Retention and Disposal of Digital Records at the ECB: Experience & Way Forward

CEMLA – Banco de España Seminar
Madrid, 12 September 2019

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European Central Bank
1. Background
The ECB & DARWIN

2. ECB Retention Journey
Retention implementation in DARWIN

3. Records disposition
Disposition of digital records

4. The way forward
Planned activities

5. Conclusions
Some reflections
A bit of background...

1998 – Frankfurt am Main
25 business areas
c. 3,500 staff

At the heart of the Eurosystem and the Single Supervisory Mechanism

European Central Bank

A knowledge organization

Information is key to prepare decisions and perform our assigned tasks
The importance of Information Governance for the ECB Corporate Governance is reflected in the Organisational Chart

- ECB President
- Directorate General Secretariat (DG/SE)
- Compliance and Governance Officer (CGO)
- Compliance and Governance Division (CGO)
- Information Governance Division (IGO)
- Secretariat Division (SEC)
- Information Governance Policies
- Knowledge Solutions
The two sections cover two aspects of Information Governance: **Policies and Knowledge Management**

**Information Governance**
- **Information Governance Policies**
  - Archives & Records Mgmt
  - Policy Development

**Knowledge Solutions**
- Library
- Information Mgmt Solutions
- Acquisitions

Focus on Governance/ Policies / Internal Processes
Focus on User Experience/ Knowledge Management / Innovation
DARWIN: Documents And Records Web-based Information Network since 2007

23,500 users

7,100 ECB users
16,400 Non-ECB users

15,900,000 Managed content (documents, emails)

3,800 collaboration tools
wikis, portals, blogs, discussion fora
DARWIN – The ECB key solution

For the user
- Document creation
- Collaboration
- Knowledge Pool

For the organisation
- Institutional Memory
- Accountability & transparency
- Legal compliance

Documents Management
- Documents
- E-mails
- Digital media
- Versioning
- Reserving
- Alerts
- Wikis
- Blogs
- Chats

Workflows
- Task lists

Search

Access
- rights
- Audit trails

Reporting

Declaration and disposal of records

ECB Filing & Retention Plan

Physical items management

Records Management
The ECB retention journey
The ECB Filing & Retention Plan defines our retention rules

To keep only what we need

01 To serve current & future business needs

02 For historical & research purposes

03 To ensure legal compliance
   • EU regulation 2018/1725 on data protection
   • Council Regulation 354/83 on historical archives in EU institutions
A functional approach for the ECB Filing and Retention Plan

2008 – 1\textsuperscript{st} approval

2014 & 2017 – Major reviews

Ongoing review

10 retention periods

From 3 months to Permanent

- Business analysis
- Benchmarking with peer organisations

- 4-level hierarchical structure
- 13 top-level classes
- Administrative & Operational functions
# The ECB Filing & Retention Plan in detail

<table>
<thead>
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<td>Digital</td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td>10.1.1.5</td>
<td>BAs' contributions</td>
<td>Digital</td>
<td>T - End of calendar year</td>
<td>5 years (D)</td>
</tr>
</tbody>
</table>

Covers the Eurosystem’s statutory duties in the area of financial stability and supervision (Art. 105.5 of the Treaty)

Includes compliance function (i.e., ensuring the harmonised implementation of ECB legal acts and administering the ECB’s sanctioning power in cases of non-compliance) as well as consultative function (i.e., advising on draft legislative provisions from the Community / Member States). Case files shall be filed according to the specific topic at issue.

[www.ecb.europa.eu](http://www.ecb.europa.eu)
Apply the ECB retention policy to documents stored in DARWIN so that they are automatically disposed or preserved
The retention approach in DARWIN

- The retention plan is integrated in DARWIN
- Retention periods are directly applied to folders in business workspaces
- The system automatically performs retention activities
- Reports for final disposition of records are created for approval
Retention triggers in DARWIN

- **Time trigger** – Finalisation of individual documents (via ad hoc DARWIN functionality)
- **Document based** retention
- **Automatic** finalisation 2 years after last editing action

**Time-based activities**
(ongoing, no end-date)

Calculation of retention periods from last editing

- **Event trigger** – Finalisation of folders
- **Folder based** retention
- **Manual** finalisation

**Event-based activities**
(clear start & end-date)

Calculation of retention periods from finalisation date of folders
Phases of retention implementation in a business area

