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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.

# **DOCUMENT REGISTRATION MANUAL**

Version 1.0

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## 1. INTRODUCTION

Document management in the European Commission is currently undergoing a number of important changes, following new legislation<sup>1</sup> adopted over the last few years. As directed by this legislation, implementing rules on respectively document registration and filing<sup>2</sup> have been adopted by the Secretary-General in agreement with the Director-General for Personnel and Administration.

Document management is part of our daily work and concerns just about everyone in the Commission. This manual should therefore be easily understandable also by non-document management professionals. Reading this manual will not replace reading the documents on which it is based (particularly not for legal or normative interpretation) but it should be a one-stop information source for anyone wishing or needing to understand the registration aspects of document management in the Commission. Furthermore, the manual is not intended only to compile and present information from the documents on which it's based, but to present an interpretation of this information and, where needed, provide completing rules and definitions.

Thus the manual aims to explain how to understand, interpret, and in general terms put into practice the implementing rules for document registration. However, it is not a step-by-step handbook for any specific registration software or system (e.g. Adonis). This must be provided by other documents. Also, it will not touch upon questions of filing, nor of archival storage and transfer.

In other words, the aim is to consolidate and explain, simply and comprehensively, the implementing rules on registration as well as underlying or related legislation, and to make clear the general rules which must be respected by any document registration or management system, and by anyone registering documents in such systems.

As part of these general rules, the manual will also lay down rules and syntax concerning the encoding of essential descriptive data (metadata).

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<sup>1</sup> See the list of source documents in chapter 10.

<sup>2</sup> See chapter 10, points (1) and (2).

## 2. FORMAT

This manual is mainly based on a question-and-answer format. Where necessary, answers will be illustrated by giving concrete and realistic examples.

Sufficient references will be given for anyone who needs or wishes to find or consult the corresponding parts of the source documents. To avoid burdening the text, such references will, to the extent possible, be given in footnotes. The full titles of the source documents are listed in chapter 10, together with a brief description of how these documents are interrelated.

Finally, many of the source documents on document management use the term *institutions*<sup>3</sup>. For the sake of simplicity this manual will most of the time replace *institutions* with *Commission*. Further, unless clearly stated otherwise, *Commission* will be used in the broad sense of the word to signify not only the college of commissioners but also the entire organisation or, depending on circumstances, parts of it.

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<sup>3</sup> In the context of regulation (EC) 1049/2001 *institutions* means the European Parliament, the Council and the Commission.

### 3. BASIC DEFINITIONS

#### 3.1. Document

##### 3.1.1. What is a document?<sup>4</sup>

For the purposes of this manual, a document is **any content** independent of medium<sup>5</sup>, which concerns the **policies, activities** and **decisions** of the Commission.

In other words, it does not matter if it is text written on paper or in an e-mail, sound registered on a tape, or pictures stored in an electronic format on a CD-ROM. No matter what type of information, what format, what physical support, as long as it concerns the work of the Commission *it is a document*.

For more details, see 8.1.1, 8.1.2 and 8.1.3.

##### 3.1.2. When is a document considered formally drawn up?<sup>6</sup>

A document is considered **formally drawn up** when it has been *approved as ready* by the *author* and is ready for *formal transmission*.

For more details, see 8.1.4.

##### 3.1.3. When is a document considered received?<sup>7</sup>

A document is considered **received** when it is *available* to the service(s) for which it is intended.

**Available** means that the document has *arrived* at the *premises* of the service, or has been *handed* to an *official competent to deal with the document*, or has been made intentionally available to the service through an information system.

**Tenders**, or similar documents, sent under sealed cover to be opened at a certain date and hour obviously cannot be registered until this date and hour has arrived and

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<sup>4</sup> Provisions on document management, annexed to the Rules of procedure of the Commission by Commission Decision No 2002/47/EC, articles 1 and 4.

<sup>5</sup> Regulation (EC) No 1049/2001, article 3. The following media are explicitly mentioned: written on paper; stored in electronic form; sound, visual or audio-visual recording.

<sup>6</sup> The text of this point is not based on any source document.

<sup>7</sup> The text of this point is not based on any source document.

they have been opened. After opening they are considered received on the date of the postmark.

For more details, see 8.1.7.

## 4. BASIC PRINCIPLES OF DOCUMENT REGISTRATION

### 4.1. Purpose

#### 4.1.1. Why register?<sup>8</sup>

There are several reasons why Commission documents have to be registered. Broadly speaking, they fall into three categories.

- (1) A very important purpose of document registration in the Commission is to **certify transmission** with due regard to established forms and procedures.

This means certifying that a document has been *sent* at a given date from an author to a recipient, or *received* at a given date by a recipient. Often, the recipient is a person or an organisational entity (or both).

A document that is not sent to a person or organisation is nevertheless considered transmitted when it is *incorporated into an archiving/information system* (see 8.1.4).

No matter what form transmission takes, registration must also *certify* that a document *fulfils certain conditions* concerning *form* (see 4.1.2) and has been presented for registration according to *established procedures* (see 4.1.3).

Also, registration must ensure that a document received or formally drawn up is *integrated in the Commission's document management system*.

- (2) Registration must also fulfil certain internal needs for efficient **document management**.

One such need (equally important to certifying transmission) is the ability to *identify* with certainty a document formally drawn up or received by the Commission.

A second need is to guarantee that such a document can be *traced* throughout its life cycle, that is to say from the moment it was received or formally drawn up, through its time of active use and intermediate storage until it is either eliminated or permanently stored.

A third need is to *attribute* a document for action, follow-up, information or storage. This links registration of a document to its workflow processing.

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<sup>8</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, point IV; Provisions on document management, annexed to the Rules of procedure of the Commission by Commission Decision No 2002/47/EC, article 4; Regulation (EC) No 1049/2001, article 11.



- (3) Finally, the Commission has a legal obligation to make citizens' rights under regulation 1049/2001 effective by providing **public access** to a register of documents (see 4.2.7).

#### 4.1.2. Which are the "minimum requirements" regarding form?

One purpose of registration is to *certify* that a document fulfils established or generally recognised minimum requirements regarding *form*.<sup>9</sup>

The **form** expected of a document depends on the kind of document, on the identity of author and recipient, on its content and the context in which it is sent, etc.

For example, one would expect a formal communication from the Council to the Commission to be highly formalised, on the proper letterhead, containing certain set phrases, properly signed and perhaps carrying certain stamps. If some or all of these elements are missing or seem wrong, there would be reason to suspect that the document is not what it purports to be.

At the other end of the *form* scale, a letter from a child writing to the Commission as part of a school project could take just about any form. It might be handwritten, perhaps with coloured pencils, on any kind of paper, being incompletely or incorrectly addressed, etc., but it might also be neatly laser printed on good quality paper, or come as an e-mail from a Hotmail address, or have yet some other form. Unless the content was to cause concern, all these forms would be perfectly acceptable for such a letter, and there would be no reason to think that the document was not what it claimed to be.

Of course, registration of a document is in itself no absolute guarantee that the document really is what it claims to be and has been registered as. Thus the responsibility for accepting a document and its content must always rest with the service handling the matter concerned, and not with the registration department.

Anonymous letters are a particular *form* of documents, in the sense that their author being unknown is what makes them what they are and is to be expected. Thus the fact that a communication is anonymous does not in itself make it exempt to registration. An anonymous letter might perhaps be more likely than a signed one to be exempt from registration because it does not involve the responsibility of the Commission, or because it is unimportant. It is nevertheless subject to the same rules of registration and must be analysed in the same way as any other document.

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<sup>9</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, Chapter IV, article 1(b).

*4.1.3. When is a document presented for registration “in accordance with an established or generally recognised procedure”?*

This question is not as complicated as it might seem. For example, within a given DG incoming letters are usually treated in a systematic manner; that is to say according to an established procedure. This procedure lays down by whom they will be opened, who will decide whether or not a letter must be registered, who will do the registration, who will decide on attribution, etc.

Similarly, there may be a rule in a DG or service telling officials how to act if receiving an e-mail that should be registered, or there may be a procedure for how a document should be presented for registration after having been circulated for approval(s) and signature(s).

Such procedures can be very strict or quite loose; they can be written down in full detail or just be generally known by staff (“here in DG X we always do it like this”).

## 4.2. Registration and listing in an inventory

### 4.2.1. Which documents must be registered?<sup>10</sup>

There are **two different sets of conditions** for deciding whether or not a document has to be registered. If *either set of conditions is fulfilled*, the document concerned *must* be registered.

- (1) The **first set of conditions** is a combination of *three criteria*, all of which must be fulfilled, and concerns both drawn up and received documents.

The **first criterion** is that the document must have been formally drawn up or received in the course of Commission activities. For a definition of when a document has been formally drawn up or received, see 8.1.4 and 8.1.7 respectively.

The **second criterion** is that the document must *either* be likely to require action, follow-up or a reply, *or* involve the responsibility of the Commission.

The **third criterion** is that the document must contain important information that is not short-lived. Some examples:

- (a) Information is considered unimportant and short-lived if its loss would have no negative effect for the Commission's administrative or legal needs.
- (b) Information is considered unimportant and short-lived if it has a clearly temporary value that will soon vanish, or a purely ancillary or instrumental value.

A document may also be unimportant and short-lived if it is considered or treated as such in a records schedule or a procedural regulation, or by a routine administrative practice.

For a detailed discussion of when a document is considered important and not short-lived, see 8.1.8.

