



SHIFT2RAIL JOINT UNDERTAKING DOCUMENT MANAGEMENT POLICY

Version 2.0

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1. Introduction

As stated in the internal control standards (ICS) rules of the Shift2Rail Joint Undertaking (S2R JU) adopted on 08/04/2016, and in particular the ICS 11-Document management rules, the S2R JU document management systems and related procedures should comply with relevant compulsory security measures, provisions on document management and rules on protection of personal data.

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

The DMP covers all paper, born-digital and electronic documents, as drawn up or received by S2R JU and belonging to its documentary resources and the procedures managed by the IT systems.

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

After the necessary staff training and enough experience gained on the new tool in production, S2R JU DMP has been revised in order to ensure that correct and consistent implementation of the document management process is ensured.

2. Purpose

S2R JU DMP is aligned with the EC Implementing rules on document management and electronic and digitised documents¹, with other relevant procedures and existing internal documentation (i.e. Manual of Financial Procedures etc.) and IT tools (ABAC tools, H2020 tools, EMI, etc.) which may include the treatment of documents in all their aspects.

The purpose of this document is to define:

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

¹ Commission Implementing Rules for Decision 2002/47/EC, ECSC, Euratom and Decision 2004/563/EC, Euratom of 30 November 2009 (SEC(2009)1643)

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

In order to ensure full compliance with those principles, the JU is applying by analogy the Commission General implementing rules on document management² and electronic and digitised documents³, available in **Annex 1** of this document.

2. The rules of document management for documents not covered by the registration requirement and other provisions specific to the JU, such as:
 - File management for working documents (organization structure of the S2R JU shared-drive, physical documents)
 - Access policy and confidentiality
 - Version control, naming convention of individual files
 - Corporate design (formatting, layout, logo)
 - Archiving procedures (Shared drive and IT tools)

3. Organisation and structure

The documentation management system of the S2R JU consists of:

1. ARES Tool and NOMCOM;
2. System generated and uploaded digital documentation available in IT tools used by the JU (ABAC systems, SyGma/Compass, EMI, etc.);
3. Paper archives of physical documents – Shared Drive.

The ARES Tool as main repository system for document registration and filing and other System repositories against less paper and possibly shared drive storage are always considered.

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

3.1 Document Management Committee (DMC)

A Document Management Committee (DMC) composed of the Head of Administration and Finance, the Head of Research and Innovation, the Assistant to the Executive Director and the DMO(s) governs the Document Management Policy.

The DMC shall meet twice per year to discuss the evolutions and the implementation of the DMP with the S2R JU, and where necessary, propose updates. Based on the outcome of the meetings, the DMP can be updated and submitted for approval to the Executive Director on a yearly basis. Any updates shall be communicated to the staff.

² Decision 2002/47/EC, ECSC, Euratom

³ Decision 2004/563/EC, Euratom

Any staff member may submit proposal to the Assistant to the Executive Director who will submit them to the DMC.

3.2 Filing plan

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

The aim of the filing plan is:

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

The filing plan is divided into a pre-defined nomenclature and is available in **Annex 2** of this document. The S2R JU filling plan is integrated into the Commission Common nomenclature s filing plan updated in 2013.

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

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

3.3 Organisation units – Lead departments

The responsibilities inherent to:

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

Is defined by the structure of S2R JU Organisation units:

(a) **S2R:** Executive Director and Governance
Responsible: Assistant to the Executive Director

(b) **S2R.1:**

a. Communication

Responsible: Assistant to the Executive Director

b. Human Resources

Responsible: HR Assistant

(c) **S2R.2:** Research and Innovation
Responsible: Head of Research and Innovation

(d) **S2R.3:** Administrative and Finance
Responsible: Head of Administration and Finance

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

4. Document management and registration

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

In addition to rules applicable in ARES of filing and the keeping of the JU's files (II.3), of the preservation of the JU's files (II.4 and S2R JU Retention list in **Annex 3**), of the appraisal and transfer of files to the Historical archives (II.5), and of the electronic and digitised documents (III), the main principle consist in identifying the documents to be registered (II.2).

Documents to be registered are all documents, regardless of the medium (also including emails), that:

- (a) are received or formally drawn up by S2R JU in the course of its activities;
- (b) either are likely to require action, follow-up or a reply from S2R JU or involve the responsibility of the S2R JU
- (c) may have legal, financial, HR implications
- (d) contain important information which is not short-lived.