**Kick-off**
- Explain process
- Assign resources

**Prepare**
- Discuss & agree retention periods

**Approve**
- Approve agreed retention periods

**Implement**
- Adjust folder structures
- Assign retention periods

**Activate**
- Activate retention functionalities
The disposition process
The disposition process

Verify retention
Create disposition reports
Request approval
Check & approve
Dispose
Retention periods are verified

- To avoid incorrect retention periods on items (e.g. due to moving or for technical reasons)
- To apply possible missing retention periods on new items
- Q4 of each year
Disposition reports are created

- Disposition due date is set in DARWIN at end of the year (31 December) when the item was finalised
- DARWIN automatically generates disposition lists per workspace and per retention period
- Q1 of each year disposition reports are created from January disposition list & re-packaged based on agreed approval authorities & workspaces

Verify retention | Create disposition reports | Request approval | Check & approve | Dispose
# Example of disposition report

## Disposition Search Results for: 10Y-TIME - GMR

<table>
<thead>
<tr>
<th>NODE ID</th>
<th>NAME</th>
<th>FILE NUMBER</th>
<th>CALCULATED DATE</th>
<th>FULL LOCATION</th>
<th>REVIEW DECISION</th>
<th>ACTIONED</th>
</tr>
</thead>
<tbody>
<tr>
<td>9201596</td>
<td>table template.doc</td>
<td>02.03.01.01</td>
<td>Sun Sep 30 00:00:00 2018</td>
<td>DARWIN:DG-C:00. Administration and management - DG-C:DG-C/GMR administration and management:09 Organisational Development - GMR:Communication strategies and plans:Strategy and evaluation :Eurosystem communication plans and reviews:2008 6th review of Eurosystem communication activities:Annex 1 - central banks contribution tables</td>
<td>Approved</td>
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<td>9347167</td>
<td>Basis D%DCO_KPIs_2009(1).xls</td>
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<td>Sun Sep 30 00:00:00 2018</td>
<td>DARWIN:DG-C:00. Administration and management - DG-C:DG-C/GMR administration and management:09 Organisational Development - GMR:Communication strategies and plans:Strategy and evaluation :Key Performance Indicators</td>
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<td>No</td>
</tr>
<tr>
<td>13586931</td>
<td>20081201_Minutes06_PRC 5915_final.doc</td>
<td>02.03.02.02</td>
<td>Mon Dec 31 00:00:00 2018</td>
<td>DARWIN:DG-C:00. Administration and management - DG-C:DG-C/GMR administration and management:12 Crisis communication, business continuity and operational risk management - GMR:Manual and Training</td>
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</tr>
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<td>7397531</td>
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<td>02.03.01.01</td>
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<td>DARWIN:DG-C:00. Administration and management - DG-C:DG-C/GMR administration and management:09 Organisational Development - GMR:Work plans</td>
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<tr>
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<td>02.03.01.01</td>
<td>Sat Mar 31 00:00:00 2018</td>
<td>DARWIN:DG-C:00. Administration and management - DG-C:DG-C/GMR administration and management:09 Organisational Development - GMR:Work plans</td>
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<td>7959943</td>
<td>PAI communication activities 06Final.ppt</td>
<td>02.03.01.01</td>
<td>Sat Jun 30 00:00:00 2018</td>
<td>DARWIN:DG-C:00. Administration and management - DG-C:DG-C/GMR administration and management:09 Organisational Development - GMR:Communication strategies and plans:Strategy and evaluation :Annual activity reports:2006</td>
<td>Approved</td>
<td>No</td>
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<td>Report 2006 data 30.xls</td>
<td>02.03.01.01</td>
<td>Sat Jun 30 00:00:00 2018</td>
<td>DARWIN:DG-C:00. Administration and management - DG-C:DG-C/GMR administration and management:09 Organisational Development - GMR:Communication strategies and plans:Strategy and evaluation :Annual activity reports:2006</td>
<td>Approved</td>
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Approval to dispose is requested

- Disposition reports are sent to business areas management – as per delegation by Area Head – for check and approval
- Deadline of 1 month is granted
Example of approval workflow

Destruction Report(s)

Welcome to the Destruction Report Approval Process

You can use this form to request the approval of up to 10 destruction reports stored in DARWIN. The approver will be notified automatically via e-mail. If necessary you can set up to 10 users or groups on cc.