- (2) The **second set** of conditions only concerns drawn up documents, which must be registered if they are drawn up as *effective* administrative or legal *evidence* of decisions, situations, intentions, or events linked to the activities of the Commission.

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<sup>10</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, chapter V.

**Effective evidence** means that the document is able to produce the intended effect on the recipient, who must therefore be able to consider the document as credible.

#### 4.2.2. Which documents may be listed in an inventory?<sup>11</sup>

Any document, which does not have to be registered, may be listed in an inventory.

A document can *only ever* be considered for listing if it clearly falls outside the conditions for registration described under point 4.2.1. As a general rule, such a document should be listed if this action is considered useful to help identify and keep track of the document.

A document may very well be listed at an initial stage of its life cycle and later registered as well. For example, it could be that a document is not yet formally drawn up because it has not yet been formally approved and made ready for formal transmission (see 8.1.4). As the document is not yet formally drawn up, there is no obligation to register it. Nevertheless, the practical work of drafting/typing the document has been finished, and the unit in charge of drafting thinks it would be useful to list the document as a help to keep track of it while waiting for approval and transmission to take place. Particularly, in certain applications (for example Adonis 5.2) listing a document will make it possible to use such workflow functions (see 4.3) as attribution and circulation lists. For recommendations on how to use respectively the inventory and registration numbers, see 5.2.

Once approval has taken place and the document is ready for transmission, it is formally drawn up, and must be registered, provided that it also fulfils the other conditions (see 4.2.1) for being registered.

Thus a document may well be first listed and later registered by the same registration department<sup>12</sup>. The inverse, however, is not recommended. A document that has already been registered should not be listed afterwards by the same registration service.

In practice, an inventory can be a separate tool or it can be a module of, or otherwise included in a tool used to register documents. Whatever the technical/practical set-up, it should be possible to re-use for registration any descriptive data (for example author, title, date, etc.) created and saved when the document was listed.

Even though a document qualifies for being listed, there is no obligation to do so. Nevertheless, each DG/service (or directorate or unit, depending on document

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<sup>11</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, footnote 7; chapters III and VI.

<sup>12</sup> By *registration department* is meant everyone within a DG/service responsible for carrying out registration. This may be done in a manner either centralised or decentralised, or a combination of both, depending on organisation within the DG/service.

management organisation within the DG/service) is free to set up such rules, as strict and detailed (or not!) as they see fit, for various types of documents that may be listed.

**4.2.3. *Can a document be registered or listed more than once?***

No, and yes.

A document should, of course, not be registered more often than necessary. In particular it should not be registered in the general register if the same transmission has already been registered in a specific register or vice versa (see 8.4).<sup>13</sup>

However, one of the main purposes of registration is to certify transmission, which is to say that a document has been sent or received at a certain date (see 4.1.1). Thus in the case of a document that is sent from, for example, one DG to another, there are two instances of transmission to be certified: the sending of the document, and its reception. The document must therefore be registered twice, once by the sender and once by the receiver. In principle, the document could have to be registered (or listed, if it does not meet the conditions for registration) any number of times, depending on the number of transmissions and recipients.

**4.2.4. *Are there documents that do not have to be registered?*<sup>14</sup>**

Yes.

Obviously, if a document does not fulfil the conditions for registration (see 4.2.1) it does not have to be registered. But there are other categories of documents that do not have to be registered.

A document is exempt from the procedure of registration if another procedure guarantees an equivalent result (particularly concerning identification), or if the administrative rules and practices of a DG/service do not require registration as a formalised record of transmission. The following gives some examples.

- (1) Documents such as the COM, SEC, and C series, distributed in a number of copies to Commission departments, do not have to be registered by the recipients, since these documents are identified and monitored by a well established procedure.
- (2) Documents such as those treated by the SIC and SYSPER2 applications do not have to be registered, since these systems guarantee that the documents

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<sup>13</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, article V.

<sup>14</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, articles VI and VII.

are processed and stored in a methodical manner and under a reliable procedure.

- (3) Documents such as briefings or e-mails exchanged for advice or commentary between Commission departments do not have to be registered when the exchange is made informally and in agreement of good faith.

#### 4.2.5. *When does a document have to be registered?*

A document must be registered *as soon as possible* after being formally drawn up or received.

Under normal circumstances, “**as soon as possible**” means the same day, or (if a document is received or drawn up very late in the day) the following working day at the latest.

#### 4.2.6. *Are there documents exchanged within a department that must be registered?*

Yes.

When both author and recipient are in the same department (DG/service or directorate) the rules are exactly the same as when they are in different DGs.

However, documents sent within the Commission do not have to be registered if they fall under the exception of being exchanged informally and in good faith, for advice or commentary. This is true for documents exchanged between DGs, and perhaps even more likely to be true for documents exchanged within the same department.

#### 4.2.7. *Why is registration important for public access to documents?*

The Commission has a legal obligation to make citizens’ rights under regulation 1049/2001 effective by providing public access to a register of documents.

*The rights of citizens* under regulation 1049/2001 do not include an unlimited right of access to Commission documents. Although in principle all Commission documents should be accessible, certain public and private interests are protected by exceptions.

Citizens do, however, have the absolute right of *demanding* access to a document (even if this document falls under the protection of an exception) and to have this demand tried. In other words, every time someone demands access to a document, the request and the document will have to be analysed anew, taking into consideration *who* wants to see *what*, and whether or not this request can be granted under the exception rules in force.

This is where registration comes in. If you do not know that a document exists, you cannot demand access to it, and therefore you cannot have your demand tried under the rules in force. Although citizens will not necessarily have direct access to the registers (Adonis, etc.) with which the Commission works on daily basis, these registers will feed the public register (see 8.4.2).

#### 4.3. What is the difference between registration and document workflow?

**Registration** of a document is a mandatory formal act, certifying that a document has been transmitted from an author to a recipient and integrated into the Commission's document management system. Registration must also facilitate the identification and tracing of a document, throughout its lifecycle (see 4.1.1).

**Workflow**, on the other hand, is everything that has to do with practical, day-to-day handling of a document. It includes such elements of who-does-what as attribution for handling, task allocation, circulation for information, approval or signature, and much more.

Workflow is, of course, a very important aspect of document management, but the *practical* act of producing or dealing with a document (and its attaining business) must never be confused with the *formal* act of registration. This is particularly important as several registration tools (not least Adonis) contain functions for both registration and workflow.

#### 4.4. What is the difference between registration and document storage?

**Registration** of a document is a mandatory formal act, certifying that a document has been transmitted from an author to a recipient and integrated into the Commission's document management system. Registration must also facilitate the identification and tracing of a document, throughout its lifecycle (see 4.1.1).

**Document storage**, on the other hand, is everything that has to do with the physical storage of documents. Although several registration tools (not least Adonis) contain functions for both registration and (electronic) storage for documents, the *practical function* of accessing the documents itself (or an electronic copy) must not be confused with the *formal act* of registration, even if the same application is used in both cases.

## 5. REGISTRATION IN PRACTICE

### 5.1. Which are the practical operations of registration?<sup>15</sup>

Registration consists of two distinct operations: *saving essential descriptive data*, and *permanently associating the document with the data describing it*. Both operations must be carried out in the presence of the original<sup>16</sup> document.

To **save essential descriptive data**<sup>17</sup> means making sure that all information needed to properly describe the document from an administrative, legal, and archival point of view has been entered into the system used for registration, and saved there.

To **permanently associate the document with the data describing it** means that the document is connected to the descriptive data in a way that is permanent and cannot be changed, and which allows the document to be unequivocally identified. The most common way of doing this is by affixing (by writing, stamping, or some other method) a registration number (and often other information, such as the date or the service involved) to the document itself.

### 5.2. If a document is both listed and registered, which number should it bear?

If a drawn up document has been listed during the preparatory stage in order to facilitate workflow (attribution and/or circulation), and then after approval also registered, it will have two numbers: one *inventory number* and one *registration number*. The following is a recommendation on the practical use of these two numbers.

The **inventory number** should not be written on the master document that is to be approved, signed, and sent out, as this is likely to cause confusion with the registration number. The inventory number might, however, be mentioned on accompanying documents such as a circulation slip or briefing note. In the absence of such accompanying documents, the inventory number could also if necessary be pencilled lightly on the master document, and erased after registration.

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<sup>15</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, article VIII.

<sup>16</sup> The original document containing all the information as transmitted by the sender to the addressee [...], in so far as the parties involved confer on the document concerned the status of original by mutual consent, by tacit agreement or under a well established procedure. *Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, article III.*

<sup>17</sup> For a definition of essential descriptive data, see 8.2.2.



The **registration number** should be the one written on the outgoing copy of the master document. Given that registration can only take place after approval and signature, it will usually be necessary to affix the registration number to an outgoing document by hand or by using a numbering stamp.

Once the Nomcom system is in place, the master document may also carry a reference to the *official code*<sup>18</sup> of the file to which the document belongs.

### 5.3. Step-by-step analysis of a document

It is difficult to draw up a definite list or typology of documents with clear and unambiguous rules for what must be registered and what not. As this manual hopefully makes clear, the question whether or not to register a given document can only be answered by analysing it in context.

Analysing a document should not mean turning it over and over for hours on end, scrutinising every last detail. On the contrary, in most cases a brief study, or even a cursory glance, is sufficient to arrive at a conclusion. This is particularly true as experience of registration, and of the types of document usually dealt with, is built up in a registration service.

