- Accountability, the only way to reply to an auditor is showing him/her the official file.
- Cooperative work, when everybody in the unit can access the Unit's files, in case of absence, the work can continue easily.
- Facilitate mobility, when I arrive to a new post and my predecessor has a clear list of files, in which I can see what has been done, what is expected to be done, etc.
- Rationalisation of tasks, when it is clear in an unit who does what, and where the important documents can be found, we avoid double work, or even better, we avoid the case of work not being accomplished, because "I thought it was someone else's task".

But, apart from the advantages, I have to file because I am an employee of the European Commission, and the Commission has, like every public administration, rules of procedure establishing the mandatory registration, filing and conservation of documents.

#### **4. WHAT DO I HAVE TO FILE? WHERE DO I HAVE TO FILE?**

The answer is easy: "I have to file at least all registered documents in the official file to which they are related" As we have seen, a file is the complete "story" of a case. All pieces containing relevant information regarding that case should be found in the file of the case. The tradition of the paper administration leads to the belief that filing is putting a paper in a binder. We'll see in this chapter what filing is according to the provisions on document management.

##### **4.1. Filing, an action in two steps. Difference between filing and storing.**

The mix-up of both concepts, filing and storing, is a very common misconception. According to the definition of filing, the act of filing is an intellectual operation, which consists of linking a document to its case, to the matter to which it is related. In other words: to its file. The way to file a registered document is to indicate the file code (or file title) among other metadata in the application where it is registered<sup>5</sup>. To choose the file code to which this document is going to be linked is an act of reflexion done by the person who knows what is the document about and, of course, what case is dealt within the file. The person who knows best where to file a document is therefore the desk officer. He/She knows better than anyone else what case is represented in the file, and if the document corresponds to that case. This doesn't mean that he/she has to do the filing operation him/herself; he/she can just indicate his or her secretary the file code to choose in Adonis, for instance. But the decision *where* to file that document is his/hers.

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<sup>5</sup> At the moment of writing this manual, only few applications contain a list of files linked to Nomcom, i.e. a list of official files. Adonis is the most well known.

The second step of the filing operation is Storing. Storing is the physical action that follows: to put the document (physically) together with the rest of the documents of the same case. There are several ways to do it, depending on the nature of the document: For paper documents, the way of doing it is to put the paper original in its binder, together with the other originals. In some services paper originals are kept centrally in a sort of Chrono. The storing operation is done, in this case, independently of the official files (the paper storing is not a mirror of the official files). However, the paper file can always be reconstructed through the file code of the register. Those Chronos can be justified in very few cases, and the decision of having this kind of storing has to be kept centrally by your DMO. As a general rule, Chronos must be avoided. For electronic documents the best way is to attach the document to the application in which is registered (Adonis, Cis-Net...).

The aim of the storing operation is linked to preservation and later retrieval. For electronic documents, we can consider that this second operation (storing) is done when we attach the electronic version of a document to the Adonis (or whatever system) sheet. When we do this, we are saving electronically a document in an electronic system, with the aim of preservation and later retrieval<sup>6</sup>.

At this moment, the electronic tools for record management used in the Commission such as the Adonis database ensures integrity, security and an audit trail that other means, such as outlook or the shared drive don't ensure. So, it is strongly recommended to use the different systems with the aim for which they were created: In Adonis we have the official list of files linked to the Official Filing Plan (in Nomcom) together with all official (registered) documents and its electronic version attached. The general register is the filling tool whereas other electronic tools are just working tools like Windows explorer and Outlook. There, we will have only working files. Working file means a kind of more flexible file for working purposes, where I can freely copy, delete, modify documents etc.

#### **4.2. Can a document be filed in more than one file?**

Of course. It may happen that a document is related to one or more subjects we deal with. A classical example is a mission report. The person who went on a mission will file this report in the file of the case that originated that mission. The budgetary unit of the DG would file the same document in a file to justify that the money involved in the mission was spent properly. When this happens, the way to file the document in two (or more) files is to indicate the two file codes for the document in the application where the document has been registered.

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<sup>6</sup> As a general rule, documents where the handwritten signature is a substantial formality must be kept on paper version. It is also advisable to keep the paper original of very important documents or documents that must be kept during a long period of time if the ERMS is not docElec-certified. To know under which conditions documents can be kept electronically, and which ones must be kept on paper, see the Implementing Rules of the provisions on electronic and digitised documents: (DocElec) ([http://www.cc.cec/sg\\_vista/cgi-bin/repository/getdoc/COMM\\_PDF\\_SEC\\_2005\\_1578\\_1\\_EN.pdf](http://www.cc.cec/sg_vista/cgi-bin/repository/getdoc/COMM_PDF_SEC_2005_1578_1_EN.pdf)).

