



EUROPEAN CENTRAL BANK
EUROSYSTEM

ECB-PUBLIC
FINAL

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

CEMLA – Banco de España
Seminar
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Agenda



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
ca. 3,500 staff



At the heart of the
Eurosystem and the Single
Supervisory Mechanism

European Central Bank

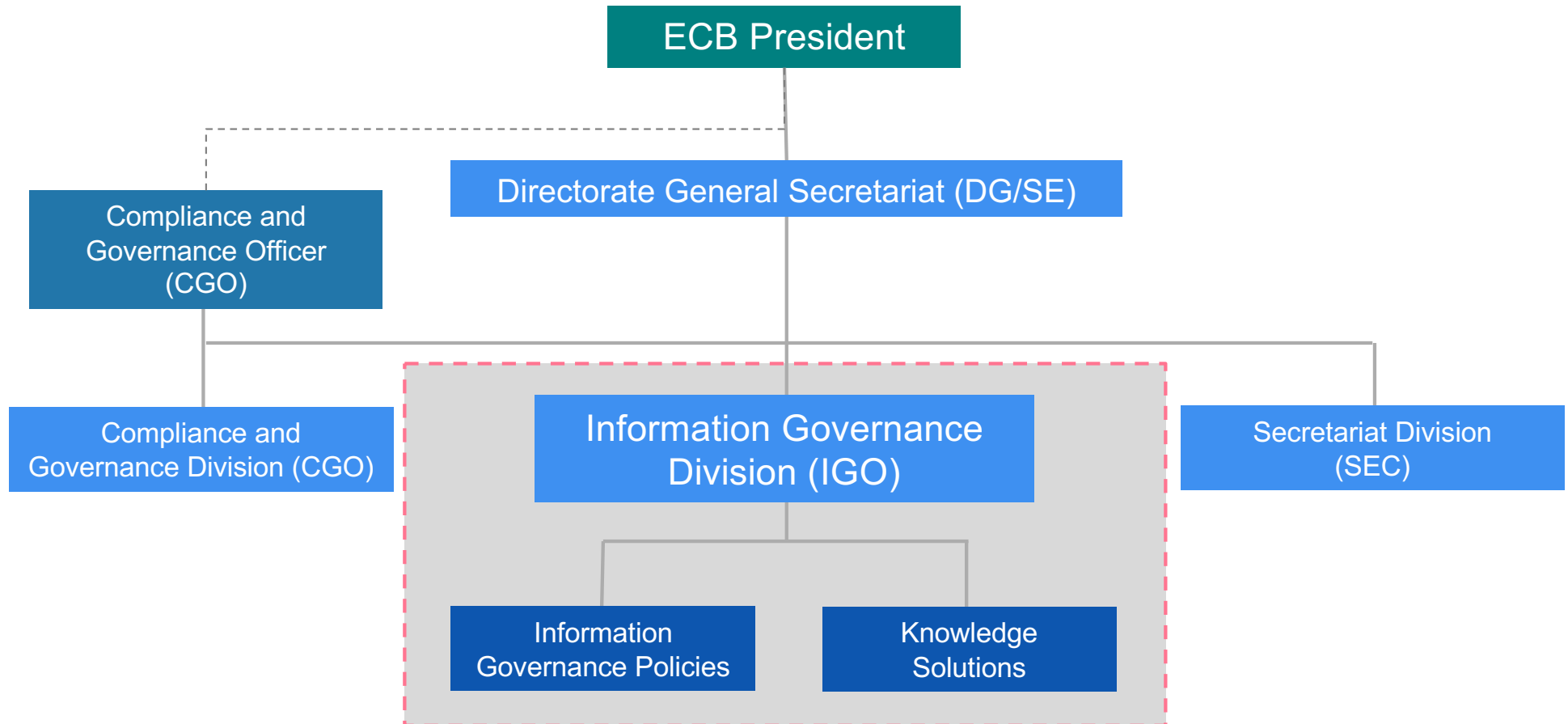


A knowledge
organization

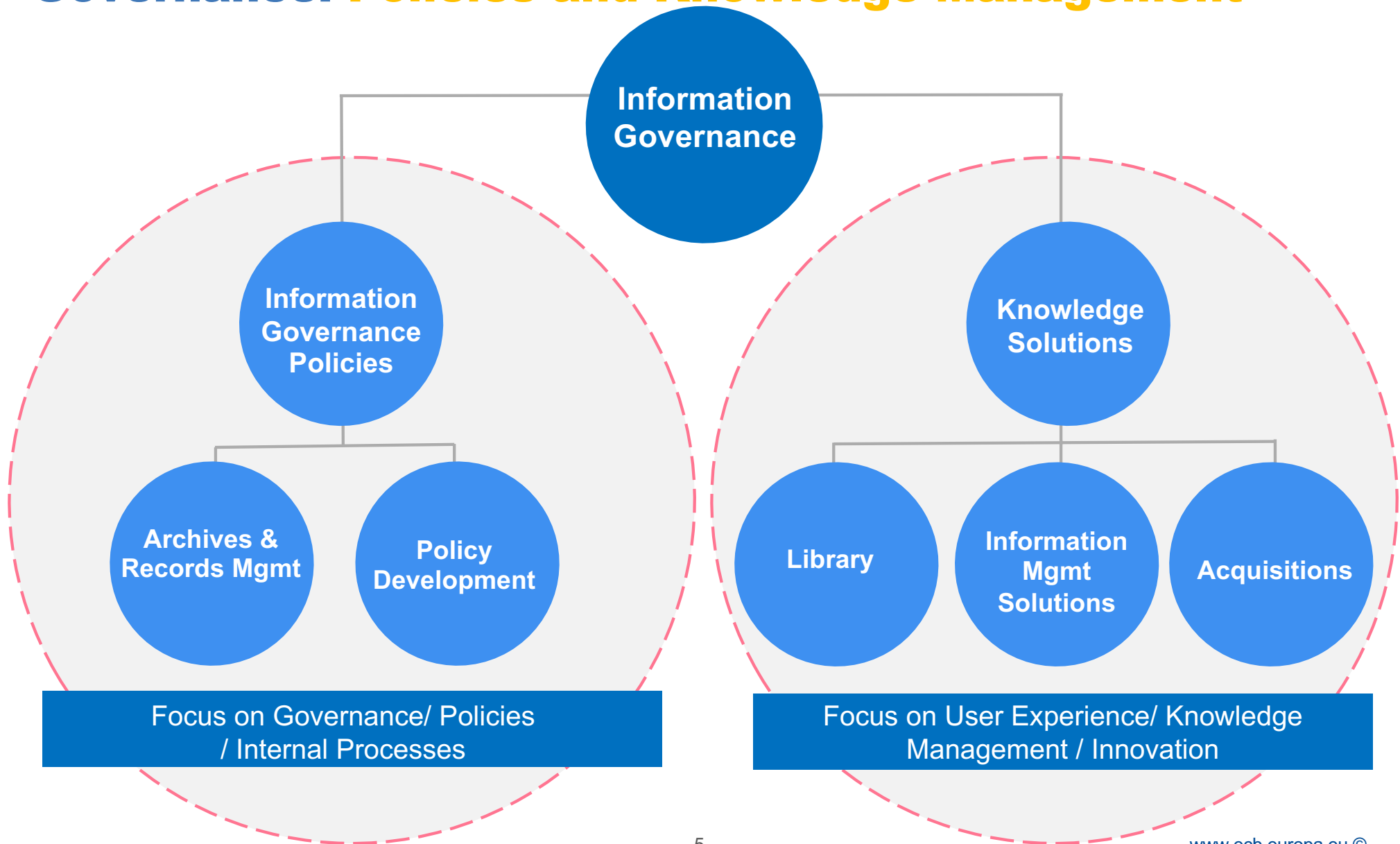
Information is key to
prepare decisions and
perform our assigned
tasks



