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Directorate C - Transparency, Efficiency & Resources
SG.C.1 - Transparency, Document Management & Access to Documents

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Action Plan
of the European Archives Group Strategy
(2025-2030)

Action 1, NL-CH. Promoting the independence of archival institutions and their work towards transparency

1. To organise a common understanding of what EAG means/understands by this and to develop concrete actions that will indeed promote independence, the group first needs to gather the perspectives of each individual member on how they perceive such "independence of archival institutions" and "their work towards transparency". Members have different structures in which the archives operate and how transparency is seen as work/task of an archive or not. Sharing our views in a **workshop** or session at EAG meetings is the best way to organise this. A working group NL-CH will prepare this workshop and some predefined questions members can think of in preparation of the meeting.

2. Presenting the findings of this workshop will provide a common understanding of different and alike situations in which members operate and the promotion of independence and transparency has to take place. A next workshop will focus on sharing practices on "promotion" for situations that are alike (how this is part of mission, vision, archival (and other) law and regulations, how to be part of the conversation on transparency, how to act on

possibilities and threats regarding the independence and the work on transparency). How does this relate to the European level? Another **workshop** where members share in person will be most effective to engage on this goal. Some written down practices can also be useful, but a survey alone will not have the same results.

3. With the findings of the workshops a **discussion** should take place on how these best practices can be used to reach this goal on the European level. The group should also work out narratives that underline the independence of archival institutions and their work towards transparency that EAG and its members could use on a European and national level.

4. The group shall continuously look for opportunities to actively underline and promote the independence of archives and their work towards transparency as EAG on a European level and continue sharing members' **use cases and practices** to support other members in promoting on their national level.

Action 2, LV-BE. Making a successful contribution to the European vision of a data-driven economy

1. To find a balance between the protection of personal data and the interests of society (e.g. researchers) EAG will organise a workshop – discussion on the application of Personal Data Protection requirements in members' archives, to identify the most significant differences; for example, whether the Archives are responsible for ensuring that users comply with Personal Data Protection requirements.
As a result, the group will develop EAG **recommendations** for harmonizing these requirements based on best practices to help prevent different interpretations by Independent supervisory data protection authorities.

2. In relation to the Data Act and the Data Governance Act: The Regulation mentions that in exceptional circumstances, data from the private sector can be requested by public sector bodies, the Commission, the European Central Bank or another Union body. EAG will work on **recommendations** on how this information should be handled and how this data is to be preserved. EAG will list the preservation issues stemming from public sector data sharing and propose one or more possible solutions or mitigating actions per issue.

3. In relation to the Implementing regulation on high-value datasets (HVD): Establish a **common approach** and cooperate in making HVDs available according to the technical requirements.

Action 3, BE-ES-HAEU. Taking an active role in the ongoing changes and participating in developing civil society

1. Develop an **online portal (or the use of APE** - subject to group's decision) with information and documentation on socially relevant but at the same time delicate topics, which were often unmentionable and unaddressed for many years – often because of the inaccessibility of information:

- creating a limited think-tank (e.g. composed of the presenters of the cases at the Brussels EBNA meeting) to organise a very concise and punctual **survey** among the EAG members:
    - o to identify socially relevant topics, on which there is a need for accurate information and for a broader context, from a variety of perspectives, and for which there is widespread social interest;
    - o to identify the documentation available;

- organising a **workshop** to cluster the survey input into a number of overarching themes (e.g., cases about uprooted children (colonial or other contexts), refugees, displaced persons, victims of totalitarian regimes, victims of abuse of power by state-supported organisations, people convicted of collaboration or treason, war criminals, etc.);

- designating a 'lead' for each theme who will be responsible for outlining the general context of the theme and bringing together information on the specific cases, including the archival holdings relevant to documenting the case. If required, partnerships with specific stakeholders and interest groups should be established – to enhance de-bias and inclusiveness when developing the theme;

- consulting with APE (or possibly another portal) to bring the themes and cases online in a user-friendly, intuitive, accessible and inclusive way, obviously with particular focus on the authentic sources available.

In addition, particular attention should be paid to:

- o ensuring compliance with data protection laws and regulations and with the code of ethics for archivists;
- o considering what aspects could lead to participatory engagement of interested parties and to community projects and crowdsourcing initiatives and make these aspects an integral part of the project.

The following two proposals are related to the topic of human rights and will be coordinated in collaboration with ES:

2. Launch **projects** to preserve and disseminate through APE archival holdings from Europe that serve as evidence of human rights violations, especially during the 20th century under totalitarian regimes.

3. Draft **recommendations** to ensure the preservation of human rights archives as an active memory and remembrance policy.

