Retention and preservation of digital records at the ECB

Experience and way forward

Association of French Archivists
Paris, 17 May 2018
Overview

- Background
- The ECB retention policy
- The implementation of retention on digital records
- First steps towards digital preservation
- Way forward and future challenges
A bit of background

1998 – Frankfurt am Main

European Central Bank

At the heart of the Eurosystem and the Single Supervisory Mechanism

A knowledge organization

Information is key to prepare decisions and perform our assigned tasks
The information management function at ECB
DARWIN: our Document Management System since 2007

- **23,000 users**
- **6,600** ECB users
- **16,400** Non-ECB users
- **13,800,000** Managed content (*documents, emails*)
- **3,800 collaboration tools**
  - *wikis, portals, blogs, discussion fora*
The ECB retention policy

To keep only what we need

– to serve current and future business needs
– for historical and research purposes
– to ensure compliance with legal/regulatory requirements
  • Data protection legislation
  • EU Council Regulation No. 354/83 as amended on the creation of historical archives and their opening to the public
A functional approach for the ECB retention policy

• First approval in 2008
  – Major reviews 2014 and 2017
  – Ongoing review during implementation in DARWIN

• Result of
  – business analysis of internal processes and main deliverables
  – benchmarking exercise with other peer institutions and central banks

• 4-level hierarchical structure, 13 top-level classes
  – administrative functions (classes 1-6)
    Establishment of ECB / Eurosystem / ESCB Corporate Governance, Budgeting and organisational planning, Management of human resources, Communication and information management, etc.
  – operational functions (classes 7-13)
    Euro area monetary policy matters, Market operations, Payment systems and market infrastructures, Financial stability and supervision, Statistics, Banknotes and coins, International and European cooperation

• 9 retention periods
  – 1 / 2 / 3 / 5 / 7 / 10 / 15 years - without archival appraisal
  – 20 years and permanent – with archival appraisal
### The ECB retention policy

#### Retention classes

<table>
<thead>
<tr>
<th>Class Code</th>
<th>Series</th>
<th>Format</th>
<th>Retention Trigger Point</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>Financial stability and supervision</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10.1</td>
<td>General issues</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10.1.1</td>
<td>Legal advice on issues relevant to prudential supervision and the stability of the financial system</td>
<td>Digital</td>
<td>E - Date case is closed</td>
<td>15 years (D)</td>
</tr>
<tr>
<td></td>
<td>Legal advice and supporting documentation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Legal acts (signed original on paper) and supporting documentation (in digital format)</td>
<td>Physical/Digital</td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td></td>
<td>Compliance cases and sanctions</td>
<td>Digital</td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td></td>
<td>Litigations with legal precedents, judicial proceedings (e.g., Court of Justice cases)</td>
<td>Digital</td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td></td>
<td>BA's contributions</td>
<td>Physical/Digital</td>
<td>T - End of calendar year</td>
<td>5 years (D)</td>
</tr>
</tbody>
</table>
What do we keep permanently

Records which contribute significantly to the knowledge and understanding of:

- The **foundation, organisation and functioning** of the ECB or of its predecessors
- The **corporate culture** of the ECB or related bodies
- The **environment** in which the ECB operates

and fully document:

- The activities and decisions of the **ECB’s decision-making bodies**
- The **core functions and projects** of the ECB and its main fora

are kept permanently as historical archives
Examples of permanent retention

- Documentation of **decision-making bodies and other main fora**
  - *Documents submitted to these fora are kept for maximum of 15 years at local level*

- Selected documentation related to **monetary policy, banknotes, banking supervision**

- Selected **contracts** (e.g. acquisition of **artworks** and of **properties** of significance)

- Other documentation of **historical relevance after archival appraisal**

- **ECB publications** (master files), **speeches** of Board members, documentation of major **arts & social events**
Implementation of the retention policy in DARWIN

Apply the ECB retention policy to documents stored in DARWIN so that they are automatically destroyed or preserved

Overview of the ECB retention journey

- 2010: Pilot
- 2012: Dedicated task force
- 2013 - 2014: Preparation and Planning
- 2015: Start of implementation
The retention approach in DARWIN

- The retention plan is integrated in DARWIN
- Retention periods are directly applied to folders
- The system automatically performs retention activities
- Reports for final disposition of records are created for approval
- Evidence of final disposition is kept permanently
- Use of “holds” to temporarily exclude records from scheduled destruction
Retention triggers in DARWIN

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

- **Event trigger** – Finalisation of folders (via ad hoc DARWIN functionality)
- **Folder based** retention
- **Manual** finalisation

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

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

**Calculation of retention periods from last editing**

**Calculation of retention periods from finalisation date of folders**
First lessons learned from retention implementation

Generous time allocation is needed

- Analysis of folder structures leading to retention decisions is time consuming and requires maximum accuracy
- Dedicated resources are essential

Iterative approach

- Retention plan may need adjustments
- Review of folder structures is often needed, leading to improvements

Adaptability & flexibility

- Unexpected technical issues may delay process or lead to review of approach
- Increased complexity of operational framework (e.g. banking supervision) requires new solutions
Digital Archiving and Preservation project (DAP)

- **2014/2016 Pre-Project & Initiation**
  - Business case, scope definition, market analysis, functional and technical requirements, etc.

- **2017 Preparation**
  - EU wide tender procedure and signing of contract (Preservica)

- **Q3 2018 Pilot**
  - 3 business areas

- **2019 Roll-out**
  - Pending successful pilot and product acceptance
What will be ingested into DAP system

• **All records with permanent retention** are eligible for ingest into DAP system

• **No later than 15 years after creation** records will be *transferred* from DARWIN, *checked/validated* and *ingested* into DAP system

• Some **less used proprietary formats** will be *normalized upon ingest*

• **Formats at risk** will be subjected to *active preservation*

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**Current work**

• Definition of technical modalities of ingest
• Mapping of metadata schemes & metadata elements between DARWIN and Preservica
• Preparation of information in DARWIN prior to ingest (e.g. deletion of temporary / back-up files, investigation on unknown formats, etc.)
Way forward & future challenges

Further streamlining of retention processes
- Reduce manual effort
- Simplify approval process
- Monitoring of retention practices

Ensuring quality of permanent documents
- Increased compliance with records management practices

Archival appraisal on digital documents
- Which approach against quantity and quality?
- Would analytics tools help?

Retention & preservation of structured content
- Part of Enterprise Information Management (EIM) strategy
Any questions?