The importance of Information Governance for the ECB Corporate Governance is reflected in the Organisational Chart



The two sections cover two aspects of Information Governance: **Policies and Knowledge Management**



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





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

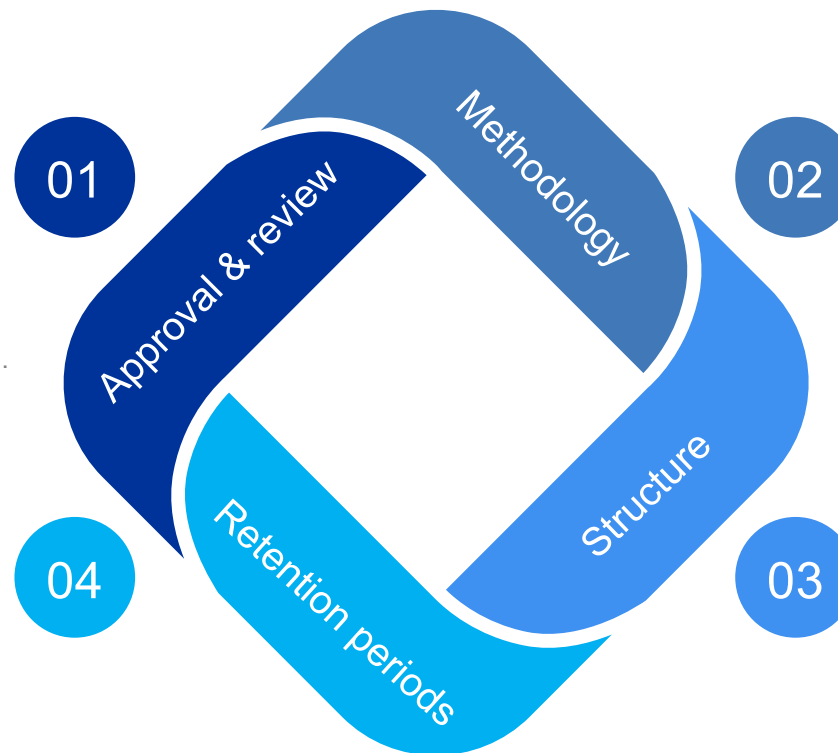
2008 – 1st approval

2014 & 2017 – Major reviews

Ongoing review

10 retention periods

From 3 months to
Permanent



Business analysis

Benchmarking with
peer organisations

4-level hierarchical
structure

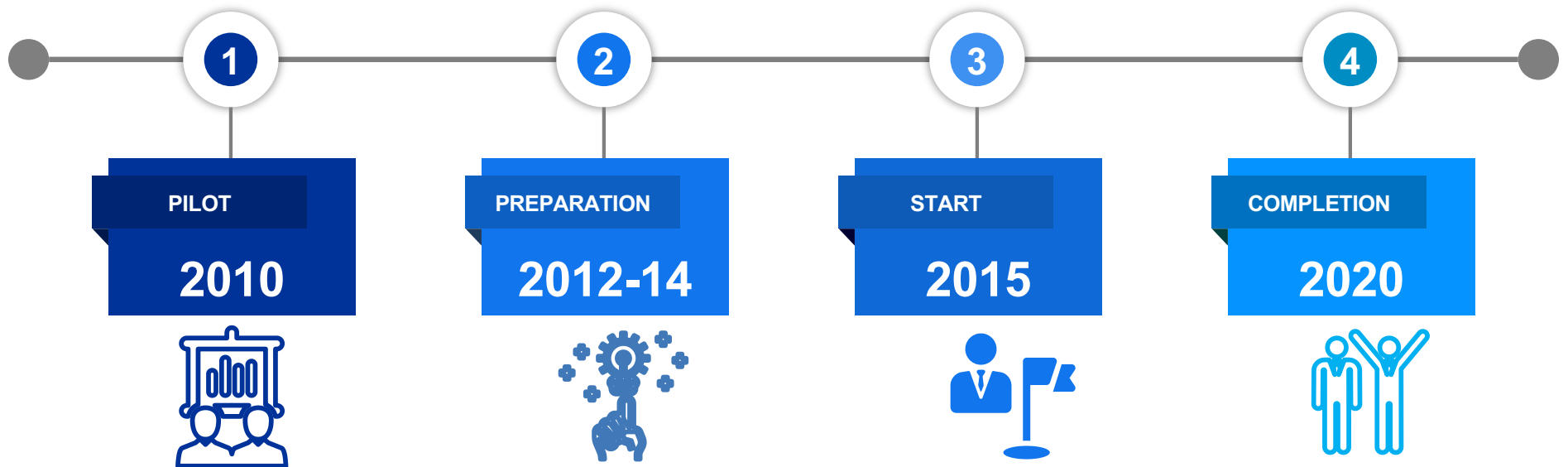
13 top-level classes

Administrative &
Operational functions

The ECB Filing & Retention Plan in detail

Class. Code	Series	Format	Retention Trigger Point	Retention Period
10	Financial stability and supervision	Retention classes		Scope notes
	<i>Covers the Eurosystem's statutory duties in the area of financial stability and supervision (Art. 105.5 of the Treaty)</i>			
10.1	General issues			
10.1.1	Legal advice on issues relevant to prudential supervision and the stability of the financial system			
	<i>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</i>			
10.1.1.1	Legal advice and supporting documentation	Digital	E - Date case is closed	15 years (D)
10.1.1.2	Legal acts (signed original on paper) and supporting documentation (in digital format)	Physical/Digital		Permanent
10.1.1.3	Compliance cases and sanctions	Digital		Permanent
10.1.1.4	Litigations with legal precedents, judicial proceedings (e.g., Court of Justice cases)	Digital		Permanent
10.1.1.5	BAs' contributions	Digital	T - End of calendar year	5 years (D)