Action 4, SE. Documenting key decisions taken and the key decision-makers involved in times of crisis

According to the Strategy on European archives (2025-2030) and its annex, and in relation to the *Directive on measures for a high common level of cybersecurity across the union,* the National Archives should, through EAG, establish a common approach to evaluating and managing information from essential and important entities as defined by the Directive (NIS2 2022/2555). The focus of this action should be on ***Securing critical information as a form of crisis preparedness.***

The main objective is ***Raising awareness among society as a whole and among decision makers in particular about the importance of securing critical information as a form of crisis preparedness****:*

Critical information can be described as information needed to preserve the vital functioning of the society in peacetime as well as during times of crisis and in its aftermath. This information is often preserved in archives but not necessarily. In a more unsecure situation in Europe with an ongoing war, information management during crisis is something that needs to be developed. It is therefore of importance to facilitate documentation during critical circumstances, both for public administration and for citizens. Enhanced preservation during crisis, being able to revisit and develop preparedness is one important area to investigate. During exceptional circumstances, information that normally would be disposed of since it is not considered public records or it would have been disposed of normally due to regulations, should be taken in consideration for preservation.

Issues on societal critical information will be discussed in a general meeting or **workshop.** One aim is to reach a common understanding about critical information but a workshop will also give the possibility to establish partnerships with specific stakeholders and interest groups. This will lay ground for the future work that can be a combination of workshops, webinars, and public awareness campaigns.

Action 5, HU. Contributing to an up-to-date and fit for purpose EU legislative framework that allows Member States to manage their digital records and archives

1. Continuously update the dynamic annex of the EAG Strategy

EAG Strategy contains a dynamic annex listing the EU legislation with an impact on the archives domain. Its continuous update will be part of this action collaboratively between HU and the Commission. Whenever a new Act is adopted and a link can be established with the

Archives domain, it should be brought to the attention of the group and the inclusion in the annex should be discussed. A short, fixed agenda point on this particular matter is to be included in EAG meetings when necessary.

2. Develop a framework of best practices in digital services

As part of the digital decade, the digital transition of public services that should be readily available online is one of the main goals and archives must continue their efforts towards achieving it. One of the sub-actions already mentioned in the strategy that the EAG should focus on is to propose a framework of best practices in digital services offered to users, which may be used as guidance at national level by members. HU is the action leader and will receive input from action 1 in order to ensure that the provisions of the Single Digital Gateway Act based on the existing services of the single European archival gateway—Archives Portal Europe—are applied, including the once-only principle for European archival services. Additionally, a session will be held on how to build and implement the framework beyond the archives, ensuring that the principle of provenance is fully considered across public administration.

3. Make an Impact assessment of the AI Act on Archives

The third proposed activity is to conduct a thorough examination of the implications of the AI Act on archives. The outcome of this investigation will be a risk assessment document, detailing the impact of these legislative frameworks on archives based on the archives' practices including the challenges the legislation does not cover, and including how to protect the data integrity, accuracy, avoid misinformation and ensure transparency and accountability of archival processes. This study will also assess the combined effects of the AI Act and GDPR on the management of digital records and archives. The goal is to understand how these regulations interact and influence archival practices, identifying potential challenges and opportunities.

This document will provide National Archives with crucial insights into compliance requirements and the potential risks associated with the integration of AI technologies in records management, acquisition, data management and access. By understanding these impacts, archives can better prepare and adapt their practices to align with EU regulations, ensuring the continued protection and accessibility of digital holdings.

During the preparation of the study, sessions will be held, focusing on risk management in the application of AI in archival services, as well as data autonomy. These discussions will address key challenges and best practices to ensure the ethical use of AI technologies and the secure handling of archival data in AI-driven environments.

The resulting document will be part of the planning of action 9 led by IE.

Action 6, LU. Defining the ways archives must influence records creation for better information and records management

1. Plan a common understanding and shared perspectives

Establish a common understanding: Develop a shared understanding of the EAG definitions of Archiving by Design.

Define influence: Clarify what influence means and how it materializes in the creation of records, emphasizing its interactions with the "by design" concept.

Link to long-term preservation: Determine how this strategy aligns with long-term preservation objectives, which are fundamental to our missions and often defined by national laws.

Assessing needs and practices: Evaluate existing initiatives, standards, or legislation related to records by design, and their impact on long-term data and records design.

2. Set up a methodological framework

Strategic alignment: Influencing the creation of records requires implementing a methodology that aligns with the EAG strategic framework and is applicable by the Members.

Achieve long-term objectives: This methodology [in the sense of methodological framework] should enable the achievement of long-term preservation and access goals, as defined in our heritage and professional practices.

Improve information management: Collaboratively address aspects related to enhancing information management, including heritage, administrative, and access to records.

3. New role of interoperability

Lifecycle perspective: Interoperability, as a European framework, should be considered as an essential element of data and records design. This includes a lifecycle perspective related to data and records design, allowing to manage access perspectives, encompassing and long-term preservation objectives.

Members will be able to discuss the organizational aspect implying that interoperability with "by design" implies dependencies which require collaboration and cooperation with other sectors of activity, change implying new skills.

We will run a few (maximum 3) half-day **workshops** and share summaries based on members contributions according to EAG requirements.