Documents that are drawn up as effective administrative or legal evidence of decisions, situations, intentions or events linked to the activities of S2R JU must also be registered.

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

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

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

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

5. Other documents

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

Important and not short-lived are criteria subject to subtle judgment that will vary with the content and context of the document. Documents containing information which is unimportant and short-lived are, in contrast, documents:

- whose loss would not prevent the sectors concerned to meet S2R JU's administrative or evidential needs;
- whose value is clearly temporary and rapidly lapsing, ancillary and instrumental;
- which are considered or treated as unimportant and short-lived by a records schedule, a procedural regulation or routine administrative practice.

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

This section will cover the internal rules that apply when a document is not archived in ARES but in the S2R JU shared drive.

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

Rule 1:

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

Rule 2:

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

Rule 3:

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

Rule 4:

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

Rule 5:

For internal correspondence, **send links to the folders (not to the document itself) where they exist** instead of attaching them to e-mail.

Rule 6:

Respect the process based structure of the shared drive and do not structure it for personal convenience. Instead use **short-cuts**, for example on your personal desktop, if the

documents & folders you access frequently are very dispersed on the shared drive. If in doubt, always consult a member of the Document Management Committee (DMC).

Rule 7:

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

5.1 Structure and design of the Shared Drive

The structure and design of the shared drive is based as much as possible on the Shift2Rail JU filing plan in ARES.

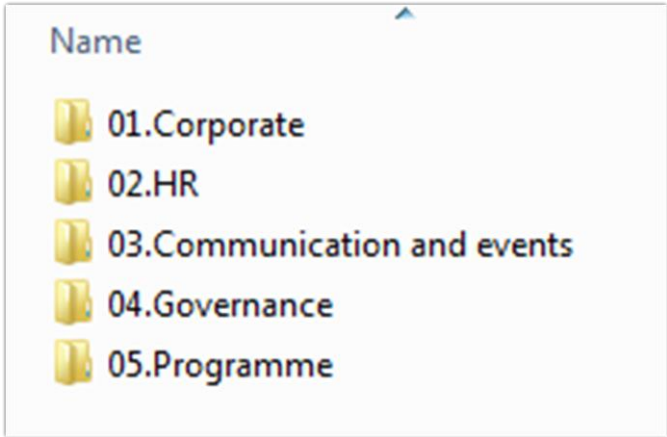
With few exceptions, the first 3 levels of the Shared Drive are fixed and no circumstances additional folders should be created at these top levels without agreement from the Document Management Committee.

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

5.2 Placing and finding documents

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

- **First Level**



5.3 Sub-folders

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

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

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

YYYYMMDD – Short descriptor (- meeting number)

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

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

01 – Meeting Preparation

02 – Meeting Documents

[03 – Reimbursements] *(when applicable)*

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

The following important aspects must always be taken into consideration when working on internal documents.

5.4.1 Naming convention of individual documents

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

- Name must be given in relation to the type, scope and object of the document.
- The name must be short and if possible use predefined acronyms: AWP (Annual Work Plan), MAAP (Mulit-Annual Action Plan), etc.
- If it is a working document it must contain the version nr. and the last contributors' initials (Example: AWP 2017_20161110_v07_draft_CMB)

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

1. Descriptor

This is the element which describes the purpose of the document and should use predefined acronyms where possible.

2. Version Number and initials

This should always begin with the date (YYYYMMDD format), a small “v” followed always by a digit, the document status (draft/final/etc.) and the staff member initials (three letters for internal drafting) – always separated by underscores (no use of space).

A document which is not expected to evolve or is a baseline extract of data should be called v00. All other documents start at v01.

Examples:

<i>Monthly report data_v00_20170105_VD</i>	Data extracted – baseline for the v1 document creation
<i>AWP18_20161205_v09_draft_CMB</i>	AWP 2018 edited for the 9 th time by CMB
<i>AWP18_20161205_v10_Final</i>	Final version for publication (see next chapter)

3. Version Text

Optionally a short text can be inserted to indicate the usage of the document (e.g. “sent to GB” or one of a number of predefined categories such as “Draft”, “Final”, “Published”)

By following the above naming convention, the list of documents will be “auto-sequencing” when viewed on the shared drive.