The ECB retention journey



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

The screenshot displays the DARWIN application interface. At the top, a breadcrumb trail shows the path: DARWIN > DG-SE > Archives and records mana... > 05. DARWIN application ma... > Regular reporting on DARW... (highlighted with a red box). Below this, a navigation bar includes tabs for General, Audit, Categories, Classifications, Holds, Presentation, Provenance, Records Detail, and Refere. The main content area is divided into two columns of fields. The left column contains: Record Officer: <None>; Record Date: 7 January 2010; Status: ACTIVE...ACTIVE RECORD; Status Date: 11 June 2014; Received Date: (empty); Essential: N...NON-ESSENTIAL/NON-VITAL; Declare Record: (checkbox); Storage Medium: HYB...HYBRID; Accession: <None>; Subject: (empty). The right column contains: Records Manager Group: FUNC...; Author or Originator: (empty); Addressee(s): (empty); Other Addressee(s): (empty); Originating Organization: (empty); Update Cycle Period: (empty); Next Review Date: (empty); Last Review Date: (empty). At the bottom, a section for 'RM Classification' shows a path: IT infrastructure, premises and supplies > Information technology infrastructure, goods and services > IT systems maintenance, op... (highlighted with a red box). Below this, 'File Number' is 05.02.04 pilot.1 and 'RSI' is SY-DELETE-TIME with a 'View Details' button.