4. **Joint controllership of data following the introduction of the Commission implementing regulation (EU) 2023/1070**

During the Brussels meeting NL raised this issue and proposed measures to help align joint responsibilities with existing national laws and improve data management: ensure that the data management and archival policy enforces that the data concerned is findable, available, readable, interpretable, reliable, and future proof; allow the enforcement of these archival values concerning the accessibility of data.

LU and NL will follow up on whether members of EAG could share any possible concerns on this and their opinions on the suggestions as well as issuing a list of **recommended actions** following the consultation.

Action 7, DK. Contributing to the common specifications as well as certification and accreditation processes for electronic archiving

A more in-depth discussion is necessary about how National Archives should handle the challenges following the eIDAS-act as this affects the archives in terms of standards for digital archiving, in relation to accreditation as a digital archive/trusted provider.

The following set of sub-actions will help achieving this goal:

1. Identify the various possibilities for accreditation of digital archives/trusted repositories and suggest how the archives should position themselves to the question of accreditation. A **standing point** will involve all members and tackle the various aspects of this issue.

2. Facilitate the bilateral knowledge sharing regarding the current state of the art regarding digital archiving and standardising.

3. Follow-up on the standardisation work of the European Technical Committee for Standardisation CEN/TC 468 (Management of digital preservation). National Archives which are members of the working group will continue to regularly **update** the EAG about any developments, same as they did in the Brussels meeting. DK will coordinate this in collaboration with FR.

4. A **presentation** by the Commission service in charge with drafting the implementing acts of the eIDAS regulation, focusing on the aspects above which present an interest for the archives domain.

The first set of sub-actions will be prepared for one of the following meetings, to ensure a good timing with the adoption of the Implementing rules of the eIDAS regulation, foreseen for May 2025 at the latest.

Action 8, IE. Supporting EU open data initiatives by making historical and archival data as readily accessible as possible to the public

1. **Present** different models from EU countries of large-scale projects presenting historical and archival data using automated transcription software. These presentations will come from institutions working with high-value, high-volume data sets such as historical census data, historical academic records, archival documents etc. A baseline will be established in relation to current access provision for historical data in member states.

2. **Technical presentation** of how machine learning/AI technological solutions including Optimal Character Recognition (OCR) and different language models can be used for automated data processing for historical and archival data.
Presentations will examine different software solutions such as open-source transcription software, propriety software etc.
The public access to such data via application programming interface technology (API) and on-line platforms will be explored enabling enhanced access and functionality.
3. Discuss by way of **round-table** at an EAG meeting on the use of machine learning in different national archives exploring uses, potential opportunities, considerations for future application.
4. Draft **guidelines** by sub-group on the application of such technologies for presentation to the EAG for consideration at EU and National Level recognising legal issues and access regulations such a GDPR and Council of Europe R(2000)13 that may relate to access.

Action 9, PL-HAEU. Defining a records and archives management competence framework

1. The first step will be to conduct a **desk research** of reports and other papers on competences related to records and archives management and associated fields, especially to digital technologies. The primary focus should be on defining a competence framework for archivists working in national archives.
Seven key aspects that play a vital role in defining the responsibilities and practices of this group of archivists have been identified and will be discussed. Organization of a **workshop** will help identify the common competencies of archivists working in the national archives.

2. Discussing the above aspects in detail during the workshop will provide a comprehensive framework that can serve as the foundation for preparing a well-structured **survey**. By thoroughly examining each key area we can identify the critical competencies and skills necessary for archivists working in the national archives. This in-depth discussion will ensure that the survey is designed to accurately assess these competencies, highlight areas of strength, and pinpoint opportunities for professional development. To ensure the quality of the survey, it will be discussed with EAG members, and after that sent to broader audiences, both to public and private European organizations.

3. After gathering the survey responses, we will proceed to the preparation of the **competence framework** for archivists working in the national archives. Firstly, we will analyse the data from the survey and decide on the methodology for developing the framework, including grouping and describing the competences and skills related to them, levels of advancement, etc. After a draft version of competence framework will be completed, it will be disseminated and discussed among EAG members, and after that a final version will be prepared.

Action 10, DE. Helping to protect democracy through access by citizens and media outlets to reliable and authentic documentation

1. Organise an **information point** on the state of play of the setting up and preparatory steps for implementing the compliance aspects of archiving e-services with the Regulation (EU) 2028/1724, establishing a single digital gateway to act as the single entry point through which citizens and businesses are able to access information about the rules and requirements that they have to comply with for cross-border users in matters such as birth, residence, studies, work, move, retirement and start/run/close a business.

2. Organise a **survey** to learn more about which of the matters mentioned above are relevant for archive services and define use cases.

3. Cooperate with the archives of the European Commission to address the question of how to permanently preserve the personal data that will be made available on Your Europe portal.

4. Members agree that the archives should be used as sources of reliable and authentic documentation that **counters disinformation**, both by citizens and media outlets and visibility efforts should be made on our side. At the same time, there are some caveats such as biases in choosing the topics to be promoted and problems with the reliability and authenticity of some documents. Here there are some common aspects with action 3 (BE-ES-HAEU).