

RECORDS MANAGEMENT GOVERNANCE

IN 12 EASY STEPS

A GUIDE CREATED BY  aiim



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Not too long ago, records management was a primary concern for many organizations. A small event in a large organization was the trigger that catapulted records management to a topic that was being discussed in board rooms everywhere and resulted in numerous regulations being drafted and adopted.

Once the visibility of the initial situation calmed down, records management was quickly returned to its normal place of perceived importance and organizations quit talking about it. While we have not seen any organizations or company executives being fined or sent to prison for their organization's records management transgressions, that is not cause to let our guard down.

This guide was developed to help you and your organization in your records management endeavors. We have strived to identify the key areas that should be reviewed to help you avoid unfortunate and costly non-compliance issues with your records.





GETTING GOVERNANCE RIGHT

Records Management Governance is key to any good records management program. There are three elements to Records Management Governance:

- Records Management Policy
- Records Management Plan
- Records Management Program

The foundation of any records management strategy and/or program is the Records Management Policy which:

- Distinguishes records management as a key part of the organization strategy
- Sets expectations for the way employees participate in the normal course of business
- Identifies and establishes the responsible authority for records, content and information in the organization

The Records Management Plan:

- Defines the rules for creating and capturing records and metadata
- Provides guidance for how records are received from other organizational or outside entities
- Provides guidelines for transferring records to other organization units or outside entities
- Defines the maintenance of records and associated metadata, disposition (destruction or archival) activities and appropriate documentation of those activities, and third-party (contractor, subcontractor) requirements
- Identifies all relevant national standards and legal, regulatory, or contractual documents that must be followed for compliance
- Provides for management structures, record inventorying, retention schedules, a corporate filing plan, vital records protection including backup/disaster recovery, records center operations and Information Technology (IT) department obligations, preservation, and records management training, monitoring, and auditing



The Records Management Program includes guidance on record status of working papers or files and drafts, personal papers, use and removal of documentary and record materials, mapping of business activities to various records' lifecycle and provides guidance and instructions for documenting policies and decisions, especially those decisions reached orally and for those communicated electronically.

- Have you established a Records Management Policy?
- Does it identify Records Management as a key organization strategy?
- Does it set expectations? Does it identify the authority responsible for records management?
- Did you develop a Records Management Plan?
- Does it provide rules for creating and capturing records?
- Does it provide guidance on the maintenance of records and their associated metadata?
- Does it provide guidance for management structures, record inventorying, and scheduling?
- Have you established a Records Management Program?
- Does it provide guidance concerning personal papers and working drafts?
- Does it help map business activities to records lifecycle?





STEP 01

KNOW WHAT YOU HAVE

The records inventory identifies and quantifies ALL organizational records—paper and electronic. Once the records are identified, they are then analyzed for various purposes:

- Records retention
- Legal protection
- Improvement opportunities

In electronic environments, the inventory is also important because each records series must be addressed by specific rules that must be programmed into your Records Management Application (RMA).

Tracking the records will be made easier if you use or modify industry-standard templates or use a Records Management tool that may be a part of your RMA.

Key Questions:

- Have you conducted a records inventory to identify all organizational records in both paper and electronic format?
- Does it identify all the records (paper and electronic)?

STEP 02

KNOW WHAT TO DO WITH WHAT YOU HAVE

Once you have identified and analyzed your records, you can take that information to develop a timetable that will determine how long your records must be kept and when they can be disposed. The timetable should include references to statutes and other legal issues associated records series as they relate to your specific industry. It is also a good idea to take into consideration good business practice and document the treatment of records not only based on statutes and regulations but also good business practice. The Records Retention Schedule should enable an evaluation of records for various purposes:

- Administrative including control and review (i.e., external audit), fiscal, and tax purposes
- Legal which may be compliance-based and include statutes of limitation considerations
- Informational, i.e., research value, are typically determined by business units themselves

Key Questions:

- Have you developed your Records Retention Schedules?
- Did you include a timetable for how long records must be kept?
- Did you consult statutes and regulations at the Federal, State, and local level?



STEP 03

ESTABLISH A FILE PLAN

The file plan documents the indexing and classification schemes for arranging, storing, and retrieving records. It is usually organized by records series or category. Each records series includes a description, record keeping requirements, roles, disposition, and associated non-record collections.