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

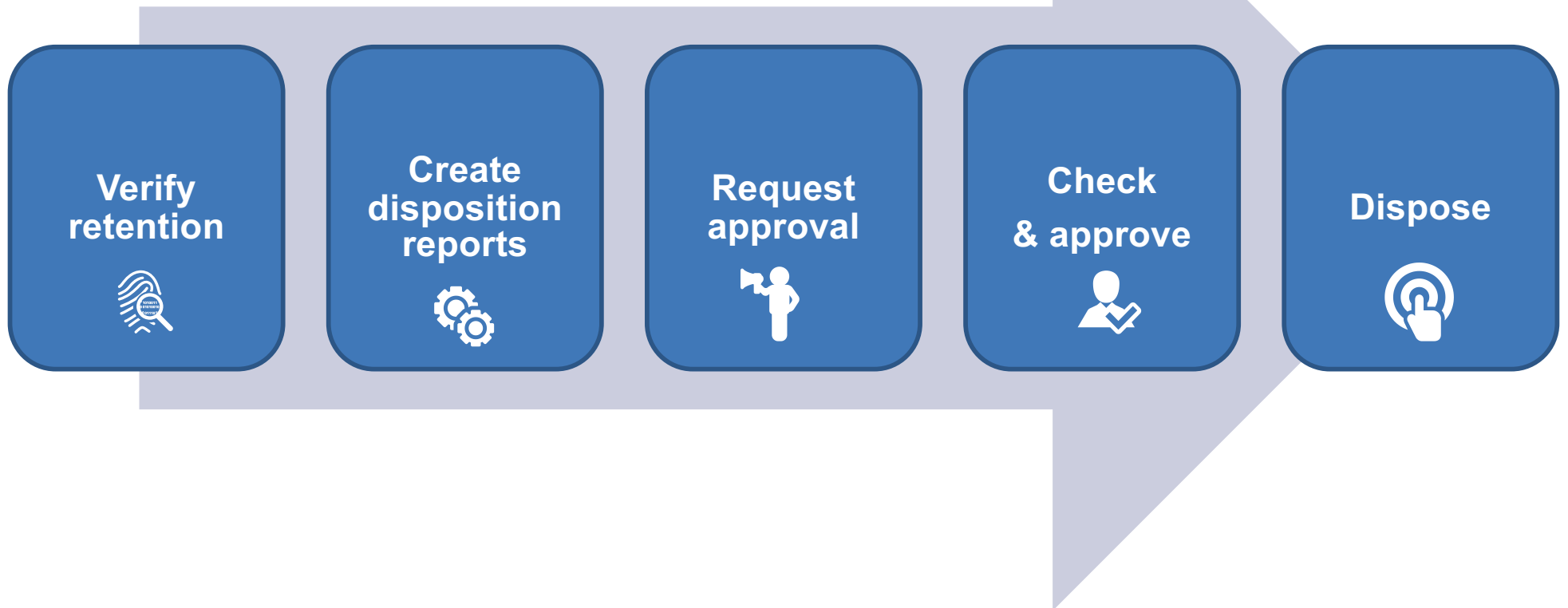
Activate

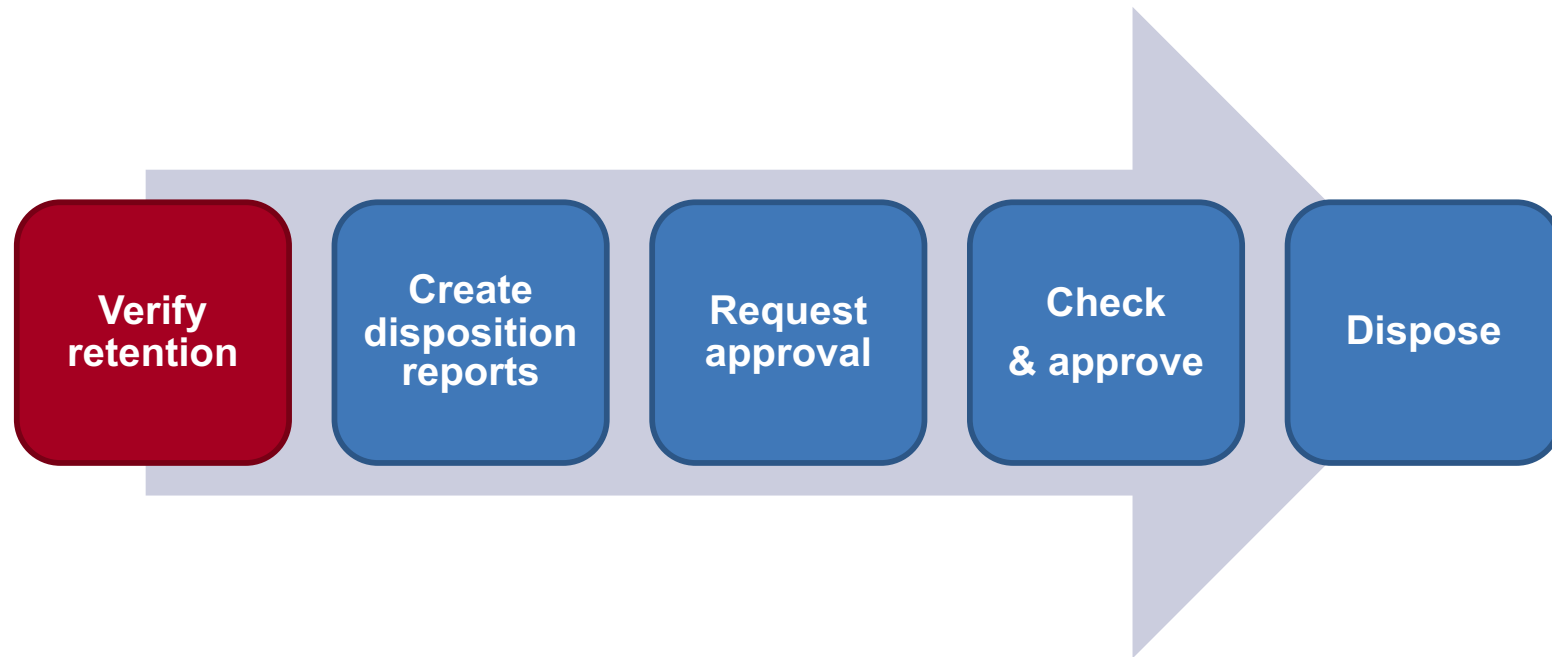
Activate retention
functionalities



The disposition process

The disposition process

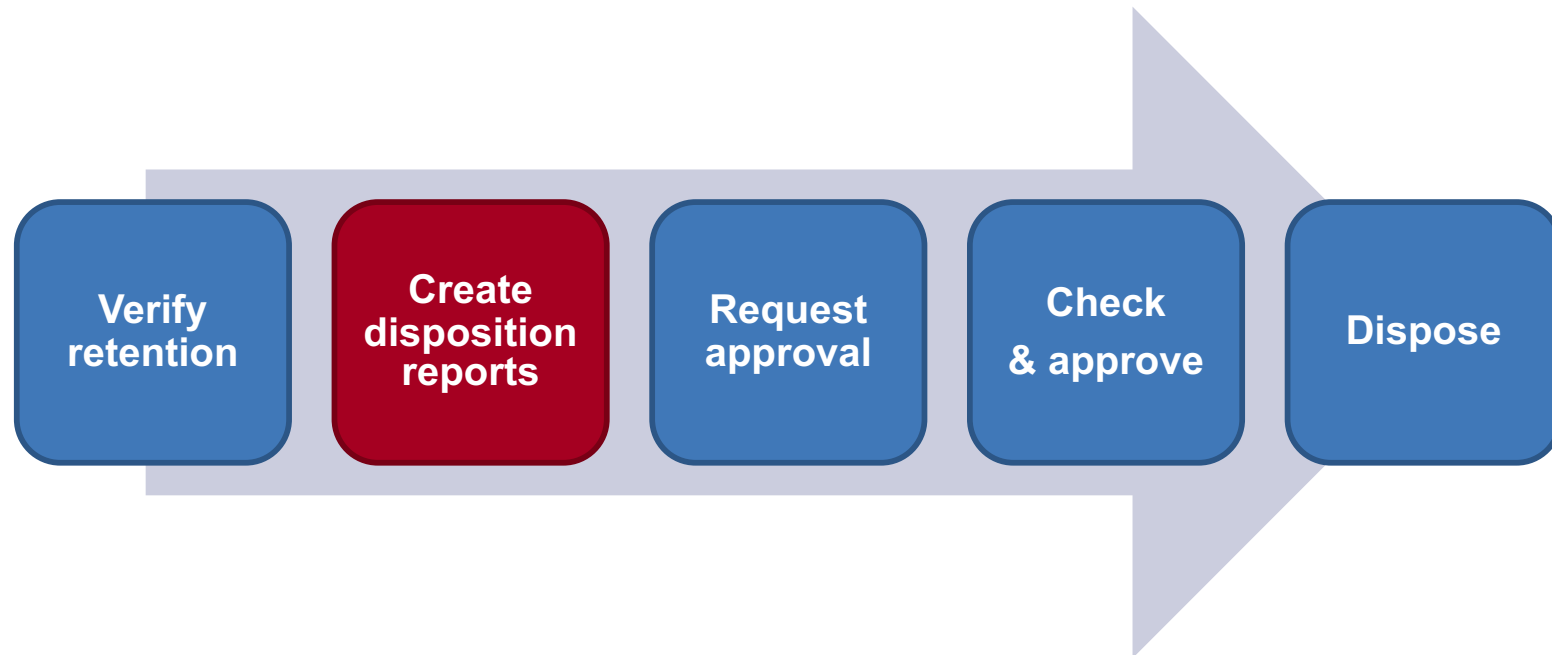




Retention periods are verified

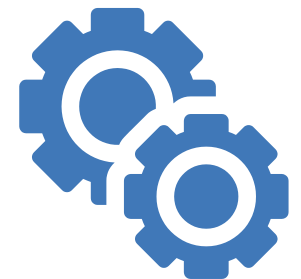
- To avoid incorrect retention periods on items (e.g. due to moving or for technical reasons)
- To apply possible missing retention periods on new items
- Q4 of each year