To initiate the process please follow these steps:

1. Select an appropriate approver for each request
2. Select the user(s)/group(s) in CC or leave the field empty if not required. Additional fields will appear when a user is selected
3. Select the source folder where the destruction reports are stored in DARWIN
4. Add the link(s) to the individual destruction reports by using the "Select" button. Buttons for additional entries will appear after a document is selected.
5. Click the "Submit Request" button.

Approver

CC users for confirmation

Source folder of linked documents in DARWIN

Deadline

Process log

Submit request
Reset
Disposition reports are checked & approved

- Delegated staff review disposition reports
- Requests to retain records are assessed
- Delegated staff approve disposition reports via workflow
- Temporary use of holds to prevent undue disposition
Records are disposed

- After approval final disposition is carried out in DARWIN
- Disposition protocol is circulated and permanently kept
- Audit deletion logs (Moreq compliant) remain in DARWIN
Example of disposition records
Records disposals in 2018 and 2019

Total destroyed
445,344 in 2018
149,204 in 2019
The way forward
The way forward

- Improve User Guidance
- Review Roles & Responsibilities
- Simplify Approval Process
Roles & Responsibilities

- New role for Archivists
- Evolution of profession
- Dedicated resources

NEW ROLE FOR ARCHIVISTS
Gradual shift of responsibility from records managers to archivists

PROFESSIONAL EVOLUTION
Upskilling to meet challenges of digital transformation

DEDICATED RESOURCES
Internal pool of staff to oversee, maintain & develop retention processes & tools
Simplified approval process

- Strict deadline
- No response equals approval
- Smoother process

- Stricter deadline
- Lack of response equals approval
- Reduce bottlenecks & delays
Improve guidance & tools

- For information professionals
- For end users
- More efficiency

**INTERNAL GUIDANCE**
- Better definition of internal processes

**END USER GUIDANCE**
- Pragmatic guidance for check of disposition reports

**IMPROVED TOOLS**
- More efficient tools to check retention settings
Conclusions
Conclusions

Effort intensive process
Effort for restructuring of workspaces during implementation & disposal process can be high

Increased compliance
ECB internal & external compliance (e.g. GDPR) is ensured

Increased user awareness
Users have become more aware of the value of their information

Ready for digital preservation
Permanent information is clearly identified for ingest into digital preservation repository

Raised IGO profile within the organisation
Any questions?
Back-up slides
2010 pilot

Aim
• Find out the effort of designing the retention schedules
• Understand how to apply them to the relevant information
• Test the process of managing the information throughout its lifecycle

Results
• Each retention schedule consisted of a very complex set of different stages
• High number of schedules to be created
• Assigning classifications and executing disposition processes required higher effort than anticipated
2012 Task Force

Need to simplify the ECB Filing and Retention Plan

Need to optimise the technical solution
2013-2014 - Preparation and planning

Streamlined retention plan

Pilot in 2 business units

Retention approach

Implementation strategy

Roles & responsibilities
## Old retention plan

<table>
<thead>
<tr>
<th>Code</th>
<th>Classes</th>
<th>Scope notes</th>
<th>Series</th>
<th>Active stage</th>
<th>Semi-active stage</th>
<th>Inactive stage</th>
</tr>
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<tr>
<td>1.1</td>
<td></td>
<td>Definition of the ECB’s institutional framework</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1.1</td>
<td></td>
<td>Policy framework</td>
<td>Involves policy issues relevant to the ECB’s institutional framework.</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Includes, inter alia, the regime for ECB legal acts, statutes, mission statements, appointments of Board members and authority to sign. This and any other official documentation representing the basis of the ECB accountability shall be filed as</td>
<td>Master files (kept in SEC) - Signed original legal documents to be preserved on paper</td>
<td>5 years</td>
<td>T</td>
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<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Local copies or convenience files (kept in BAs others than SEC)</td>
<td>5 years</td>
<td>T</td>
<td>D after relevant master file has been transferred</td>
</tr>
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<td></td>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Administrative files; notifications; transmission letters</td>
<td>3 years</td>
<td>D</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Appointment of Board members</td>
<td>5 years</td>
<td>T + 15 years</td>
<td>D</td>
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*Stages reflect paper moves*

*One classification but 4 retention periods*
# The ECB Filing and Retention Plan

## Reviewed retention plan

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- **4th level with only one retention period**
- **Trigger:** Event-based or Time-based
- **Reduction of retention periods from 50 to 9**
- **Authoritative format:** Physical or Digital