Key Questions:

- Have you established a File Plan detailing your indexing and classification schemes?
- Did you include descriptions of the records and any record keeping requirements that you want to have followed?

STEP 04

ENSURE REGULATORY AND LEGAL COMPLIANCE

To ensure regulatory and legal compliance at the federal, state/province, and local municipality levels, your records management program should identify relevant laws, best practices, and tests as well as testing metrics to ensure the integrity of your records.

Key Questions:

- Have you identified the standards, laws, best practices, and test/metrics that you need to follow?
- Did you investigate the laws and regulations at the Federal, State, and local levels?
- Did you establish quality metrics for your records?



STEP 05

ENSURE BUSINESS CONTINUITY

We never know when a disaster, large or small, may happen so it is important to do your planning before you find yourself in a disaster situation. Continuity planning, continuous data protection, and disaster recovery are part of a risk management strategy. Business continuity planning directly determines how an organization protects and backs up its records, metadata, and other information, including frequency and establishment of hot, warm, and/or cold sites.

Backup and Disaster Recovery plans are somewhat subjective. Rarely will an organization fail a records management audit because of how these plans are produced. However, not having a plan for records recovery may put passing a third-party audit at risk.

The Backup and Disaster Recovery plans should be reviewed on a regular basis and modifications made to keep the plan current to the organization's needs and information architecture.

The key to continuity is ensuring the records necessary to run the business are available. A Vital Records Program identifies and protects those records that are necessary for the continuation of operations under emergency conditions. The policy and procedure for these special records must be documented for on and off-site storage as well as backup and disaster recovery for electronic records.

Key Questions:

- Have you established a Vital Records program?
- Did you identify the records considered to be vital to the continuity of your business?
- Have you developed/reviewed your Backup/Disaster Recovery Plan?
- Did you test your Backup/Disaster Recovery Plan to make sure it works and that nothing has been neglected?



STEP 06

PROTECT YOUR INFORMATION

Policies, procedures, and processes must be developed to ensure protection of all confidential information (requirements will vary depending on record type) when stored, accessed, and transferred. Companies must investigate their record systems and communications to ensure proper:

- Treatment of security designations
- Internal and external access privileges
- Labeling of documents and communications
- Tracking of record creation, access, modifications, deletion, and transfers
- Identification of records under hold orders

Organizations must have a written and communicated policy concerning email, instant messages, and social network communications. If used, all formats must be addressed in the Records Management Plan. One common way to fail an audit is by not having policies that do not preclude corporate email from being forwarded to personal email accounts. Co-mingling of corporate and personal information is wrong and can have significant implications should your organization get into a legal situation.

Key Questions:

- Have you developed/reviewed your Security and Privacy Plan?
- Did you include email and social network communications in your plan?

STEP 07

MAKE IT EASY TO FIND STUFF

Metadata management involves information pertaining to records but ancillary to the records themselves.

Metadata can:

- Serve as retrieval aids
- Help you track records
- Assist with monitoring usage, actions, and location (in the case of physical records)

Metadata can also provide metrics on business process performance. In the case of Enterprise Content Management (ECM) or other electronic systems that store records, metadata can also be used instead of legacy applications to store information. In those cases, the ECM system then becomes a line-of-business of application that processes and handles more than just the records themselves.

Key Questions:

- Have you developed/reviewed your taxonomy and metadata schema?
- Does your schema take into consideration commonly used terms?



STEP 08

MANAGE IT ALL

Records Center considerations include managing volume, granularity of accessibility, security provisions at each location, employee screening, transport methods, request and transfer procedures, temperature and humidity control, fire suppression, risks posed by toxic or hazardous materials, and records movement tracking. IT departments generally understand requirements for hot, cold, and warm sites, and protection of electronic information.

Key Questions:

- Have you developed/reviewed your Records Center Operations Procedures?
- Do your procedures establish security provisions for the workers and transporting your records?
- Did you identify the temperature and humidity controls needed to preserve your records?

STEP 09

MAKE SURE YOUR RECORDS STAY AROUND

Paper can disintegrate, ink can fade, bits and file formats can be lost, and microfilm can undergo chemical decomposition. For most analog storage (paper, film) preservation is a function of storage conditions and handling. For digital storage, media life and file format must be carefully considered.