In order to help build up such experience, and for use in less clear-cut cases (which will unavoidably present themselves), the following schemes aims to give step-by-step guides to analysing documents, giving the sequence of questions to be posed and the consequences or actions that follow from the answers to them.

When analysing a document the sequence of questions does not have to be followed in entirety or in any strict order. If, for example, the sticky point concerns just certain aspects of a document, one could use only the part or parts of the sequence necessary to resolve the issue.

For more detailed discussions of the issues on which this document analysis is based, see 8.1.1 (definition of *a document*), 8.1.4 (definition of *formally drawn up*), 8.1.7 (definition of *received*), 4.2.1 (*documents to be registered*), and 4.2.4 (*documents that do not have to be registered*).

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<sup>18</sup> The official code of a file has the format YYYY-LLNNNN where YYYY is the year in which the file was created, L are letters and N are numbers, for example 2004-AA1234 or 2006-ZX6583. *Note à l'attention des membres du Groupe de liaison DMO – IRM, Objet : Code dossier dans NomCom, 2003 SG.G.3/es D(2003) 31410, 15.12.2003.*

5.3.1. *Analysis of a drawn up document*

(1) *Is the document formally drawn up?*

A document is considered formally drawn up when it has been approved as ready by the author and is ready for formal transmission.

This is checked against the following:

(a) *Is the document approved as ready by the author?*

The author is the person or organisational entity formally responsible for the content of the document. The document is approved as ready *either* by an act of approbation (for example a signature, or adoption by a meeting) *or* by *de facto* treating it as ready (for example by sending it to someone, or by making it available via a website).

**Is the document ready in the sense of the one responsible saying it is, by signing it, sending it, or by a similar act of formal or *de facto* approbation?**

If **yes**, the document is approved as ready, and should be checked against the other points.

If **no**, the document is not approved as ready, is therefore not yet formally drawn up, and does not have to be registered.

(b) *Is the document ready for formal transmission?*

Transmission means sending the document from the author to a recipient. The recipient can be a person, an organisational entity, or an archiving/information system. Transmission to a person or an organisation is formal when the recipient is the one for whom the document is ultimately intended. Transmission to an archiving/information system (for example a note to the file) is formal when the document is incorporated into the system.

**Is the document ready *either* for transmission to the recipient for whom it is ultimately intended, *or* to be incorporated into an archival/information system?**

If **yes**, the document is ready for formal transmission, and should be checked against the other points.

If **no**, the document is not ready for formal transmission, is therefore not yet formally drawn up, and does not have to be registered.

(2) *Does the document involve the responsibility of the Commission*

This is checked against the following:

**Does the matter of the document relate to the policies, activities or decisions of the Commission or one or more of its departments?**

If **yes**, the document does involve the responsibility of the Commission, and should be checked against the other points.

If **no**, the document does not involve the responsibility of the Commission, and does not have to be registered.

(3) *Is the information contained in the document important and not short-lived?*

For a document to be considered for registration, it must contain important information that is not short-lived. Information is unimportant and short-lived if losing it would have no negative effects for the Commission's administrative or legal needs, or if its value is clearly temporary and will soon vanish, or if it is just ancillary or instrumental. For a more detailed discussion of this issue, see 8.1.8.

This is checked against the following points:

(a) *Is the information in the document important?*

**Would the loss of the information in the document have a negative effect for the Commission's administrative or legal needs?**

If **yes**, the document is important and not short-lived, and should be checked against the other points.

If **no**, the document is unimportant and short-lived, and does not have to be registered.

(b) *Is the information in the document not short-lived?*

**Does the information have more than a clearly temporary value that will soon vanish?**

If **yes**, the document is important and not short-lived, and should be checked against the other points.

If **no**, the document is unimportant and short-lived, and does not have to be registered.

5.3.2. *Analysis of a received document*

(1) *Is the document received?*

A document is considered received when it is available to the service(s) for which it is intended.

This is checked against the following:

(a) *Is the document available to the service?*

Available means that the document has arrived at the premises of the service, *or* has been handed to an official competent to deal with the document, *or* has intentionally been made available to the service through an information system. An official competent to deal with the document is either an official involved in the handling of the matter to which the document is related, or an official charged with the task of receiving or treating incoming documents.

**Has the document arrived at the premises of the service, *or* been handed to an official competent to deal with it, *or* been made available through an information system?**

If **yes**, the document is received, and should be checked against the other points.

If **no**, the document is not received, and does not have to be registered.

(2) *Is the document likely to require action, follow-up or a reply, or does it involve the responsibility of the Commission?*

This is checked against the following:

**Is the document likely to require action, follow-up or a reply, or does the matter of the document relate to the policies, activities or decisions of the Commission or one or more of its departments?**

If **yes**, the document should be checked against the other points.

If **no**, the document does not have to be registered.

(3) *Is the information contained in the document important and not short-lived?*

For a document to be considered for registration, it must contain important information that is not short-lived. Information is unimportant and short-lived if losing it would have no negative effects for the Commission's administrative or legal needs, or if its value is clearly temporary and will soon vanish, or if it is just ancillary or instrumental. For a more detailed discussion of this issue, see 8.1.8.

This is checked against the following:

(a) *Is the information in the document important?*

**Would the loss of the information in the document have a negative effect for the Commission’s administrative or legal needs?**

If **yes**, the document is important and not short-lived, and should be checked against the other points.

If **no**, the document is unimportant and short-lived, and does not have to be registered.

(b) *Is the information in the document not short-lived?*

**Does the information have more than a clearly temporary value that will soon vanish?**

If **yes**, the document is important and not short-lived, and should be checked against the other points.

If **no**, the document is unimportant and short-lived, and does not have to be registered.

**5.3.3. *Analysis to check if a document falls under the exceptions to registration***

Not all documents have to be registered. Obviously, if the answer is “no” to one of the questions listed under 5.3.1 and 5.3.2 there is no longer any obligation to register. However, there are also some exceptions to this obligation. In other words, even though one answers “yes” to all questions under 5.3.1 or 5.3.2 a document may still be exempt from registration.

This is checked against the following:

(1) *Is there another procedure in place that guarantees a result equivalent to registration?*

A document is exempt from registration if another procedure guarantees an equivalent result (particularly concerning identification), or if the administrative rules and practices of a DG/service do not require registration as a formalised record of transmission.

Documents such as the COM, SEC, and C series, distributed in a number of copies to Commission departments, do not have to be registered by the recipients, since these documents are identified and monitored by a well established procedure. Likewise systems such as the SIC and SYSPER2 applications guarantee that the documents treated by them are processed and stored in a methodical manner and under a reliable procedure.

Lists of types and categories of documents handled under rules and procedures equivalent to registration shall be kept up to date in records schedules and manuals of procedure of DGs and services.

**Is there another procedure in place, for which a records schedule or a manual of procedure clearly states that it guarantees a result equivalent to registration?**

If **yes**, the document falls under an exception to registration, and does not have to be registered.

- (2) *Do the administrative rules and practices of the DG/service lack the requirement of registration as a formalised record of transmission.*

Documents such as briefings or e-mails exchanged for advice or commentary between Commission departments do not have to be registered when the exchange is made informally and in agreement of good faith.

**Is the document exchanged between Commission departments informally and in agreement of good faith?**

If **yes**, the document falls under an exception to registration, and does not have to be registered.

- (3) *Is the information considered or treated as unimportant and short-lived?*

The decision to consider a document as unimportant and short-lived will often be made on a case-by-case basis, and is then part of the analysis described under 5.3.1 and 5.3.2.

However, a type or category of documents can be considered or treated as unimportant and short-lived by a records schedule, a procedural regulation, or by a routine administrative practice, in which case it should be seen as falling under an exception to registration.

**Is the information considered or treated as unimportant and short-lived in a records schedule, a procedural regulation or by a routine administrative practice?**

If **yes**, the document falls under an exception to registration, and does not have to be registered.

## 5.4. Rules for encoding essential descriptive data (metadata)<sup>19</sup>

The structure of this chapter follows the list of essential descriptive data given in the Implementing rules on registration.<sup>20</sup>

Reference will also be made to the ongoing work of the DG for Informatics (DIGIT) to draft rules on metadata syntax for registered documents<sup>21</sup>. It should be made clear that the work of the DIGIT on syntax rules aims only to define a common language to allow data exchange between document management applications, or in other words technical syntax rules.

This chapter on the other hand will deal with rules and syntax from a user's perspective, that is to say giving rules on what sources to use for collecting different types of metadata from documents, and, when necessary, how this metadata should be encoded and in what form.

It should be noted that this chapter only deals with essential descriptive data. Most registration systems in use at the Commission allows other descriptive data to be encoded as well.

### 5.4.1. General rules

If a given type of information on the document is illegible, it should be registered with that particular metadata given as *unreadable*.

### 5.4.2. General rules for encoding dates

The DIGIT rules on Metadata syntax for registered documents lays down the basic rule that all dates should be saved in the format YYYY-MM-DD, according to the International Standard ISO 8601.

This does not mean that dates will have to be *encoded* or *presented* in this format. The only thing which must remain uniform across all systems involved is the storage format.

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<sup>19</sup> For more details on the concept of *descriptive data* (metadata), see 8.2.

<sup>20</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, article VIII(1).

<sup>21</sup> Metadata of registered document, ADMIN/DI/SSI-SAI/NAP D(2003). The text in this manual is based on draft version 3.7, dated 10 September 2003.