Disposition reports are created

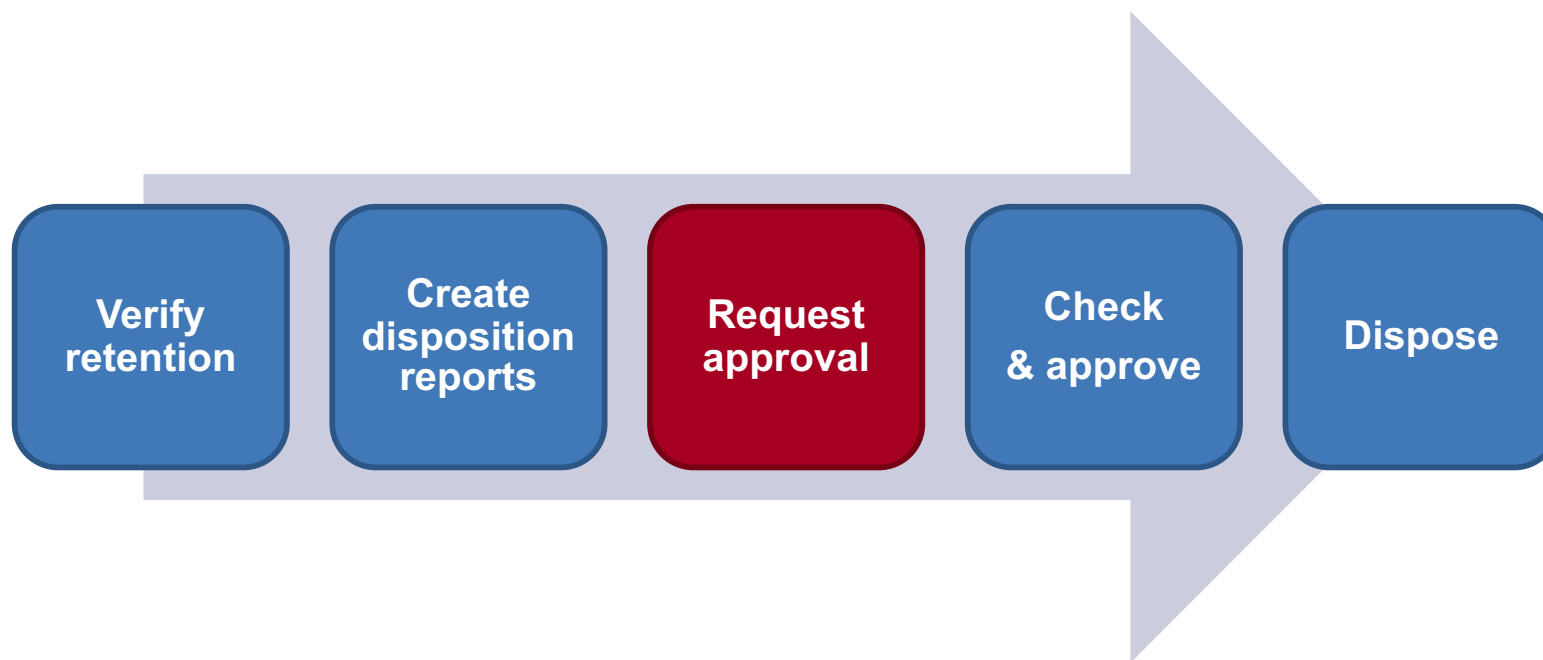
- Disposition due date is set in DARWIN at end of the year (31 December) when the item was finalised
- DARWIN automatically generates disposition lists per workspace and per retention period
- Q1 of each year disposition reports are created from January disposition list & re-packaged based on agreed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



Example of disposition report

Disposition Search Results for: 10Y-TIME - GMR

NODE ID	NAME	FILE NUMBER	CALCULATED DATE	FULL LOCATION	REVIEW DECISION	ACTIONED
9201596	table template.doc	02.03.01.01	Sun Sep 30 00:00:00 2018	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	Approved	No
9347167	Basis D%2DCO_KPIs_2009(1).xls	02.03.01.01	Sun Sep 30 00:00:00 2018	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	Approved	No
13586931	20081201_Minutes06_PRC 5915_final.doc	02.03.02.02	Mon Dec 31 00:00:00 2018	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	Approved	No
7397531	2008 Work Plan Unit 2	02.03.01.01	Sat Mar 31 00:00:00 2018	DARWIN:DG-C:00. Administration and management - DG-C:DG-C/GMR administration and management:09 Organisational Development - GMR:Work plans	Approved	No
7397936	2008 Work Plan Unit 1	02.03.01.01	Sat Mar 31 00:00:00 2018	DARWIN:DG-C:00. Administration and management - DG-C:DG-C/GMR administration and management:09 Organisational Development - GMR:Work plans	Approved	No
7959943	PAI communication activities 06Final.ppt	02.03.01.01	Sat Jun 30 00:00:00 2018	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	Approved	No
7960165	Report 2006 data 30.xls	02.03.01.01	Sat Jun 30 00:00:00 2018	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	Approved	No



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)


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 users/groups 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

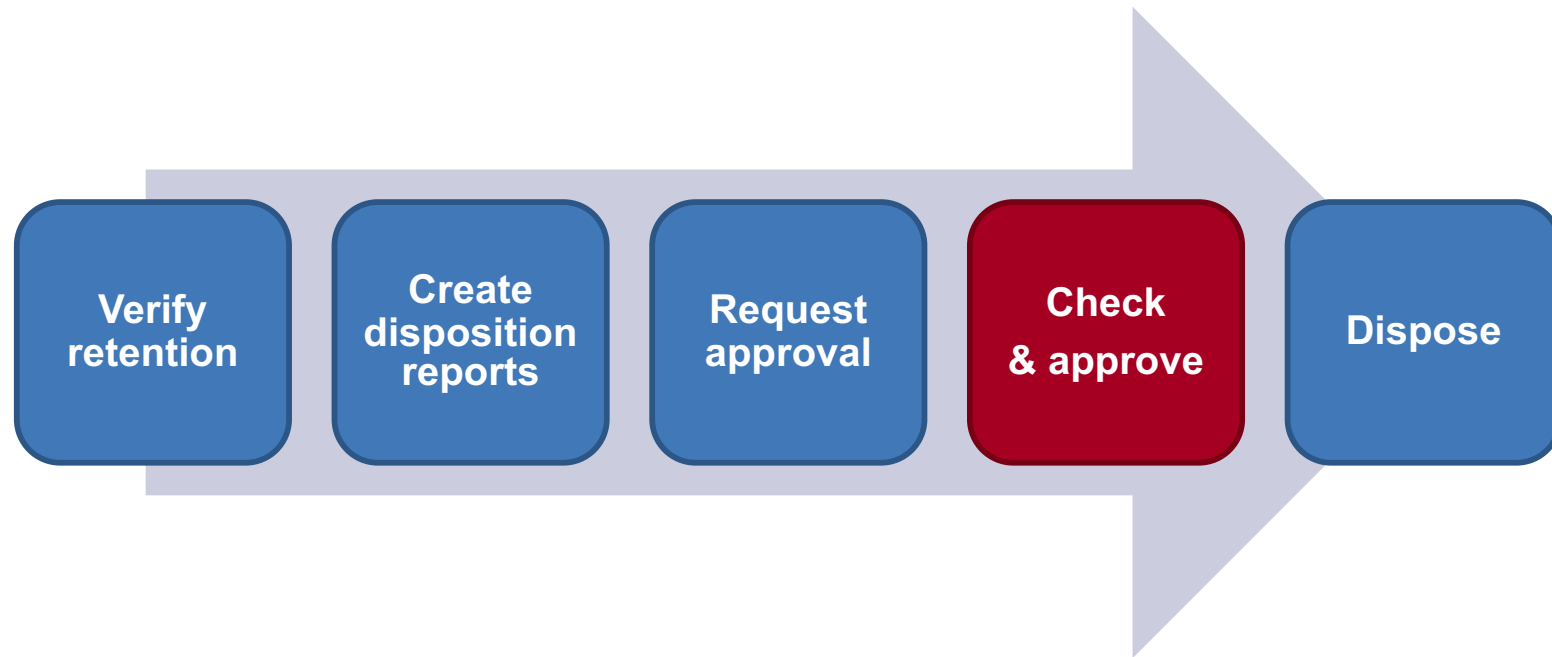
Source folder of linked documents in DARWIN 