The storage is easy for electronic documents (an Adonis fiche can have two or more file codes. When the document is attached, it can be retrieved through any of the file codes, so it "exists" electronically in all electronic files). On paper, it is more complicated as only one version of the original exists. In this case, the best option is to keep the original in the file which is to be kept longer according to the [Retention Schedule](#), and a copy (with mention to find the original) in the other file.<sup>7</sup>

#### **4.3. Is a chrono a file?**

Absolutely not. As we have seen, a file is a case, it is constituted organically to form a coherent, relevant unit in terms of the actions carried out in the handling/implementation of a case. In a file, all documents are put in context. A chrono is just a set of documents constituted chronologically. There is absolutely no relation between two documents of a chrono; it is impossible to tell the context of each document in a chrono. The fact of keeping a chrono is a waste of time, as it forces everybody to do proper filing in one side, and keep the chrono as a working file on the other. Depending on the organisation of the DG, this can be just a way of storing documents in order to save space (the complete file can always be retrieved through the file code in Adonis) but it does not constitute a file<sup>8</sup>.

#### **4.4. What if the file doesn't exist?**

Files represent cases, actions, and therefore they are closed when the case arrives to an end. When a new case starts, the first document (the one that "starts" the case) obviously has no file. When this happens, we must open a new file. Ask your Document Management Officer ([DMO](#)) about the procedure to create a new file in your DG (in some services this is centralised) if it's not the case, and you are appointed to create it, follow the instructions in chapter 6.1 of this manual.

#### **4.5. Can I file non-registered documents in an official file?**

The answer is yes. There is no obligation to do so, but it is not forbidden. In some cases, it can even be recommended. We know that an official file **MUST** contain all registered documents. But sometimes, documents that do not fall under the obligation for registration can contain information that is useful for the better understanding of the case. A press article, an external report, etc. are examples for this, as they can help to put some light on some decisions taken (and reflected in registered documents).

In paper files the way to do this is easy: just store the document within the file. For electronic documents, as we are speaking about documents that don't

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<sup>7</sup> Some DGs keep the paper originals in a single place. In this case, copies kept by services are just working files, as the "official" ones are kept physically in other place. Contact your DMO for more information about this.

<http://www.cc.cec/home/dgserv/sg/i/edomec/index.cfm?lang=en&page=photosdmo>

<sup>8</sup> The way of organising all incoming and outgoing documents chronologically constitute these famous "chronos" which are in no way a kind of filing. But of course, within an authentic file, reflecting an action carried out by a service, the documents that constitute it can be stored chronologically.

fall under the obligation of registration, there is a way of avoiding registration. Some systems, like Adonis, allow the insertion of documents without registration, such as the "repertoire" function. This practice has no registration value, but introduces the document in the system in order to be filed in the electronic file, along with the registered documents. In the future system Ares it will be possible to "save" a document and file it in the file as it is the case now in Adonis.

## **5. WHO HAS TO FILE. CHEF DE FILE**

We now know that all registered documents have to be filed. But who has to file? The person who does the registration? Not necessarily. Registration and filing are two different operations. They can be done by the same person, but they also can be done by different persons or even different departments. That will be the case of a DG with a centralised CAD<sup>9</sup> where the registration is done by one service, and the filing must be done by the attributed service.

Every file has a "Chef de File". This Chef de File is the unit responsible for dealing with the matter of the file. Please note that the "Chef de File" is a Unit and not a person. Within the unit, one (or more) persons are appointed to deal with the matter in question. They have the knowledge to determine if the document belongs to one particular file or not. As Chef de File one of their tasks is to take care of the completeness of the file, so that there are no missing documents. Other tasks are to be sure the file is opened when the case starts, and to take the decision of their closure once the case is finished.