#### 5.4.3. *Date of the document*

The **date of the document** is primarily the one actually written on the document with the express purpose to indicate on what date it was (for example) produced, approved, or sent out by its author.

If there is no such date on the document, a transmission date reflecting the author's actions or intentions (for example the date of a postmark on an envelope, the date automatically stamped on a document by a fax machine, or the send date in an e-mail) can also be used.

The important issue is that the metadata saved as *date of the document* should reflect the actions or intentions of the author. If it does not exist at all as indicated above, or is illegible, it should not be made up or be given a random value, nor be taken from any other date appearing on the document for one reason or another (for example the date of a previous registration in another service). In such cases it should be given as *no date*, or shown as an empty value (for example 00/00/0000).

#### 5.4.4. *Date of registration*

The **date of registration** is the date when the document is registered. In practical terms this means the date when the *practical operations of registration* (see 5.1) are carried out. This should normally be the same day as the day when the document is received or formally drawn up (see 4.2.5).

Unless a registration service is set up in such a way that documents will always be registered on the very day when they are received or formally drawn up, the *date of registration* metadata as it appears in the register can never constitute absolute proof that a document arrived or was sent out on that date. However, it is always a strong indication that such is the case.

#### 5.4.5. *Registration number (unique identifier)*

The **registration number** is a composite, alpha-numeric metadata that has several elements, only one of which is the incremental number often meant in daily use of the term "registration number". Possible elements of the *registration number* in the sense of this point are, in no particular order:

- An incremental number, unique within a series that is defined and described by some or all of the other elements included in this list;
- A code to signify the type of registration or registration process, for example A for incoming mail ("arrivée") and D for outgoing mail ("départ");
- The year and/or the date of the registration;
- The service responsible for drawing up or for registering the document;
- A code to signify the version of the document;
- A code to signify the language of the document, in the case of a document that exists in several, parallel language versions;



- A code to signify the part of a multi-part document.

Together, some or all of these elements must form a unique identifier for each registered document.

Each register (whether general or specific) shall have its own incremental number series, which must give the best possible guarantees of consistency and continuity in numbering.<sup>22</sup> In computerised systems the incremental number must therefore be automatically given by the system.

The incremental number series in a given register shall, except for duly substantiated reasons, be reset to zero on January 1<sup>st</sup> each year.<sup>23</sup> The continuity within a year may only be interrupted if the reasons for the discontinuity are documented, or if it is a known specific feature of the system used.<sup>24</sup>

#### 5.4.6. *Author of the document*

The **author of the document** is the person(s) or the organisational entity/entities *formally responsible for its content*, or otherwise clearly indicated as the author by the contents and context of the document.

A document can, of course, have several authors. In the case of multiple authors, the number to be registered may be limited by the system or (if the system allows an unlimited number of authors) by choice.

If a document has more authors than the system is technically capable of registering, the registration service must decide which author(s) to register. Priority should be given to any author who seems to have had a coordinating or leading role in drafting the document. If it is not possible to make any such distinction, it is recommended that the author(s) first mentioned be chosen.

If the system allows an unlimited number of authors to be encoded, it is recommended that as large a number of authors as practically possible are registered. The exact number can hardly be fixed in advance, and must be left to the discretion of the registration service. As a general recommendation, however, ten or more authors should only be registered if it is deemed really useful to do so.

In the case of for example petitions (which could have thousands and thousands of authors) registration should always be limited to contact persons, or those

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<sup>22</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, article IX(2).

<sup>23</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, article IX(2).

<sup>24</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, footnote 22.

responsible for handing it over. If no such distinction can be made, the first person to have signed shall be deemed to be the author.

In all cases where a document has more authors than registered, it is recommended that a note is made to this effect in a suitable field (remarks, note, or similar).

If a document is anonymous, it should be registered with the author given as *anonymous*. (See also 4.1.2).

#### 5.4.7. *Department or body to which an author belongs*

The **department or body to which an author belongs** is at least the name of the organisational entity to which an author belongs or which an author represents. This metadata can also contain address or contact information.

If a document is received from a private person, or with no mention of *the department or body to which the author belongs*, the metadata should be given as *not applicable*.

#### 5.4.8. *Addressee of the document*

The **addressee of the document** is the person(s) or the organisational entity/entities to which the document is addressed.

A document can, of course, have several addressees. In the case of multiple addressees, the number to be registered may be limited by the system or (if the system allows an unlimited number of addressees) by choice.

If a document has more addressees than the system is technically capable of registering, the registration service must decide which addressee(s) to register. Priority should be given to any addressee who is deemed to be the main recipient of document. An addressee can be the main recipient either in absolute terms, or from the point of view of the DG/Service responsible for the registration. For example in the case of a document addressed to 20 Director Generals in 20 DGs, each DG should normally consider its own Director General to be the main recipient unless it's clearly indicated otherwise. If it is not possible to distinguish a main recipient, it is recommended that the addressee(s) first mentioned be chosen.

If the system allows an unlimited number of addressees to be encoded, it is recommended that as large a number of addressees as practically possible are registered. The exact number can hardly be fixed in advance, and must be left to the discretion of the registration service. As a general recommendation, however, ten or more addressees should only be registered if it is deemed really useful to do so.

In the case of outgoing documents distributed according to send lists (which could have large numbers of addressees) priority should be given to any addressee who is deemed to be the main recipient of document. If it is not possible to distinguish a main recipient, it is recommended that the addressee(s) first mentioned be chosen.

In all cases where a document has more addressees than registered, it is recommended that a note is made to this effect in a suitable field (remarks, note, or similar). In particular the registration of an outgoing document distributed according

to a send list must mention that a send list has been used (see 8.1.3 for a further discussion of the importance of metadata to distinguish logical document unity).

#### 5.4.9. *Department or body to which an addressee belongs*

The **department or body to which an addressee belongs** is at least the name of the organisational entity to which an addressee belongs or which an addressee represents.

This metadata can also contain address or contact information.

If the addressee is a private person, or if there is no mention of *the department or body to which the addressee belongs*, the metadata should be given as *not applicable*.

#### 5.4.10. *Level of security classification of the document*

The **level of security classification of the document** is only used for documents classified according to the Commission provisions on security, that is to say EU RESTRICTED, EU CONFIDENTIAL, EU SECRET, and EU TOP SECRET.

EU CONFIDENTIAL, EU SECRET, and EU TOP SECRET documents must always be registered in specific EU Classified information (EUCI) registers<sup>25</sup> (see 8.4.1 (2)(b)).

EU RESTRICTED documents can in principle be registered in the same registers as unclassified documents, provided that sufficient technical and administrative procedures are in place to ensure protection against unauthorised access to the documents. If this is done, the *level of security classification of the document* for unclassified documents should be NORMAL.

#### 5.4.11. *Security designators and markings of the document*

*Security designators* and *markings* are not the same thing.

**Security designators** shall only be used in combination with a classification (see 5.4.10), to set limits to the validity of a classification or where there is need for a limited distribution and special handling in addition to that designated by the security classification.<sup>26</sup> The rules on the layout of EU Classified Documents equally apply to security designators.<sup>27</sup>

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<sup>25</sup> Commission provisions on security, annexed to the Rules of procedure of the Commission by Commission Decision No 2001/844/EC, section 22.

<sup>26</sup> Commission provisions on security, annexed to the Rules of procedure of the Commission by Commission Decision No 2001/844/EC, section 16.2.

<sup>27</sup> Security Directorate, Security Notice 06, version 06.06.2002.

**Markings** may be applied by the author to documents and envelopes to control the flow of information. More than one marking may be used for a given document. The Commission Security Office in cooperation with the Council, the Commission Secretariat General and DG ADMIN has created a list of agreed markings. No other markings are to be used unless they have followed the same procedure to be agreed.<sup>28</sup>

For a list of some agreed markings, see 7.2.

#### 5.4.12. *Title or subject of the document*

The primary objective of the **title or subject of the document** is to succinctly describe the contents of the document, in order to understand what it is mainly about without having to consult the document itself.

Many documents already have a title. This may be copied and encoded as the *title or subject of the document*, on the absolute condition that it fulfils the above primary objective. In other words, the original title on a document may not be automatically re-used for registration. The document must always be checked, at least briefly, to make sure that the original title is a good enough description of the contents of the document.

To limit the number of potential searches necessary to find a document, the *title or subject of the document* must always be written in English or French.

If the original title of the document is in another language than English or French, it may be copied and encoded in addition to the mandatory *title or subject* in English or French. If this is done, the original title shall come after the *title or subject* in English or French, separated by the string <space>=<space>. Whether to use this practice or not is for each DG/Service to decide.

If the search functions of a registration system **are not** case sensitive, the *title or subject of the document* may be encoded *either* using only upper-case *or* using both upper- and lower-case characters. In this context, it should be noted that using only upper-case somewhat facilitates encoding, while using both upper- and lower-case makes a text considerably easier to read.

If the search functions of a registration system **are** case sensitive, only upper-case characters should be used for encoding the title or subject of the document.

Depending on the technical capacities of a given registration system, and the choice of a DG/Service, diacritical characters must either be represented in full, or transliterated according to the tables in Annex 2 (Transliteration tables). They may not simply be left out.

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<sup>28</sup> Protocol and Security Service. Security Notice 01/2001, update 1, 12.12.2001.

If a date is mentioned in the title or subject of the document, it should always be encoded in the format DD/MM/YYYY.

Personal data may never be encoded as part of the *title or subject of the document*.