We can easily understand what to do to preserve physical records. The increased volume of digital documents is presenting a new issue for organizations. It is important to carefully investigate the file formats to make sure the one you choose to preserve your digital documents is sustainable, developed by authoritative independent organizations, and not reliant on technology. There is no one perfect file format and new ones are being developed all the time. Therefore, it is important to make sure the format you choose will allow you to migrate to a new format if you choose to do so.

Key Questions:

- Have you developed/reviewed an information preservation plan for physical and digital information?
- Do you identify a file format use when preserving your electronic records?
- Do you define a migration plan in the event you need to migrate your records to a new format or storage medium?



STEP 10

GET RID OF RECORDS BEFORE IT IS TOO LATE

The process of disposition involves the destruction or archival of records that no longer must be maintained because their retention period has lapsed, either immediately (best for risk management) or at regularly scheduled intervals.

A disposition policy must address records retained past the retention period due to their business value, and include documentation procedures for recording the rationale behind additional retention.

If archived (whether internally or outsourced), organizations must establish that all operational and administrative needs have been satisfied prior to transfer, and appropriately document records to be transferred. Whether destroying or archiving records, organizations must determine the extent to which it is necessary to retain record metadata.

The disposition procedure for a record series involves documenting the steps involved and maintaining the documentation as records. You should include in your documentation the following information:

- Assign authority
- Verify retention requirements
- Suspend destruction
- Document destruction details
- Update the RM system
- Destroy copies
- Meet confidentiality, security, and privacy requirements

Key Questions:

- Have you reviewed your disposition/destruction/archival procedures and audited the implementation of the procedures?
- Did you assign authority for your records program?
- Have you verified your retention requirements?



STEP 11

TRAIN THE TEAM

Establish a training program that covers ALL aspects of the RM program (including management, employees, contractors, etc.) regarding the role that information and records play in serving the organization.

Document and provide the training regularly. Documentation includes training materials, information about the trainer, attendees, and date and time of attendance.

Combine on-the-job training and formal education. Benefits include reduction in costs and risks due to more efficiencies, standards compliance, and error reduction.

Key Questions:

- Have you established a training program?
- Does the training cover all aspects of records management at all levels of management in your organization?
- Do you regularly offer the training?
- Is your records management training provided to employees entering your organization?
- Do you provide regular refresher training for all employees?
- Do you require ALL employees to renew their training?

STEP 12

MONITOR, AUDIT, AND OPTIMIZE

Organizations must preserve records concerning annual internal monitoring and external auditing activities of the records management program. Whether required by regulatory agencies or as part of a corporate risk management initiative, external auditors will want to review internal monitoring efforts to establish sufficiency, validate completeness, and, possibly, recommend opportunities for improvements and potential efficiencies. Internal monitoring activities should dovetail with corporate training. External auditors will want to review previous audit documentation, findings (including deficiencies noted), and corporate efforts to correct deficiencies.

Key Questions:

- Have you scheduled and implemented periodic audits to identify your risks?
- Do you look for areas in your program that you can improve?
- Do you look not only at the way records are handled but at the processes to determine how they can be improved?



CONCLUSION

Records are an asset that organizations must manage. Records management establishes the practices and guidelines that must be followed to ensure that any record created or used in an organization in the course of normal business activities is maintained properly. As a result of the introduction of the regulations, organizations are more aware of their records and are regarding them as business assets rather than taking them for granted. Now, what we need to do is manage the records more effectively.

Don't rush your records inventory. It will help you to plan your storage requirements for onsite and archival needs.

Make sure that you involve your legal department along with your records managers, IT department, and line-of-business subject experts to ensure all factors are thoroughly explored as you analyze your records and develop your Records Retention Schedules. When the analysis is completed, it should be reviewed by your organization's leadership and approved at a high level in the organization.

While it is best to use standards, best practices, and test/metrics that have been vetted through a rigorous process, you should also identify and document those standards, best practices, and test/metrics that you have developed within your organization that are specific to your needs. One of the standards that you should consider using is ISO 15489-1, Information and documentation – Records management – Part 1: General, which provides guidance on drafting a Records Management Policy.

ABOUT AIIM

Here at AIIM, we believe that information is your most important asset and we want to teach you the skills to manage it. We've felt this way since 1943, back when this community was founded.

Sure, the technology has come a long way since then and the variety of information we're managing has changed a lot, but one tenet has remained constant. We've always focused on the intersection of people, processes, and information. We help organizations put information to work.

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