The Chef de File is responsible for the filing of all pieces of the file, whether they are paper or electronic. If the file is hybrid (both paper format and electronic documents are filed in it) they are responsible to make the necessary arrangements in order to be able to reconstitute the whole file. Those actions are very simple and do not constitute a great amount of work, for instance, a note in the "fiche dossier" of Adonis indicating the location of the paper documents will be enough. It can also be noted other applications where documents of the file are registered, such as Abac, etc. In the paper file you can always write "electronic documents to be found in Adonis" under the same file code"

### **5.1. Chef de File that changes.**

It happens very often that a Chef de File changes. The change can be due to a reorganisation (so, a new unit takes over a task that was assigned to another one) or can be due to the distribution of tasks for a given kind of cases. This will happen normally in operational DGs like ECHO or ENV: for example, in a project one unit may evaluate the proposals, other unit may prepare the contract, execute the project, etc, and at the end another unit may be in charge of the financial aspects.

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<sup>9</sup> CAD stands for "centre d'administration de documents", the French for Document management centers. It is a service in charge of central registration of documents. For them it is easy to determine whether the document must be registered or not, but it is almost impossible to know in detail all actions of the DG in order to file it.

For the first case, a reorganisation, the former Chef de File is responsible for the completeness of the file up to the moment when the responsibility is transmitted to the new unit. The former Chef de File unit, besides the concrete aspects of the case, must also inform the new responsible unit of all aspects concerning the file, such as if the file is hybrid of paper and electronic documents, where are the paper originals to be found, if the documents are registered in a single application or in many, what documentation is to be expected, etc. So in the hand over of the tasks, it must be clearly defined not only the operational aspects of the subject, but also the documentary ones.

For the second case, it can happen that all units work at the same time in the same file. If it is so, there is always one unit that coordinates and is responsible for the whole project. This is the unit Chef de File. This unit must ensure that all pieces that must come into the file from the other units are there. It also can happen that the units do the job sequentially. In this case, there is a transmission of responsibility: each unit is responsible for the part they are concerned with. For instance, the financial unit is responsible for the completeness of the financial aspect of the file, if the pieces are registered in Abac, they are responsible to indicate that fact, etc.

If your unit becomes Chef de File for a new file, or several new files, make sure to be told where all pieces of the file can be found, make sure all required documents of the file were registered and filed in it, and ask whether the file is hybrid or not, and if so, in which application(s) were the documents registered and stored.

## **6. CREATION AND MANAGEMENT OF FILES.**

Files are the reflection of our work. And, like our work, they have a beginning and an end. There is a moment in which we start to deal with one question or problem, and a moment in which we solve it. The file, as reflection of our work, will also reflect those moments: for the creation, we will open a file. When the actions are finished, we will change its status to "closed"<sup>10</sup>.

### **6.1. Creation of a file**

A file is created when a new case is opened, when we start to work on a given matter. As we have seen, all official files are linked to a heading of the filing plan. So, to create a new file you just have to fill in the basic information ("metadata") of the file in an application linked to Nomcom<sup>11</sup>. Those metadata are:

- (1) Code of the heading in the filing plan: it is the code of the heading to which the file is attached.

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<sup>10</sup> As we have seen, serial files are files containing repetitive administrative actions, and are closed and opened according to the period defined (each year, for instance). This beginning and end are put somehow "artificially" because the action is more a "process" than an action itself.

<sup>11</sup> As said before, the only corporate application linked to Nomcom for the moment is Adonis. In the near future, Ares (horizontal application that will substitute Adonis) and other applications using Hermes modules will link their files to the official filing plan: Nomcom.

- (2) Code of the file: it is the specific code given by its creator, in order to identify and retrieve the file easily and fast. Contact your DMO in order to know if your DG has any provision for codification of files. Every file contains also an automatic code given by the application. This code is unique for each Commission file.
- (3) Title of the file: The title gives a brief description of the case handled in that file. It has to be brief, but has to be as exact as possible, even indicating the end of the file or some information which could indicate when the case will be closed<sup>12</sup>. The idea is to create a file having in mind that in a given moment, the action will be finished and the file closed. The one who better knows the real scope of the file is the unit Chef de File and its desk officer. Therefore it is strongly recommended to consult him for the title when these persons are not the file creators.
- (4) Chef de File: In this metadata we indicate the unit responsible for the management of that case. This field can be updated if the Chef de File changes, but a track of all Chefs de File of the file has to be kept. See chapter 5 for more details.
- (5) Date of creation: the date when the file was opened. This data is filled in automatically by the tool in which the file is created.
- (6) Date of closure: the date when the file was closed, i.e. when all actions carried out concerning a particular case have been finished and the problem is solved. This data is also filled in automatically, but the Chef de File has to take care that the file is really closed (the tag closed is checked in Adonis, for instance). This date is the basis for the retention periods of the file, and together with the retention schedule will determine how long a file has to be preserved.
- (7) Status of the file: there are only four possible status: Active (when the file is opened, but the work is still ongoing and therefore the file has not been closed yet) Closed (when the work is finished and the file is closed; no more documents are going to be filed in). Transferred: A the file gets this status when it is transferred to the Historical Archives<sup>13</sup>). Destroyed (if the file is physically destroyed, according to what is indicated in the retention schedule, this field will keep track of this destruction). Obviously, when we create a new file its status is Active
- (8) Content of a standard file<sup>14</sup>: Only when applicable, as some files are really well defined and must contain some well defined documents. If