#### 5.4.13. *Type of document concerned*

There is as yet no decision on a general typology of documents to be used for the **type of document** metadata.

#### 5.4.14. *Relevant heading of the filing plan*

Every registered document must be kept permanently in a file.<sup>29</sup> This file must in its turn be associated with a final-level heading of the filing plan.<sup>30</sup>

The relevant heading of the filing plan is thus the final-level heading to which the file is associated. It may be referred to in the register by its official decimal code, its title, or both. If technically possible, the reference in the register may also contain other information elements such as any local codes or abbreviations used to identify the heading.

#### 5.4.15. *File title*

The **file title** is part of the essential descriptive data for a file<sup>31</sup>, and the *file title* in the register reference should be the same as in the file list<sup>32</sup>.

#### 5.4.16. *Number of attachments*

As discussed under 8.1.3, one document (=one registration) may well consist of several physical units, for example a covering note plus main document, or a main document with annexes (or other combinations). **The number of attachments** is the number of physical units (see 8.1.3) *other* than the covering note/main document/similar on which the registration is based.

In the case of an e-mail, the e-mail itself is considered to be the covering note/similar, unless it is completely empty or void of information.

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<sup>29</sup> Implementing rules for Article 5 of the provisions on document management, SEC(2003)349/2, article VII(2)(B).

<sup>30</sup> Implementing rules for Article 5 of the provisions on document management, SEC(2003)349/2, article VI(1)(B).

<sup>31</sup> Implementing rules for Article 5 of the provisions on document management, SEC(2003)349/2, article VII(2)(C).

<sup>32</sup> Implementing rules for Article 5 of the provisions on document management, SEC(2003)349/2, article VIII.

For example, if an incoming mail consists of a main document with five annexes, the *number of attachments* is five.

#### 5.4.17. *Brief description of attachments*

The **brief description of attachments** may include:

- a brief description of each attachment similar to the title or subject of a document (see 5.4.12);
- a code to indicate the language of the attachment, similar to the one used as part of the registration number of a document (see 5.4.5);
- in the case of attachments in electronic format, an indication of the format(s) used, for example .doc, .tif, .pdf, etc.

## **6. PROCESSING OF PERSONAL DATA**

All processing of personal data in Commission registers must comply with 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.

Detailed rules for the application of Regulation 45/2001 in the registration of documents will be drafted separately.

## 7. REGISTRATION OF CLASSIFIED DOCUMENTS

This chapter is not intended to explain all the rules and regulations for dealing with classified or similar documents. The aim is rather to give a brief overview of the different types of classified documents, and how the rules on registration apply to them.

However, the obligation to register a document is not connected to whether it has fallen, falls, or may at some point in the future fall under the exceptions to public access to documents<sup>33</sup>. See also 8.4.2 (1).

### 7.1. EU Classified Information (EUCI) documents

There are four levels of **EU Classified Information (EUCI) documents**, ranging from the lowest, EU RESTRICTED, via EU CONFIDENTIAL and EU SECRET to the highest, EU TOP SECRET.<sup>34</sup>

Registration of documents classified EU CONFIDENTIAL or EU SECRET is the responsibility of one or more local EUCI registries in each department<sup>35</sup>, while registration of EU TOP SECRET documents is the responsibility of the central EU TOP SECRET registry (or possibly, if any such has been established, an EU TOP SECRET sub-registry).<sup>36</sup> The resulting registers are considered *specific registers* (see 8.4.1(2)).

The Commission provisions on security do not specify any such responsibility for documents classified EU RESTRICTED. For a further discussion of registration of EU RESTRICTED documents, see 8.4.1(2) (2)(b).

Otherwise, *EUCI documents* are subject to the same obligations to register as any other document.

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<sup>33</sup> Regulation (EC) No 1049/2001, article 4.

<sup>34</sup> Commission provisions on security, annexed to the Rules of procedure of the Commission by Commission Decision No 2001/844/EC, section 16.1.

<sup>35</sup> Commission provisions on security, annexed to the Rules of procedure of the Commission by Commission Decision No 2001/844/EC, section 22.1.

<sup>36</sup> Commission provisions on security, annexed to the Rules of procedure of the Commission by Commission Decision No 2001/844/EC, section 22.2.1.



## 7.2. Security markings

**Security markings** may be applied to documents and envelopes to control the flow of information. Such markings may only be applied by the author of the document, and do not constitute a security classification (see 7.1). More than one marking may be used for a given document.

The Commission Security Office in cooperation with the Council, the Commission Secretariat General and DG ADMIN has created a list of agreed markings. No other markings are to be used unless they have followed the same procedure to be agreed.<sup>37</sup> Some agreed markings are:

<b>Marking</b>	<b>Significance/action to take</b>
Medical Médical Arztsache	The content is covered by rules on medical confidentiality. Only to be processed by staff authorised by the medical service.
Staff matter Affaire du personnel Personalsache	Only to be processed by staff of personnel departments and by management concerned.
Personal Strictelement personnel Persönlich	Only to be opened by addressee.
Deadline: ... Date limite: ... Frist: ...	Indicating deadline for an action.
Embargo until ... Embargo jusqu'à ... Embargo bis ...	Indicating date/time before a document may be published
Limited Limité Intern	Indicating that a document may be made available only to those who have a need to know within the European institutions and the Member States.

The above list is not necessarily complete. For a full and up-to-date list of agreed security markings, one should contact the Commission Security Office.<sup>38</sup>

Documents with *security markings* are subject to the same obligations to register as any other document. However, there must be sufficient technical and administrative procedures in place to ensure protection against unauthorised access.

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<sup>37</sup> Protocol and Security Service. Security Notice 01/2001, update 1, 12.12.2001.

<sup>38</sup> Protocol and Security Service. Security Notice 01/2001, update 1, 12.12.2001.

## 8. DEFINITIONS

### 8.1. Document

#### 8.1.1. *What is a document?*<sup>39</sup>

A document is **any content** independent of medium<sup>40</sup>. In other words, it does not matter if it is text written on paper or in an e-mail, sound registered on a tape, or pictures stored in an electronic format on a CD-ROM. No matter what type of information, what format, what physical support, it is a document.

The above is the general definition of a document. For the purposes of this manual, however, the definition is a bit more limited. For a document in the general sense to be a document in the Commission sense, it must also concern the **policies, activities and decisions** of the Commission.

Finally, for a document to be concerned by the provisions on document management (including registration) or public access it must be **formally drawn up or received by**, and in the **possession** of the Commission.

This is all straightforward enough. However, the above definition leaves several questions still to be answered. These will be dealt with under points 8.1.3 to 8.1.7.

#### 8.1.2. *Is there such a thing as an official document?*

No.

The concept **official document** does not exist anywhere in the legal base concerning document management in the Commission. However, the term is fairly widespread and often used to indicate important types of Commission documents, for example documents published in the Official Journal, COM and SEC documents, minutes from the meetings of the College of Commissioners, white papers, etc. This usage of the term *official document* is acceptable, as long it is born in mind that from a formal point of view such documents are no more official than any other fulfilling the criteria discussed under point 8.1.1.

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<sup>39</sup> Provisions on document management, annexed to the Rules of procedure of the Commission by Commission Decision No 2002/47/EC, articles 1 and 4.

<sup>40</sup> Regulation (EC) No 1049/2001, article 3. The following media are explicitly mentioned: written on paper; stored in electronic form; sound, visual or audio-visual recording.

### 8.1.3. *How can an individual document unit be identified?*<sup>41</sup>

It is not always obvious what should be considered **one individual document unit**, and thus the basis for one registration.

The question of document unity can be approached in different ways, the most important of which are respectively *physical unity* and *logical unity*.

The question of **physical unity** deals with the physical format of the document, and in particular of the parts which make up the document. To give an example, a number of paper sheets stapled together<sup>42</sup> might be considered one document because they are a physical unit. This approach, however, has serious weaknesses. The fact that (for example) a number of paper sheets are a physical unit is no proof that all the information on them belong together, or that they contain all the information which actually do belong together. For example it might not be possible to staple together a 200 page document, with the result that several physical units (say, four bundles of 50 pages each) are created. Nevertheless, there is only one document. Likewise, if the staples are removed from the 200 pages and the individual sheets separated from each other, it does not mean that 200 documents have suddenly been created. There is still only one document, even though it consists of 200 separate physical units.

The physical unity approach is thus not sufficient for identifying an individual document. It may at best give indications about document unity, for example in the sense that if a number of pages are joined together it usually signifies that they have something to do with each other.

The **logical unity** approach on the other hand mainly considers content and context.

Of course, logical unity may well go hand in hand with physical unity. The most obvious example would be a single page containing all the information to make a complete document. In order to separate the physical from the logical in this case, one would have to tear up the page.

In many cases, however, physical and logical unity is less obviously connected. An analysis of content and context is necessary. Important indicators of *logical unity* are such things as covering notes, title pages, tables of content, chapters, headings, page and annex numbering, etc. For example a table of content may indicate that a document should consist of an introduction, five chapters, conclusion and three annexes. No matter of how many physical units<sup>43</sup> the document is made up, a quick

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<sup>41</sup> The text of this point is not based on any source document.

<sup>42</sup> The stapling together of paper sheets is of course only one example of the many ways in which document parts are joined together to form physical unities, and used here for the purpose of illustrating the argument.