Documents should also have a Revision History tables which maps to the version number of the files. This table can contain more information about what was changed in the document, by whom, etc.

5.4.2 Version control

With regard to the version control policy in the S2R JU, a few simple but key rules must be applied in order to facilitate an efficient process for establishing documents as required by the S2R JU Regulation.

Internally drafted documents basic rules:

- Use the share drive as a working place for documents; otherwise the “latest” version is not visible.
- If you need to work on a shared document off-line (e.g. at home), then take a copy and update the name on the shared drive to indicate this to prevent other people editing it in parallel thereby creating divergent content and non-sequential versions. The version on the shared drive therefore becomes a reference only /place marker until the updated /new version from on-line (home/mission) working is put back on the shared drive.
- Use a version number (v01) and your initials in the file name as described in the section on file naming and maintain a matching version log table in the document.
- Use the track changes option in Word.
- Always send the link by email to other colleagues that have to work on the same document. Make sure they follow the same process. Otherwise multiple and divergent copies of the same document will be created.
- Once finalized internally, the document is released with version text (“Final”, “published”, etc.).

External documents basic rules:

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

6. "Confidentiality" policy

This section does not cover EU Classified Information but S2R JU Restricted documents, whose access shall be limited due to their content, such as personal data, commercial in confidence information, CDR and evaluation reports, procurement documents not yet decided, etc. hereinafter "confidential data". The document originator or receiver may consider where appropriate to stamp this documents with a red stamp "S2R Restricted" in ARES.

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

6.1 Mail

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

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

As far as possible and with the exclusion of personal communication related to S2R position, no personal mail or packages shall be received by staff in the S2R premises.

6.2 Confidential Post

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

6.3 Document Confidentiality Statement

If confidential material is being drawn up by JU staff, the document must duly identified as “S2R Restricted” in red capital letters and contain the following sentence in the footer:

‘The information in this document is confidential to the person to whom it is addressed and should not be disclosed to any other person. It may not be reproduced in whole, or in part, nor may any of the information contained therein be disclosed without the prior consent of the S2R JU. A recipient may not solicit, directly or indirectly (whether through an agent or otherwise) the participation of another institution or person without the prior approval of the S2R JU.

Any form of reproduction, dissemination, copying, disclosure, modification, distribution and or publication of this material is strictly prohibited.’

7. Standard Templates

To ensure standardization there is an approved set of templates for saved in defined locations accessible to all staff: R:\01.Corporate\06. Secretariat\01. Document Management\Templates. Staff shall use these templates as needed. Some templates include model text (yellow) and guidelines.

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

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

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

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

9. Public access to JU documents

S2R JU Regulation (Article 6) states that Regulation (EC) No 1049/2001 of the European Parliament and of the Council (4) shall apply to documents held by S2RJU and that S2R JU shall adopt practical arrangements for implementing this Regulation.

In this sense, S2R JU has adopted practical arrangements for implementing Regulation (EC) No 1049/2001⁴. In principle, the widest possible access to documents should be ensured, subject to the principles, conditions and limits defined in Regulation (EC) No 1049/2001.

⁴ Decision of the S2R JU Governing Board n° 22/2015 of 11/12/2015 : <https://shift2rail.org/about-shift2rail/structure-of-shift2rail-initiative/governing-board-2/>

10. Right of access to personal data

This document management policy shall be interpreted without prejudice to the right of individuals to have access to personal data concerning them as stipulated in relevant Union legislation, in particular Regulation (EC) No 45/2001 on the protection of individuals with regard to the processing of personal data, which will be replaced by a new Regulation as from 12 December 2018⁵.

11. Final remarks

In case of doubts in the interpretation of this policy, the matter shall be referred to the DMC possibly through the Assistant of the ED or submitted to the attention of the Legal Officer of S2R JU.

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

- Rules of procedure and public access to documents, in particular Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.
- Security and personal data protection rules.
- EU Classified information and any other relevant regulation on the matter.
- Code of good administrative behaviour.
- EU Financial Regulation and the S2R JU Financial Rules

⁵ Proposal (COM (2017)8) for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Annex 1. Commission Implementing Rules for Decision 2002/47/EC, ECSC, Euratom and Decision 2004/563/EC, Euratom of 30 November 2009.

Annex 2. S2R JU Filing Plan

Annex 3. S2R JU Retention List