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<sup>12</sup> For example "Adonis in the delegations" is not a suitable title, as the action is not clear (Is helpdesk included?) and Adonis has different versions and updates. A better title would be "Installation of Adonis 5.3 for the delegations".

<sup>13</sup> For paper files, the electronic system that lists the file keeps track of its location through this status. Electronic files will also be transferred to a specific repository of the Historical Archives service.

<sup>14</sup> Some DGs, such the Legal Service have a list of documents that must contain a standard file. However, Adonis doesn't allow the user to fill in this metadata, so this information is to be found only in the SJ intranet.

this is the case, this field will list all documents this file needs to be complete.

- (9) Electronic file management system: Some files will be managed fully or partially in other systems. This field facilitates the retrieval<sup>15</sup>. In systems such Adonis, this information can be filled in the "commentaires" field.

Once the metadata are filled in, the file officially exists, and documents can be filed in it. To ensure the correct storage of documents, the file has to be created physically as well. If it is a paper file, we will prepare a binder with the file code and title (at least) in the spine of the binder. If the file is mixed or completely electronic, you should create the appropriate electronic space to store the documents. E-Domec compliant applications like Adonis and Ares, are the best spaces to store electronic documents because they link documents to an official file. In some other cases, the DG may decide to create also a space in the shared drive to store electronic documents. This shared drive space must be considered only as a working space, it can never substitute the official filing. This practice has the advantage of being useful and easy to use, and, as a working space, allows the user to store non registered documents together with the registered ones. The disadvantage is that users tend to forget that the shared drive is just a storing space (skipping the filing in the appropriate tool) and that Windows explorer does not offer the same guarantees that Adonis, Ares, and other IT tools offer, such as access rights, security, back up, etc. Therefore, *the shared drive must be used as a working tool, and never be considered the official filing.*

To know the practice in your DG, ask your DMO, however, as there are official tools for registration and filing like Adonis or Ares, never forget that it is compulsory that at least registered documents are stored in the application where they were registered. The shared drive will therefore be just a working space, and should be considered a "working file". If you use the shared drive as working files, it is advisable to name the folders with the same codes of the official files, to copy the hierarchy of the file's headings and respect some principles such as not to copy documents under heading's folders, etc.

## **6.2. The importance of a file code:**

File codes are not just a metadata of the file. They are a way to identify easily and quickly one file. Lots of information can be put in this code, which will certainly facilitate the management of a file.

In a simple alphanumeric code you can give enough information to manage the file and to identify it. For instance, an information society program in the Czech Republic for the year 2009 can be represented as follows:

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<sup>15</sup> As an example, every case related to the Article 90 of the staff regulations is managed by a specific application; RecArt. The official list of files in DG ADMIN's Adonis contain all files of this issue, but the file in Adonis itself is empty. This metadata indicates that the documents are managed in the RecArt application.

2009/CZ.ISP. In any IT tool we will be able to look for all projects in the Czech republic by searching %CZ%, or every project from year 2009 to sort out those that must be closed, etc.

Each DG can freely choose their schema for file codes. Contact your DMO<sup>16</sup> in order to find your DG's template.

### **6.3. Creation of a sub-file:**

Sub-files are just a way to organise documents within a file. They help to find easily a particular document of the file, but the Chef de File decides freely if he or she wants to create them and on what basis. They can be steps of a procedure (first reading, negotiation, approval) they can be based on geographical criteria (Project X: Chad, Niger, Nigeria...) etc. There is no limit regarding the number of sub-files within a file. But a sub-file can never contain more sub-subfiles.