<sup>43</sup> Perhaps one unit for the introduction, one per chapter, etc.; perhaps one for the main text and one for each of the annexes; perhaps only one altogether; the possibilities are many.

comparison between the table of contents and the physical units would make it clear that it is the case of only one logical unit, and thus only one document. In the same way, pagination can be used to verify the integrity of a logical unit. For example, if there are ten pages numbered from 1(10) to 10(10) this is a good indication of logical and document unity.

Likewise, a covering note often serves to make it clear that several physical units form a single logical unit together. A good example would be the launch of an inter-service consultation, where the covering note serves to logically unite all physical units (main text, annexes, explanatory notes, etc.) of the original consultation launch by making it clear that they are all logically part of the document offered for consultation.

However, just because several physical units arrive (or are sent) together, it does not automatically mean that they belong together. A covering note may make it clear that they have no logical connection, for example by stating that the physical units in question concern separate and different subjects.

Another very important indicator of logical unity is the metadata needed to describe a document. In principle, if two different sets of metadata have to be used to describe something, this means there are two documents. If, for example, exactly the same information is sent to two different recipients only one of which is mentioned on each copy, the recipient metadata for each copy will be different and there will be two documents, and two registrations. If, on the other hand both recipients are mentioned on both copies<sup>44</sup>, one set of recipient metadata correctly describes all copies, thus there is only one document and one registration.

#### 8.1.4. *When is a document considered formally drawn up?*<sup>45</sup>

There is a very important difference to be made between the **physical existence** of a document (for example as words written on paper, sounds recorded on tape, or a series of zeroes and ones on a computer hard drive), and its **formal existence** as having been *formally drawn up*. A document may very well exist physically without existing formally. Nevertheless, it is only when a document created at the Commission exists *formally* by having been *formally drawn up* that it can be considered for registration.

A document is considered **formally drawn up** when it has been *approved as ready* by the *author* and is ready for *formal transmission*.

In this context, **author** does not mean the official(s) charged with the practical task of drafting/typing the document.<sup>46</sup> The author is the person or the organisational

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<sup>44</sup> For example in an attached send list. See also 5.4.8.

<sup>45</sup> The text of this point is not based on any source document.

entity *formally responsible for the content* of the document directly in accordance with the established rules and procedures of the Commission (including the rules and procedures on delegation).

A document is **approved as ready** either by an act of approval (for example a signature), or by *de facto* treating the document as ready (for example by sending it to the intended recipient(s), by making it accessible via a website, etc.).

**Ready** in this context does not necessarily mean the final version. An intermediate or draft version of a document may be considered ready as such (for example ready to be sent out for a formal inter-service consultation).

**Transmission** means an author sending a document to a recipient. This recipient can be a *person*, an *organisational entity*, or an *archiving/information system*.

If the recipient is a **person** or an **organisational entity**, *transmission* is **formal** when the recipient<sup>47</sup> is the one for whom the document is ultimately intended.

If the recipient is an **archiving/information system** (for example in the case of a note to the file) *transmission* is **formal** when the document is incorporated into the system.

#### 8.1.5. What happens if a document is registered but not transmitted?<sup>48</sup>

As said elsewhere in this manual (see 4.1.1), one of the main purposes of document registration is to certify transmission from an author to a recipient. Ideally this means that a document should not be registered until it has been sent. However, for practical reasons this is often not possible, given that one of the practical operations of registration (see 5.1) usually is to put the registration number on the document. Obviously, in a mixed paper/electronic document management system, such as the one currently used in the Commission, it is not possible to first send off a document, and then write a registration number on it.

This is why the definition of a formally drawn up document (see 8.1.4) states that a document is formally drawn up and should be registered only when it is ready for formal transmission. In other words, registration should be the very last operation before the document is actually sent, and the two operations must in principle be carried out directly one after the other and on the same day.

However, if for practical reasons registration and transmission has to be two separate operations, the possibility exists that a document is registered but for some reason not actually transmitted. If this happens, the document can no longer be considered drawn up, and the registration will have to be cancelled. This is *not* done by erasing the record of registration, but by adding a comment or notification to it, explaining why and when the registration had to be cancelled.

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<sup>46</sup> Of course, the author in the formal sense, and the one doing the actual typing may very well be the same person, but this is beside the point. The key issue here is responsibility.

<sup>47</sup> By “recipient” is, of course, meant one recipient or several, depending on circumstances.

<sup>48</sup> The text of this point is not based on any source document.

8.1.6. *What is a document for continuous use? When is it drawn up?*<sup>49</sup>

Certain documents do not fall under the definition above (8.1.4), because they are meant for continuous use. A typical example of this kind of document would be a register<sup>50</sup>. It makes no difference if the document is on paper (for example a registration ledger) or in electronic format.

For all practical purposes such a document is never finished. There is always the possibility of some more information (another entry in the register, another post in the database, etc.) being added.

This type of document is called a **document for continuous use**. It is considered *formally drawn up* when it has been *approved as ready to receive the first entry of information*.

A document for continuous use is **approved as ready to receive the first entry of information** when it is made *available* to its users for *entering the intended information*. If the document is available to its users, it is approved as ready, and thus formally drawn up, even though no entry of information has yet been made.

**Intended information** is that for which the document has been conceived. Making for example an electronic registration tool available to its users for testing does not constitute approval as ready, just as information entered for test purposes does not constitute intended information.

8.1.7. *When is a document considered received?*<sup>51</sup>

A document is considered **received** when it is *available* to the service(s) for which it is intended.

**Available** means that the document has *arrived* at the *premises* of the service, or has been *handed* to an *official competent to deal with the document*, or can be accessed through an information system available to the service.

In the case of a document **accessible through an information system**, there must also be intention of transmission from the author to the Commission. For example, a document is not received by the Commission simply because it is accessible via a website somewhere in the world. If, however, someone makes it known to the Commission that a document, which that someone wishes the Commission to have,

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<sup>49</sup> The text of this point is not based on any source document.

<sup>50</sup> Registers and databases are, of course, documents in their own right, since they fall well within the basic definition of a document: any content independent of medium.

<sup>51</sup> The text of this point is not based on any source document.

is available at a certain web address, the document in question is then considered received by the Commission<sup>52</sup>, and should immediately be downloaded and processed for possible registration in the same way as a document received by post.

**An official competent to deal with the document** is either an official involved in the handling of the matter to which the document is related, or an official charged with the task of receiving or treating incoming documents.

A document **handed** to *an official competent to deal with it* is considered available to the service at the moment of handing over, no matter where or when this takes place. If the document fulfils the conditions for registration (see 4.2.1), it must then be registered as soon as practically possible.

A document **handed** to *any other official* is not considered available to the service at the moment of handing over, but must, of course, be forwarded to *an official competent to deal with it* as soon as practically possible.

**Tenders**, or similar documents, sent under sealed cover to be opened at a certain date and hour obviously cannot be registered until this date and hour has arrived and they have been opened. After opening they are considered received on the date of the postmark.

#### 8.1.8. *When is a document considered important and not short-lived?*

When deciding if a document falls under the obligation of registration, the key issue will often be the third criterion (see 4.2.1), that is to say if the document is *important* and *not short-lived*. It is normally fairly straightforward to decide if a document has been received or formally established (first criterion), and likewise to know if it is likely to require action, follow-up or a reply, or involves the responsibility of the Commission (second criterion).

**Important** and **not short-lived**, on the other hand, are criteria subject to subtle judgement. What is important? What is unimportant? Just how short is short-lived?

These judgments will of course vary with the content and context of the document. The following should therefore be seen as indicative advice to help make those judgments rather than strict and absolute rules.

The Implementing rules on registration give a good indication on how to think when deciding about the importance of a document, by saying that a document is unimportant and short-lived if its loss “would not prevent the departments concerned meeting the Commission’s administrative or evidential needs”<sup>53</sup>.

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<sup>52</sup> Provided, of course, that the document can actually be found and identified at the given web address.

<sup>53</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, footnote 12.

In other words, when judging the importance of a document one should consider the effect of not having it available when accounting for the actions based on the content of that document. Has the Commission (at any level, from the College of Commissioners via a DG or other department to an individual official) made a decision, paid out money, entered into a legal obligation, or taken some other kind of action based on a certain document? Would the document be needed if that action at some point had to be defended or explained? Or would the document be necessary to prove that the Commission has fulfilled its legal, financial, administrative or other obligations? If **yes**, the document is important.

This importance may of course be short-lived. After a short time, it no longer matters if the action can be defended or explained. This is simple enough. The difficulty is of course to identify the (more or less) exact limit of a *short* time. The Implementing rules talk about the value of a document being clearly temporary, and rapidly lapsing.<sup>54</sup> It seems reasonable to assume that this should be measured in weeks rather than months, and for the purposes of this manual short-lived is considered to be a time span of about two to four, and certainly no longer than six weeks.

However it is essential to consider not only the importance of the document itself, but also to evaluate its aggregate value together with similar documents. For example, the Code of good administrative behaviour lays down certain obligations and deadlines for answering correspondence from the public. The standard deadline is 15 working days.<sup>55</sup> The subject matter of such correspondence may very well be of no importance whatsoever for the Commission, or maybe next week it will have lost any importance it first had. However, the Commission might have to prove that it has fulfilled its obligation to answer within the deadline. In particular the Commission is quite likely to have to prove that it has systematically answered all correspondence from the public within the deadline. To do this, track must be kept of both the incoming correspondence and the outgoing answers. In other words, while they are often unimportant individually they are important together and must thus be registered.