Deadline 

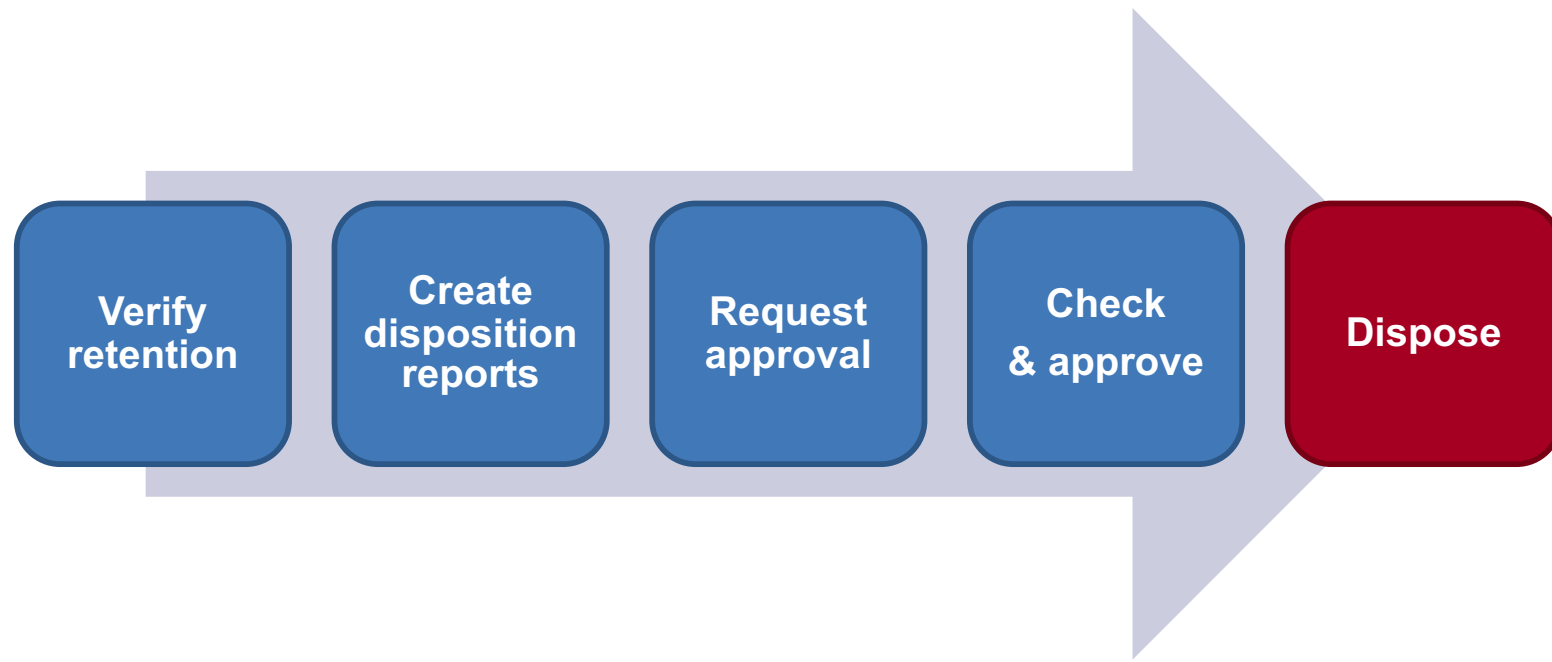
Process log



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

Deleted Item Info

Object Name:	[REDACTED].docx
Object ID:	[REDACTED] 303
Created By:	[REDACTED] 18.05.2016 19:04
File Number:	
Classification Name:	
File Name:	B-[REDACTED].docx
Record Date:	None
Status:	
Status Date:	None
Received Date:	None
Essential:	
Update Cycle Period:	
Next Review Date:	None
Last Review Date:	None
Official:	False
RSI:	
Storage:	
Disposition Authority:	
Accession:	
Subject:	
Author or Originator:	
Addressee(s):	
Other Addressee(s):	
Originating Organization:	
Delete Approved By:	
Delete Requested By:	[REDACTED] 18.05.2016 22:59
Record Officer:	
Authority:	18.05.2016 22:59
Authority Comment:	
Deleted By Disposition:	False

Close

DARWIN > DG-SE > Archives and records mana... > 10. Selection and disposi... >

Final disposal of business areas' records held in DARWIN

[List destruction reports - short](#) [Start Destruction Report Approval - short](#)