### **6.4. Serial files / action files / thematic files.**

Serial files are files that we repeat each period of time (normally on a yearly basis) and can be confused with a heading, as a "never ending" activity. A good example for this is the AMP. Each year there is an annual management plan. Each year we produce and exchange documents regarding the same questions. But they are actually files, and not a heading, as each year's AMP constitutes a case on its own. There are two common mistakes regarding serial files, mistakes that we must absolutely avoid: the first one is to consider them as a heading. The second one is to create a file called like the annual action, and create sub-files per year. In this case, the file will never be closed, as each year a new sub-file will be added.

Serial files exist mainly of administrative tasks, such as planning, evaluation (like the evaluation of ICS, for instance), but can be found also under some core business activities that we repeat year by year (for instance, in ECFIN every year they carry on an economic surveillance of Member States). Once they are identified, their management is easy, as every year will be the same. It is important not to forget to close the files for the year finished and open a new one for the coming year.

Action files are, for instance, a project file. They are a case on their own; it is easy to identify their beginning and their end. They represent an action that will not be repeated again (the construction of a hospital in Uganda, the development of an IT tool to deal with the flexitime, the organisation of a conference about AIDS...). They are easy to manage.

Thematic files appear normally from a misconception when creating a file. Their creation is based on a theme and not on an action. For instance, instead of "the construction of a hospital in Uganda" someone can create a file called

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<sup>16</sup> <http://www.cc.cec/home/dgserv/sg/i/edomec/index.cfm?lang=en&page=photosdmo>.



"health projects". This is really dangerous, for three reasons: First of all, a "thematic file" will never be closed (there will always be "health projects") secondly, the "theme" differs a lot from one person to another (the organisation of a conference about AIDS can be considered a "health project" for someone, and not for someone else) and thirdly, it will never give the context of a document (the payment of the construction of a hospital in Uganda will be together with a vaccination campaign in Mozambique...). Thematic files can be work files (for documentary purpose) but never official files.

## 6.5. Closure of a file

A file has to be closed when the case is over, and no more documents will be added to the file. In other words, the file will be closed when no more work will be done regarding this particular subject (or during a given period, for serial files). However, some punctual problems may make the file to be kept open, although the normal actions carried are finished. For instance, a file with financial implications must be kept opened if irregularities are suspected. It can be finally closed once when it is clear that the irregularity does not exist or when this irregularity is solved (before the court or not). If the file was created properly, the creator had in mind the moment of closing when creating it, so that the title gives an idea of when we can consider that the file is finished. As an example: "Development of an application for meeting rooms' management" won't have the same end as "Implementation of the meeting rooms' management application". The first will be finished once the application is done, even if it has not been installed. The second one, once the application is operative and installed.

*Closed file that leads to a new file:*

Sometimes a file can be closed and be the basis of a new file. This happens especially in the case of investigations of fraud, etc. The file of a project can be audited, and may lead to a fraud case. When this happens, the auditor does not re-open the project file<sup>17</sup>, but he/she opens a new file (to deal with the audit) where the closed project file documents is the basis of this investigation.

*One big file or two small files?*

Sometimes it is not clear if we should have a big file with several steps of a procedure or whether each step should consist actually of one file. A good example for this is the requests for access to documents. In this matter, the demanded DG examines the request to decide whether or not they give access to a document. This "case" is quite simple and will produce a relative small file that will be closed once a decision is taken. If the access is given, or if the requester does not contest a negative answer, no more actions are foreseen. However, if the requester decides to contest it, the transparency service of SG is responsible to deal with the matter. Two options are possible for the user: Do we open different files (one dealing with the requests in our DG and, in

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<sup>17</sup> The Common Retention list mention this as a "re use" of a file.

case of contestation SG will open their files) or the SG will take over the first file? The best option is to open a new file, as the case is not whether or not we give access to a document (first file), but to deal with a new matter (the contestation of the requester). There is not a real change of Chef de File, as the original file can be very well closed without the action of SG. This case is mixed with the case of change of Chef de File seen in chapter 5.1. In that example (a financial unit that takes over from an operational unit) the project file can not be closed if the file does not go through both units.

*Closing a yearly file:*

The fact of having files on a yearly basis does not mean that they have to be closed first of January next year. As an example, the AMP of year 2006 may be evaluated in June 2007. The AMP 2006 file will be closed once all tasks regarding this subject have been finished.