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<sup>54</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, footnote 12.

<sup>55</sup> Code of good administrative behaviour for the staff of the European Commission in their relations with the public, annexed to the Rules of procedure of the Commission by Commission Decision No 2000/633/EC, ECSC, EURATOM, article 4.



## 8.2. Descriptive data (metadata)

### 8.2.1. *What is descriptive data (metadata)?*

The terms **descriptive data** and **metadata** are completely synonymous. They can be defined as *information describing some other information*. A document is, of course, a piece of information in its own right. When a document is registered, a description of it is created, saved, and permanently attached to the document. This description typically contains information elements like who is the author of the document, what is its title, when was it received, what is its registration number, etc. All these information elements are descriptive data – they describe the document they relate to.

The two terms *descriptive data* and *metadata* are used interchangeably in this manual.

### 8.2.2. *What is essential descriptive data?*

**Essential descriptive data** is descriptive data that *must* be created and saved *if it exists for the document in question*. If, exceptionally, a certain type of essential descriptive data does not exist for a given document, the document must be registered without it, leaving the relevant field empty, or (if possible) with the mention *no data* or similar.

### 8.3. Register and inventory

#### 8.3.1. What is a register, what is an inventory and what is the difference between them?

If a document fulfils certain conditions (see 4.2.1), it must be registered. The tool, computerised or not, used for this action is called a **register** and the action is called **to register**.

If a document does not fulfil the conditions just mentioned registration is no longer mandatory. Nevertheless, it might sometimes be necessary or of interest to manage a document even though it does not have to be registered. The tool, computerised or not, used for such an action is called an **inventory**, and the action is called **to list**.<sup>56</sup>

The essential **functional** difference is thus that *registration is mandatory* and must be done if a document fulfils certain conditions, while *listing a document in an inventory is optional*.

There is also a **formal** difference between register and inventory. A *register* must certify transmission with due regard to established forms and procedures, but also serve other purposes (see 4.1.1), among them to identify and keep track of documents. An *inventory*, on the other hand, mainly serves to identify a document, and does not have to certify transmission, form or procedure.

Finally, the terms **register** and **inventory** not only designates the specific tools used to carry out the tasks of registering or listing. They also mean these tools *plus* all the metadata they contain about the registered or listed documents.

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<sup>56</sup> From a terminological point of view it is important to note that it is **not** possible *to register* a document in an *inventory*. You *register* in a *register*, and *list* in an *inventory*. Furthermore, the practical action of typing information into a register (or an inventory for that matter) is *to encode*, and **not to register**.

## 8.4. What types of registers are there at the Commission?

### 8.4.1. Primary registers

**Primary registers** at the Commission are registers for mandatory registration (see 4.2.1) of documents, which are used by officials to *directly capture descriptive data* (see 8.2) concerning these documents. It should be noted here that although these primary registers are mainly intended for internal use, they are of course also documents in their own right and as such subject to demands for access.

In accordance with the legal basis for document management, there are several types of primary registers at the Commission.

#### (1) General register

The **general register** is the *main tool*. At the moment of writing, this tool at the Commission is **Adonis**, and the general register's main purpose is registering incoming and outgoing correspondence.<sup>57</sup>

#### (2) Specific registers

Any registration tool separate from the general register and used for mandatory registration of documents is considered a **specific register**. To qualify as a specific register, such a tool must also fully comply with the implementation rules on registration.<sup>58</sup>

There is no limit to the number of specific registers that may be used. Some may exist mainly because they are considered useful, others because they are mandatory according to the legal basis for document management. However, there are two basic types of specific registers: for non-classified and for EU classified information.

##### (a) Specific registers for non-classified documents

These are normally registers used for a specific procedure or purpose, or for a specific type of documents. Some examples are CIS-Net (used to register documents in connection with the procedure for Interservice consultations) and the Central Invoices Register (used to register invoices sent to the Commission). The tools and systems used for these specific registers may also include functions for the procedural or workflow treatment (see 4.3) of

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<sup>57</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, article III(a) and footnote 5.

<sup>58</sup> Implementing rules for Article 4 of the provisions on document management, SEC(2003)349/1, article III(b) and footnote 6.

the documents involved. In this context, however, they are of interest only because of their function as specific registers.

(b) *Specific EU classified information (EUCI) registers*

There are four levels of EU classified information, ranging from the lowest, EU RESTRICTED, via EU CONFIDENTIAL and EU SECRET to the highest, EU TOP SECRET.<sup>59</sup>

Registration of documents classified EU CONFIDENTIAL or EU SECRET is the responsibility of one or more local EUCI registries in each department<sup>60</sup>, while registration of EU TOP SECRET documents is the responsibility of the central EU TOP SECRET registry (or possibly, if any such has been established, an EU TOP SECRET sub-registry).<sup>61</sup> The resulting registers are considered *specific registers* even should they not fully comply with the implementation rules on registration.

The Commission provisions on security do not specify any such responsibility for documents classified EU RESTRICTED. It can thus be inferred that EU RESTRICTED documents may be registered in the general register, or in various specific registers otherwise used for the registration of non-classified documents.

However, such registration must make sure that the descriptive data recorded does *not* contain any information protected by the EU RESTRICTED classification. Furthermore, the tool used for registration may have a function that makes it possible to give direct access to the document itself (for example by storing a scanned image of the document). Such a function should *not* be used for an EU RESTRICTED document, unless it is certain that the tool gives sufficient protection against unauthorised access.

It is recommended that registers (general or specific) used for non-classified documents are not used to register EU RESTRICTED documents also, unless sufficient technical and administrative procedures are in place to ensure protection against unauthorised access. In this context, the option of using a separate specific register for EU RESTRICTED documents should always be considered.

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<sup>59</sup> Commission provisions on security, annexed to the Rules of procedure of the Commission by Commission Decision No 2001/844/EC, section 16.1.

<sup>60</sup> Commission provisions on security, annexed to the Rules of procedure of the Commission by Commission Decision No 2001/844/EC, section 22.1.

<sup>61</sup> Commission provisions on security, annexed to the Rules of procedure of the Commission by Commission Decision No 2001/844/EC, section 22.2.1.

**Secondary registers** at the Commission are registers containing information about documents for which registration is mandatory, but which are not used to directly capture descriptive data. Instead, a secondary register is fed information from one or more primary registers (or other systems).

(1) *Public register*

The Commission must provide public access to a register of documents<sup>62</sup>, the coverage of which shall be gradually extended<sup>63</sup>. This has been done by setting up a secondary register called the **public register**<sup>64</sup>. At the moment this register contains references only to certain types of documents<sup>65</sup>.

This will, however, be gradually extended, and this public register must eventually contain references to all registered documents in the Commission, no matter in which primary register they have been registered.

A very important difference between this public register and the primary registers supplying information for it is the essential descriptive data required. In other words, the mandatory set of metadata is different, being much more restricted for the public register compared with the various primary registers.

For each document, the public register shall contain a reference number, the subject or title of the document (in all available languages) and/or a brief description of its content, an indication of its author, and the date on which it was drawn up, received, created or adopted.<sup>66</sup> This is considerably less than the metadata demanded for primary registers at the Commission (see 5.4).

Also, references in the public register must not contain any information protected by the exceptions on public access to documents.<sup>67</sup> In other words, if a document contains information which is thus protected<sup>68</sup>, the official who

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<sup>62</sup> Regulation (EC) No 1049/2001, article 11(1).

<sup>63</sup> Detailed rules for the application of Regulation (EC) No 1049/2001, annexed to the Rules of procedure of the Commission by Commission Decision No 2002/937/EC, article 8(1).

<sup>64</sup> [http://europa.eu.int/comm/secretariat\\_general/regdoc/recherche.cfm?CL=en](http://europa.eu.int/comm/secretariat_general/regdoc/recherche.cfm?CL=en)

<sup>65</sup> COM, SEC, and C documents, as well as agendas and minutes from Commission meetings.

<sup>66</sup> Detailed rules for the application of Regulation (EC) No 1049/2001, annexed to the Rules of procedure of the Commission by Commission Decision No 2002/937/EC, article 8(1); Regulation (EC) No 1049/2001, article 11(2).

<sup>67</sup> Regulation (EC) No 1049/2001, article 11(2).

<sup>68</sup> The exceptions for public access to documents are given in Regulation (EC) No 1049/2001, article 4.

encodes the essential descriptive data must make sure that no protected information is included in any reference which will (immediately or later on) be displayed in the public register.

Finally, *sensitive documents* may appear in a public register only with the consent of the originator.<sup>69</sup>

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<sup>69</sup> Regulation (EC) No 1049/2001, article 9(3).