Content Filter

Filter by name

Folder View

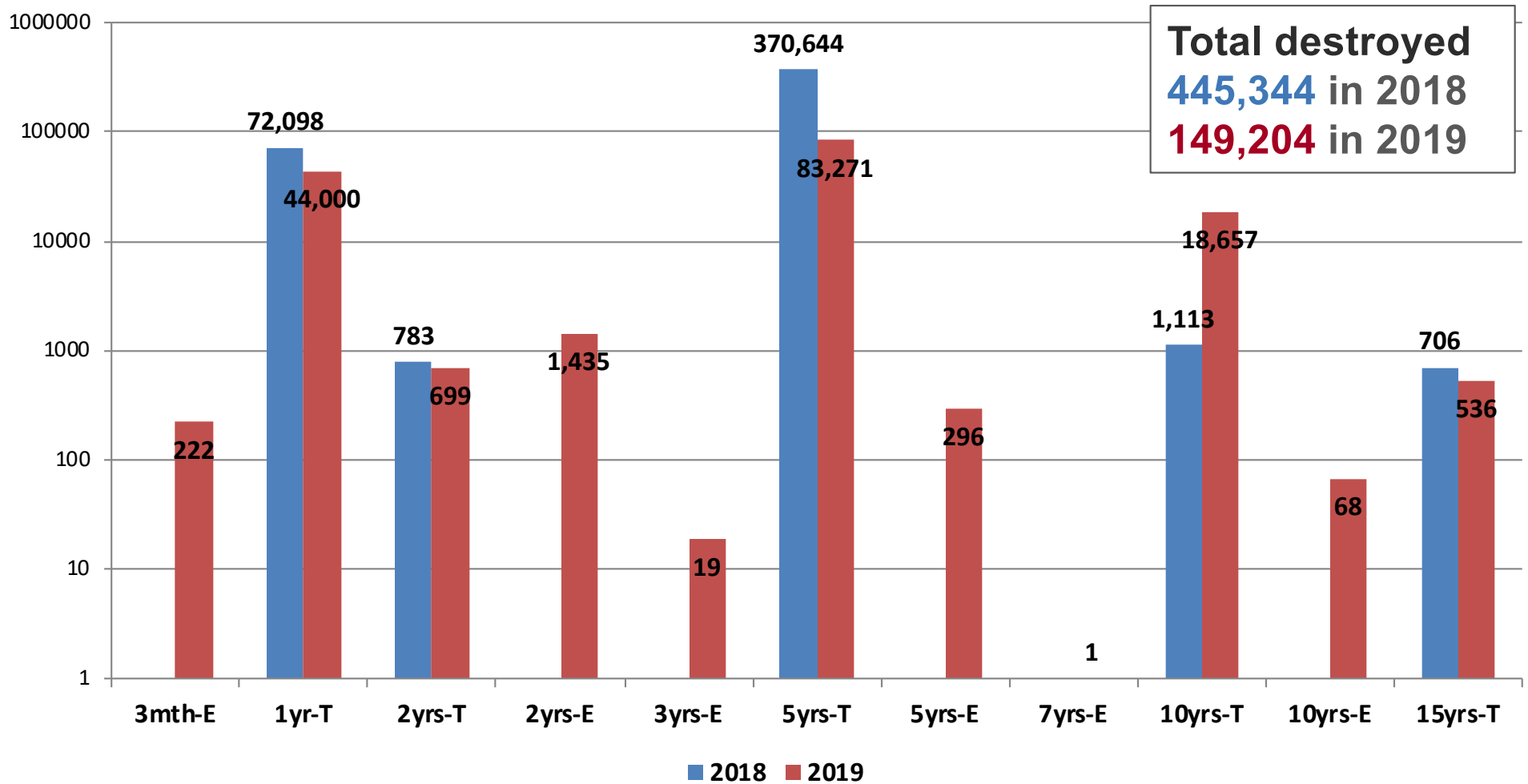
Content Type

- Document (36)
- Folder (11)
- Shortcut (7)
- URL (1)
- More...

Copy Move Delete Zip & Download Zip & E

- Type Name
- Final disposal of DG-E records held in DARWIN
- Final disposal of DG-R records held in DARWIN
- Final disposal of Re-WAS records held in DARWIN
- List destruction reports - short
- Report_Formatter_ExcelDispositionSearches.xls
- Report_Formatter_ExcelDispositionSearches.xls Shortcut
- Start Destruction Report Approval - short

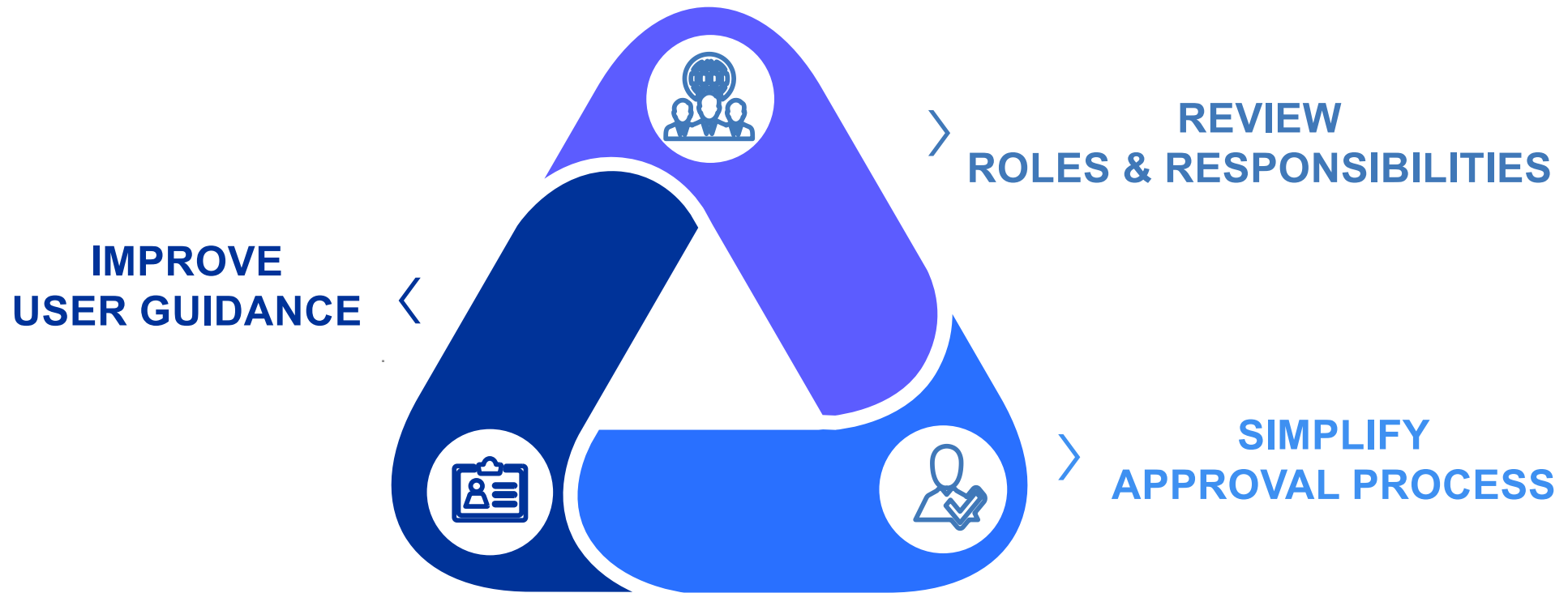
Records disposals in 2018 and 2019





The way forward

The way forward



Roles & Responsibilities

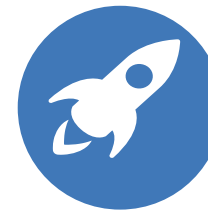
- ✓ New role for Archivists
- ✓ Evolution of profession
- ✓ Dedicated resources