*Actions to be taken when a file is closed:*

When closing a file, the Chef de File should indicate its new status in the application containing the official file list of its service. It is advisable to verify if all pieces are there, and also to take out those pieces that are not very important for the file (obviously, they will never be registered documents.) In the case of paper files these can be post-its staff-charts, etc. In the case of electronic files, drafts that have never been approved, etc. Before doing this, contact your DMO to know the procedure in your DG and look at the Retention list of to see what actions are to be done once the file is closed.

*Closing a subfile when the file is still open:*

As we have seen, a sub-file is just a way to group documents within a file. Therefore, you only real "closure" of a file must be done at the file level itself. Closing a subfile does not mean that the file has to be closed. It is just a way of indicating that the work on an aspect of the case was finished.

## **6.6. File list.**

The Internal Control Standard 13 says that "Each DG shall systematically register incoming and outgoing mail to enable efficient monitoring of deadlines and maintain a comprehensive and up to date filing system which is accessible to all appropriate staff."

The official filing system of the Commission is the Common Filing Plan, composed of a hierarchical structure of headings (reflecting the activities, the "missions" of the Commission) and files (reflecting the "actions", the cases undertaken to fulfil those missions) attached to the lowest level of headings (see definition in chapter 2.5)

The setting up of the heading structure is the responsibility of the DMO in each DG. But as we have seen in chapter 5, each file is under the responsibility of a Unit, which is "Chef de File" for that file. Therefore, each unit should create the list of files for which it is responsible. This list will help us to:

- Identify clearly the actions for which we are responsible
- Identify who in our service is carrying out this action
- Indicate if the file exist in paper or in electronic format or is a mixture of both
- Facilitate the transfer to the Historical Archives
- Identify the eventual needs for space
- Comply with the regulations in force<sup>18</sup>

According to the Commission's regulations, "Registered" documents "shall be organized in files" and those "files shall be listed" on paper or electronically.

The Adonis tool allows us to have this list electronically, and at the moment of writing this manual, it is the only electronic tool that links each file to its correspondent heading. In the future, Ares as any other tool adapted to the Hermes platform<sup>19</sup>, will contain also the list of official files linked to its heading.

This file list must contain only the official files for which we are "Chef de File", not any working file. To distinguish working files from official files, see next chapter. (6.7)

## **6.7. Official file vs. working file**

As we have seen, an official file represents the work done by the Institution in order to solve a case, a problem, a matter presented to it. For each case, there must be one and only one official file, containing, at least, all registered documents related to this case. (We have seen that the official file can contain also non registered documents with an informative value, etc.). For this official file, an obligation of physical preservation exists.

Any other file, made up only of working information is considered a working file. Working files are typically files kept in our cabinets, our desk, just for consultation, information etc. Examples of these working files are collections of legislation, copies of the official file, information about a country, a subject, etc. There is no obligation of physical preservation for such files. To make the difference, I could ask myself whether the loss of the file involves a risk for the institution, or whether there are registered documents in it. If the answer is yes, that file is an official file. In other words, if the file is created in Adonis (or any other official tool of the Commission) and linked to a heading of the Filing plan, it is an Official File.

Again, we should insist here on the difference between filing and storing. Some DGs and services keep all registered originals paper documents stored

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<sup>18</sup> Commission Decision 2002/47 article 5 and of Internal Control Standard number 13 (to be consulted on <http://www.cc.cec/home/dgserv/sg/i/edomec/index.cfm?lang=en&page=contexte>).

<sup>19</sup> For more information about Hermes visit this link on the e-Domec web site on Intracomm: [http://www.cc.cec/home/dgserv/sg/i/edomec/pages/hermes/index\\_en.htm](http://www.cc.cec/home/dgserv/sg/i/edomec/pages/hermes/index_en.htm).

chronologically. However, as far as those documents have been filed, and through the file code (in Adonis, for instance) they can be put back together in the file when requested. In this case, the file exists virtually through Adonis, and not physically. In this case, Services keep copies of the documents, in a working file.

In decentralised services, the originals are kept in the unit, stored together in a binder. The service Chef de File is responsible for its preservation, at least as long as the file is open<sup>20</sup>. Any copies of it would be considered, as copies of any other document or file, working files. They don't need to be preserved. The only interest for its preservation is the interest of the official, the need for information he/she has.

Working files shouldn't be listed in the list of official files of a service, they shouldn't be attached to a heading of the filing plan, and they are not part of the retention schedule. They are just working tools.