## 9. GLOSSARY

### 9.1. English–French

addressee	destinataire
author	auteur
document management	gestion des documents
drawn up	établi
encode	encoder
incoming mail	arrivée
inventory	répertoire
list [in an inventory] (verb)	répertorier
outgoing mail	départ
received	reçu
register (noun)	registre
register (verb)	enregistrer

## 9.2. Français–anglais

arrivée	incoming mail
auteur	author
départ	outgoing mail
destinataire	addressee
encoder	encode
enregistrer	register (verb)
établi	drawn up
gestion des documents	document management
reçu	received
registre	register (noun)
répertoire	inventory
répertorier	list [in an inventory] (verb)



## 10. LEGAL BASIS / SOURCE DOCUMENTS

*The manual mainly refers to the following source documents:*

- (1) “Registration and keeping registers of the Institution’s documents”. Implementing rules for Article 4 of the provisions on document management annexed to the Commission’s rules of procedure and to be applied in the Commission’s Directorates-General and equivalent departments, SEC(2003)349/1; in short *implementing rules on registration* or just *implementing rules*.
- (2) “Filing and the management of the Institution’s files”. Implementing rules for Article 5 of the provisions on document management annexed to the Commission’s rules of procedure and to be applied in the Commission’s Directorates-General and equivalent departments, SEC(2003)349/2; in short *implementing rules on filing*.
- (3) Provisions on document management, annexed to Commission Decision No 2002/47/EC of 23 January 2002 amending its Rules of Procedure (OJ L 21, 24.1.2002, p. 23); in short *provisions on document management*;
- (4) Detailed rules for the application of Regulation (EC) No 1049/2001 of the European Parliament and of the Council regarding public access to European Parliament, Council and Commission documents, annexed to Commission Decision No 2001/937/EC of 5 December 2001 amending its Rules of Procedure (OJ L 345, 29.12.2001, p. 94); in short or *rules for the application of regulation 1049/2001*;
- (5) Commission provisions on security, annexed to Commission Decision No 2001/844/EC of 29 November 2001 amending its internal Rules of Procedure (OJ L 317, 3.12.2001, p. 2); in short *Commission provisions on security*;
- (6) 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 (OJ L 145, 31.5.2001, p. 43); in short *regulation 1049/2001* or *public access regulation*;
- (7) 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 (OJ L 8, 12.1.2001, p. 1); in short *regulation 45/2001* or *personal data regulation*.

The above documents are interrelated in the following manner.

The *implementing rules on registration* (1) are based on the provisions in articles 4 and 12 of the *provisions on document management* (3) and constitute the most important part of the legal base for registration as an aspect of document management in the Commission.

The *implementing rules on filing* (2) are based on the provisions in articles 5 and 12 of the *provisions on document management* (3). In the context of registration, they give very important rules on how documents shall be incorporated into the Commission's document management system.<sup>70</sup>

The *provisions on document management* (3) are mainly concerned with the Commission's internal needs for and organisation of document management. Although it also explicitly mentions public access to documents as an important object for document management, it does not follow directly from regulation 1049/2001.

*Regulation 1049/2001* (6) establishes the ground rules concerning public access to documents in the institutions. Following the adoption of this regulation, the Commission has twice amended its internal rules of procedure. The *rules for the application of regulation 1049/2001* (4) then gives more detailed rules for how regulation 1049/2001 shall be applied in the Commission.

Finally, all the above documents refer to *regulation 45/2001* (7) on processing of personal data and/or the *Commission provisions on security* (5), while the two latter (directly or indirectly) refers back to some or all of the documents on document management and public access to documents.

*The manual also refers to the following source documents:*

- (8) Note à l'attention des membres du Groupe de liaison DMO – IRM, Objet : Code dossier dans NomCom, 2003 SG.G.3/es D(2003) 31410, 15.12.2003.
- (9) Metadata of registered document, ADMIN/DI/SSI-SAI/NAP D(2003). The text in this manual is based on draft version 3.7, dated 10 September 2003.
- (10) Security Directorate, Security Notice 06, version 06.06.2002.
- (11) Protocol and Security Service. Security Notice 01/2001, update 1, 12.12.2001.
- (12) Code of good administrative behaviour for the staff of the European Commission in their relations with the public, annexed to the Rules of procedure of the Commission by Commission Decision No 2000/633/EC, ECSC, EURATOM, article 4.

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<sup>70</sup> The implementing rules on registration and filing are to be followed by implementing rules on storage and appraisal and transfer to the Historical Archives respectively, neither of which had been adopted at the moment of writing (May 2004).

## 11. ANNEX 1 (LIST OF VERSIONS)

- |     |                     |                        |   |
|-----|---------------------|------------------------|---|
| (1) | 20.5.2003–12.5.2004 | Draft versions 1.0–9.5 | For use in the ad-hoc working group.  |
| (2) | 13.5.2004           | Draft version 9.6      | For final consultation of the ad-hoc working group.   |
| (3) | 25.5.2004           | Draft version 9.7      | Draft after final consultation (13-24.05.2004) of the ad-hoc working group.   |
| (4) | 25.6.2004           | Draft version 10.0     | Final draft after final consultation (13-24.05.2004) of the ad-hoc working group and after consultation (27.05-08.06.2004) of the DMO of the Legal Service. |
| (5) | 30.6.2004           | Version 1.0.           | Adopted by SG.B.3.  |

## 12. ANNEX 2 (TRANSLITERATION TABLES)<sup>71</sup>

In the following tables the transliterated characters (that is to say those to be used instead of the original characters) are given in upper-case only. If descriptive data (see 8.2) is encoded using both upper- and lower-case (see 5.4.12), the transliterated characters may of course be used in both upper- and lower-case as well.

### 12.1. Symbols

€	is written as	EUR
---	---------------	-----

### 12.2. French

ç	is written as	C
---	---------------	---

œ	is written as	OE
---	---------------	----

All accents are left out.

### 12.3. Italian

All accents are left out.

### 12.4. German and Estonian

ä, Ä	is written as	AE
------	---------------	----

ö	is written as	OE
---	---------------	----

ü	is written as	UE
---	---------------	----

ß	is written as	SS
---	---------------	----

### 12.5. Icelandic

ð, Ð	is written as	D
------	---------------	---

æ	is written as	AE
---	---------------	----

þ, Þ	is written as	TH
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<sup>71</sup> Copied from Manuel d'utilisation d'ADONIS au sein d'ECHO, version du 28/07/2003, entrée en vigueur le 15/10/2001.

ö is written as OE

The accents on **á, é, í, ó, ú,** and **ý** are left out.

#### 12.6. Nordic languages

æ is written as AE

ø is written as OE

å is written as AA

ä is written as AE

ö is written as OE

All accents are left out.

#### 12.7. Slavonic languages that use the roman alphabet

The hacek (for example š) above **c, C, r, R, s, S, z, Z** and after **d, k, l, t** is left out.

#### 12.8. Spanish

ñ is written as N

The accents on **á, é, í, ó, ú** and **ü** are left out.

## 12.9. Greek alphabet

Greek		Roman
α	A	A
αυ	AY	AV*, AF**
β	B	V
γ	Γ	G
γγ	ΓΓ	NG
γξ	ΓΞ	NX
γχ	ΓΧ	NCH
δ	Δ	D
ε	E	E
ευ	EY	EV*, EF**
ζ	Z	Z
η	H	I
ηυ	HY	IV*, IF**
θ	Θ	TH
ι	I	I
κ	K	K
λ	Λ	L
μ	M	M
μπ	MΠ	B***, MP****
ν	N	N
ξ	Ξ	X
ο	O	O
ου	OY	OU
π	Π	P
ρ	P	R
σ, ς	Σ	S
τ	T	T
υ	Y	Y
φ	Φ	F
χ	X	CH
ψ	Ψ	PS
ω	Ω	O

All accents are left out.

Notes:

- \* Before all vowels and before the consonants  
**β, γ, δ, ξ, μ, ν, ρ**
- \*\* At the end of the word and before the consonants  
**θ, κ, ζ, π, σ, τ, φ, χ, ψ**
- \*\*\* at the beginning of the word
- \*\*\*\* in the middle of or at the end of the word

**12.10. Cyrillic alphabet**

Cyrillic		Used in						ADONIS
Printed		Russian	Ukrainian	Byelo-russian	Serbian	Macedonian	Bulgarian	
a	А	x	x	x	x	x	x	A
б	Б	x	x	x	x	x	x	B
в	В	x	x	x	x	x	x	V
г	Г	x			x	x	x	G
г	Г		x	x				GH
д	Д	x	x	x	x	x	x	D
ђ	Ђ				x			DJ
ѓ	Ѓ					x		G
e(ë)	Е(Ë)	x	x	x	x	x	x	E
є	Є		x					JE
ж	Ж	x	x	x	x	x	x	ZH
з	З	x	x	x	x	x	x	Z
s	С					x		DZ
и	И	x	x	x	x	x	x	I
і	І		x	x				I
ї	Ї		x					II
ј	Ј				x	x		J
й	Й	x	x	x			x	J
к	К	x	x	x	x	x	x	K
л	Л	x	x	x	x	x	x	L
љ	Љ				x	x		LJ
м	М	x	x	x	x	x	x	M
н	Н	X	x	x	x	x	x	N
њ	Њ				x	x		NJ

о	О	x	x	x	x	x	x	O
п	П	x	x	x	x	x	x	P
р	Р	x	x	x	x	x	x	R
с	С	x	x	x	x	x	x	S
т	Т	x	x	x	x	x	x	T
ћ	Ћ				x			CJ
ќ	Ќ					x		K
у	У	x	x	x	x	x	x	U
ђ	Ђ			x				W
ф	Ф	x	x	x	x	x	x	F
х	Х	x	x	x	x	x	x	KH
ц	Ц	x	x	x	x	x	x	TS
ч	Ч	x	X	x	x	x	x	CHI
џ	Џ				x	x		DZ.
ш	Ш	x	X	x	x	x	x	SHE
щ	Щ	x	X				x	SHCH
ъ	Ъ	x	X	x			x	"
ы	Ы	x		x				Y
ь	Ь	x	X	x			x	'
э	Э	x		x				EH
ю	Ю	x	X	x			x	YU
я	Я	x	X	x			x	YA