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

- ✓ Stricter deadline
- ✓ No response equals approval
- ✓ Smoother process



STRICTER DEADLINE

Strict 1-month deadline



NO RESPONSE = APPROVAL

Lack of response equals approval



SMOOTHER PROCESS

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



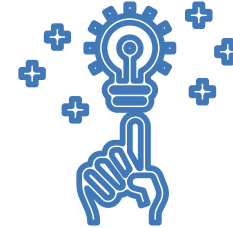
Conclusions

Conclusions



Effort intensive process

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



Increased user awareness

Users have become more aware of the value of their information



Increased compliance

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



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

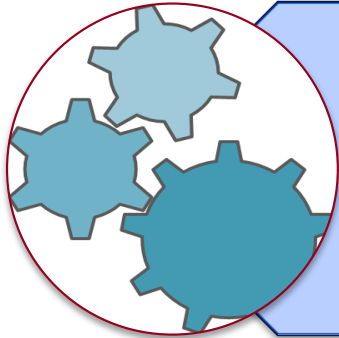
- Find out the effort of designing the retention schedules
- Understand how to apply them to the relevant information
- Test the process of managing the information throughout its lifecycle



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

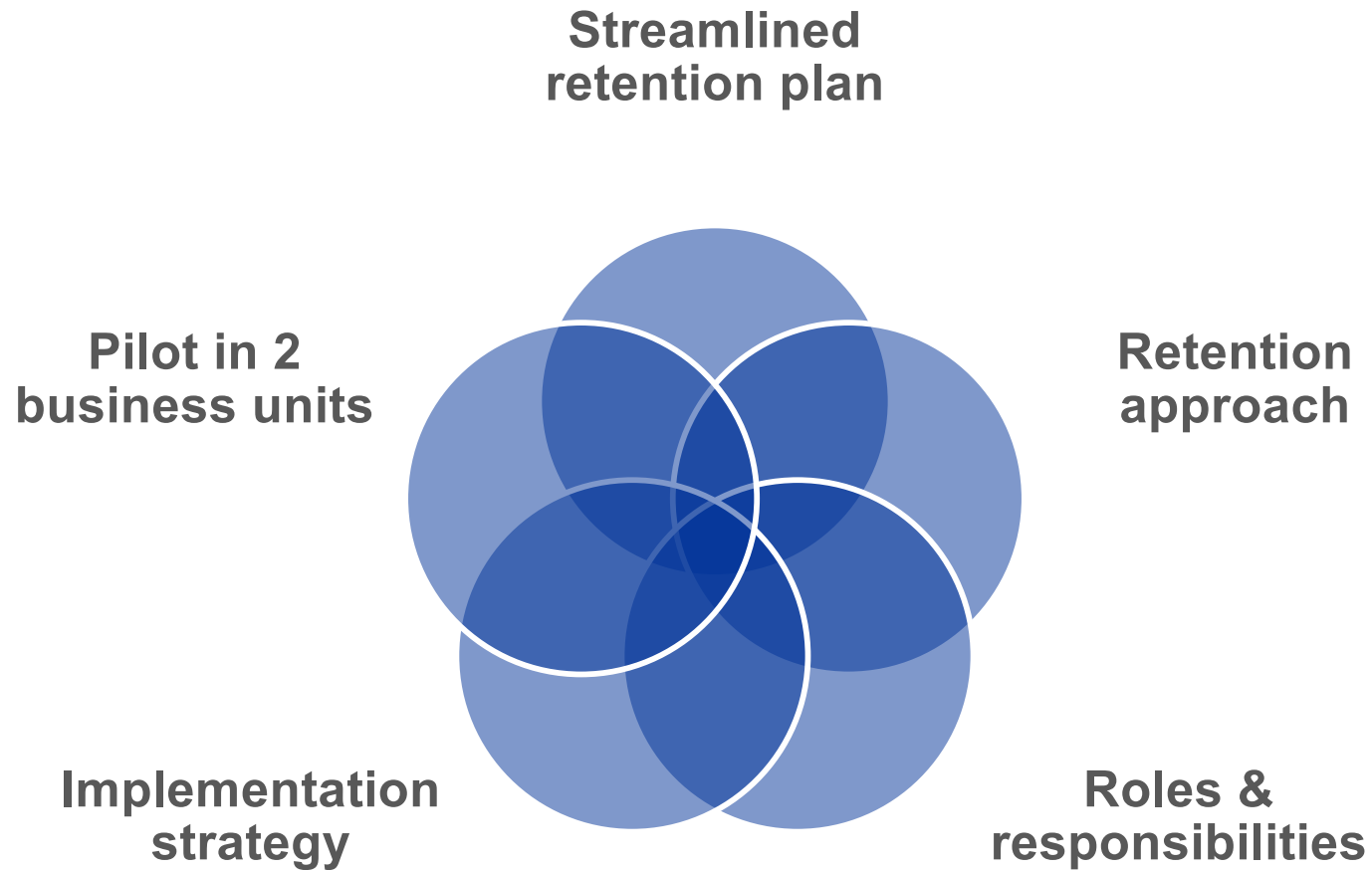


**Need to simplify the
ECB Filing and Retention Plan**



**Need to optimise the technical
solution**

2013-2014 - Preparation and planning



Old retention plan

Stages reflect paper moves

Code	Classes	Scope notes	Series	Records lifecycle		
				Active stage	Semi-active stage	Inactive stage
1.1	Definition of the ECB's institutional framework					
1.1.1	Policy framework	<p><i>Involves policy issues relevant to the ECB's institutional framework.</i></p> <p><i>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</i></p>	Master files (kept in SEC) - Signed original legal documents to be preserved on paper	5 years	T	P
			Local copies or convenience files (kept in BAs others than SEC)	5 years	T	D after relevant master file has been transferred
			Administrative files; notifications; transmission letters	3 years	D	
			Appointment of Board members	5 years	T + 15 years	D

One classification but 4 retention periods

Reviewed retention plan

Reduction of retention periods from 50 to 9

Class. Code	Series	Format	Retention Trigger Point	Retention Period
10	Financial stability and supervision <i>Covers the Eurosystem's statutory duties in the area of financial stability and supervision (Art. 105.5 of the Treaty)</i>			
10.1	General iss	4th level with only one retention period		Trigger: Event-based or Time-based
10.1.1	Legal advice on issues relevant to prudential supervision and the stability of the financial system <i>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</i>			
10.1.1.1	Legal advice and supporting documentation	Digital	E - Date case is closed	15 years (D)
10.1.1.2	Legal acts (signed original on paper) and supporting documentation (in digital format)	Physical/Digital		Permanent
10.1.1.3	Compliance cases and sanctions	Digital		Permanent
10.1.1.4	Litigations with legal precedents, judicial (Justice cases)	Digital		Permanent
10.1.1.5		Digital	T - End of calendar year	5 years (D)

Authoritative format:
Physical or Digital