## **6.8. Personal and human resources files in units and DGs**

Every unit keeps normally a set of personal files, to manage human resources questions regarding the unit staff. However, there is only one personal file per official, kept in DG ADMIN. In addition, every DG has a Human Resources unit that keeps the files defining the Human Resources policy and other actions of the DG.

So the files kept at unit level must be considered as "[Working files](#)" (units are not really "Chef de File" of those subjects). The problem is that in many cases, the decentralised structure of a DG or the customisation of registration and filing tools forces some units to keep registered documents in personal files at unit level. If this is the case, we can consider that those files can be destroyed regularly according to an administrative procedure as they are just the contributions from the unit to the personal file of an official, or to larger human resources files (To the DG or to ADMIN's files). The procedures in place and the tools must change in the DGs where the units keep human resources files, so that all documentation is filed together in one single file.

## **6.9. Mixed files. Electronic and paper files and files in several applications.**

*6.9.1. A mixed file is a file where the nature of its documents is both paper and electronic*

At this moment, when the electronic world is becoming more and more important, but where the paper still plays an important role, it is very strange not to have a mixed file. Some documents exist on paper version and some documents are purely electronic.

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<sup>20</sup> Depending on the service or DG, closed files are kept in units or transferred to an intermediate archive. The responsibility for preservation can therefore remain with the unit Chef de File or transferred with the file. Ask your DMO for the practice in your service.

For the intellectual operation of "filing" this does not constitute a problem, as the attribution of a file code to a document can be done in Ares, Adonis, or whatever application regardless of the nature of the document.

The problem comes with the second step of the filing, the storage of the document. As we have seen, the places to store documents are different if it is a paper document, which would be placed in a binder, than if it is an electronic document, which can be stored in Adonis or Ares.

When this happens, there is an easy solution to put in place: The list of official files exists in Adonis. So in the Adonis "fiche" of a file, we can add a piece of information indicating that there are paper documents in a binder. The file "fiche" allows the introduction of data which leads to the localisation of that binder: the person responsible for the file or even the location of the binder can be introduced. A line in the "comments" field should be added, with a phrase like "paper documents in the correspondent binder"

#### *6.9.2. Can scanned documents be considered as valid electronic versions of documents?*

A possible solution is to scan all paper documents in order to attach them to the registration fiche, and have a full electronic version of the file. This practice is really advisable, as it allows any authorised user to access the whole information of a given file easily. Paper originals can be destroyed according to certain conditions, detailed in the Implementing Rules on Electronic and Digitised Documents. Otherwise, if those conditions are not fulfilled, the paper original has to be kept.

The Implementing Rules on Electronic and Digitised Documents set the conditions where a scanned document can be considered having the same value as the original. Those conditions are (basically) that the document is stocked in a special repository, and that, if the document need a signature for its validity (case of contracts, for instance) the document is electronically signed with an advanced electronic signature.

The Commission will dispose of that technology once the Hermes platform arrives, with the new registration tool replacing Adonis: Ares. So, once this tool arrives, scanned documents will be considered having the same value as the original documents. But till this time arrives, most of the files will be mixed electronic and paper files.

#### *6.9.3. What if a file contains documents registered in several applications?*

This is another way of having a mixed file, not because of the nature of the documents, but due to the fact that documents are registered in different applications, and therefore also stored in the application where they were registered. This can happen with e-Domec specific registers: Abac, Sybil, Cisnet, etc. These applications do not contain files linked to a Nomcom heading and pose problems to fulfil the obligation of filing. All the files related to the documents registered in other applications are listed in Adonis. The complete file should also contain documents registered in these other applications.

Thus, it is recommended to indicate in the Adonis file that some documents of the file are registered and stored in other application, which application it is, and how the documents can be found (through which reference numbers, etc.) There are two ways of doing this: indicate all information in the "commentaires" field of the Adonis file fiche, or create a word document with all references and file it in Adonis through the repertory function<sup>21</sup>.

## **7. CREATION AND MANAGEMENT OF HEADINGS. FILING PLAN MANAGEMENT**

As seen in the definitions, a filing plan is a set of headings organised hierarchically which reflect the activities of the institution. In each DG, the DMO is responsible for the maintenance of this filing plan, and it will be his/her role to modify headings or create new ones when needed. However, Units and services dealing with their cases (files) on a daily basis could understand the need of a new heading (if a new activity is added, a new policy has to be developed, etc) and should contact the DMO for this.

### **7.1. Heading vs. File. Differences**

One of the most common mistakes is to consider a file as a heading. To have clearly in mind the difference we must know that a file is a set of documents concerning one single case, organised in a coherent way. It justifies, proves and informs about the work done regarding this case and guarantees the continuity of the service. As any case, it has a beginning (when we start to deal with a problem) and an end (when we have found a solution for that problem). It reflects an ACTION.

A heading is one of the branches of the filing plan. It groups files (actions) and reflects an activity. The activities are the "missions" of the Commission services, they have not a foreseen end.

## **8. QUESTIONS AND ANSWERS.**

### **8.1. Who has to file:**

The Chef de File of a given matter is responsible for the completeness of the file. He/She has the last responsibility regarding filing, although the operation (indicating the file code in Adonis, for instance) can be done by someone else.

### **8.2. What do I have to file**

We must file all registered documents. We can file non registered documents if they help to the understanding of the file.

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<sup>21</sup> The fact of using the repertory function is because the document does not constitute an official document itself, but it is added just with a practical informative value.

### **8.3. I receive a document for information. Do I have to file it?**

If the document is sent only for information, it must not be registered and therefore I don't have to file it. It can be done, however, if the document has an informative value for the correct understanding of the file.

### **8.4. I receive a document that is not for me? What do I do?**

If the document is addressed to me by mistake, I should forward it to the right service. They, as Chef de File, will be able to take the decision whether the document must be registered or not<sup>22</sup>, and where it must be filed.

### **8.5. My paper file is full. Do I need to create a new file?**

No. A file is a case, not a binder. One thing is the action of filing (to attribute a document to its case, to its file. It is an intellectual action), another thing is to store the document in a safe place (a binder for paper documents). A single case (a file) can have hundreds of binders containing their paper documents.

### **8.6. When can I open a new file?**

I must open a new file always when I have to deal with a case for which a file is not created yet. Pay special attention to files (and cases) where the Chef de File has changed, or where the work is done by different services. The file may exist, even in other service. Don't create a duplicated file for the same case.

### **8.7. When can I close a file?**

A file must be closed when the case is finished. It is advisable to wait a while before closing the file in order to be sure that the file can be really closed. For serial files, the closing moment is when we know no documents from the file's period of time will arrive. (AMP 2007 can still receive documents in the first months of 2008)

### **8.8. What is a sub-file?**

A sub-file is a way to organise documents within a file. There is no obligation to create sub-files, and there is no limit in the number of sub-files that a file can have. They can be created at any moment.

### **8.9. What's the difference between heading and file?**

A heading is a part of the filing plan and it represents an activity, a mission of the institution. They are supposed to stay stable a long time. A file is a particular action carried out in the framework of that activity: a case. They must have a beginning and an end.

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<sup>22</sup> If the structure of the DG is centralised, the document may have been registered already by the CAD. In this case, the registration can always be cancelled.

**8.10. How do we manage never ending files, like sick leaves?**

Files must have an end. But some tasks of every administration are just repetitive. To avoid files without an end, an "artificial" end can be created. It is the case of the serial files. They must be closed on a yearly basis, and be managed as any other file.

**8.11. What is most important when giving a name to a file? The subject, the action, the kind of documents...?**

A file represents an action, so the better idea, is to give a name related to this particular action. This name will help us to easily file documents in the right file (a subject is always more general than a particular action) and must also help us to know when the file must be closed. For example, "Filing training in DGX" is not a suitable name. We don't know exactly when to start and close it, what exactly will contain the file, etc. But "Organisation and delivery of filing training sessions for Desk officers in 2008" helps better to identify and manage the file.

**8.12. Can I have non registered documents in a file?**

Yes. If those documents help to the better understanding of the file, it is a good idea to file them, even if we are not responsible for them at all (and therefore, they are not registered.) As we saw, a file shows the "story" of a case. Any relevant added information is always welcome.

**8.13. Do I have to print the e-mails to store them in a paper file?**

You don't have to. If a mail is registered, we normally put the file code in Adonis, Ares or whatever system (This way the e-mail is already filed) When I attached it, the e-mail will be stored in the electronic file. If the majority of the documents in a file are in paper version, I CAN print it and store it within the paper file, in order to have easily a complete file in one (paper) version. Although it is not necessary, the desk officer may consider useful to print a copy of the e-mail and store it with the paper file.