

Records Management *Perspectives:* Rules of engagement

How to get everyone on board with
your RIM program

Issue 2, 2014

The power of memory

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RECORDS MANAGEMENT PROGRAMS RELY ON PRACTICAL POLICIES



Clear and workable policies and procedures are the foundation of a successful records management program. In this paper, Bill Proudfit explains what you need to consider when developing policies for your organization.

Policies must be people-friendly

Developing an effective program is a balancing act between the needs of people and the needs of the organization. It's tempting to design the perfect, all-encompassing solution, only to find that people can't – or won't – use it. That's as true of policies and procedures as it is of an IT system.

A useful preliminary is to set out some rules for the policymakers. To be a success your records management policies or program must meet these criteria:

- Be useful and meaningful to people
- Be consistently implemented by people

- Be feasibly monitored by the organization
- Be achievable for people, groups, departments, functions or sections of the organization, using the resources, technology and time available
- Be approved by the right people at the right level in your organization

Records management activity is pervasive. Everyone who creates, receives, uses or disposes of records is involved. Consequently, any attempt to create a records management policy or program requires a thoughtful, careful and collaborative approach. Bringing all of the principal functions, departments and groups together, with a cross-section of people, can be challenging, but it's essential. Involving only one group of staff, whether senior, middle or line-worker, will likely result in an unworkable policy for the other two-thirds of the organization.

Start by talking it over

It takes an experienced records manager to describe the compass of a records management program. It will be necessary to discuss a wide range of subjects with others in the organization:

- Settling on a definition of a record for your organization
- Ownership, custodianship, copyright and accountability
- Security of records, privacy, confidentiality and sensitivity
- Compliance with external standards and legislation
- Compliance with internal standards and policy
- Sharing within the organization – including access, openness, “closeness” and reusability
- Quality of records – their accuracy, timeliness and value to the organization
- Creating valid and appropriate records – ensuring consistency, description, metadata and search



Records management is not often understood by staff. You'll need to have answers to all their questions:

- What do you mean by a record?
- What is a record?
- Does it include email?
- What about customer data?
- Or accounting information?
- Does it include Oracle, SAP and CRM?
- Are drafts included?
- How about copies?
- Does it include web pages?
- And the intranet?
- Does it include magazines and newspapers?
- Are we talking paper and electronic?
- What about my personal files?
- Or records I use at home?
- Does it include packages?
- Are drawings records too?
- Or advertisements?
- Does it include uniforms?
- Is this required or optional?
- Who is going to do this for me?
- Must I dispose of the record?
- Who decided the retention period?
- Who approved this?
- Why do I have to do this?
- Who owns the records?

RECORDS MANAGEMENT POLICY – THE CORE OF YOUR PROGRAM

There will be many policies, processes and procedures making up a complete records management program, but records management itself is the core policy. It's worth remembering, when creating policies, to use practical examples and avoid unnecessarily formal language or legalese.

Your records management policy must address all of the following areas:

- A definition of records
- Responsibility
- Validation
- Description and search
- Life cycle
- Retention
- Legal proceedings and record holds

Agree a definition for records

Records are one part of information. If all information is defined as a record it is likely to be so broad a definition that it is not useful. To approach a good definition, be clear about the characteristics of a record. Define what is and what is not included for a record in the organization.

The following examples from the International Standards Organizations (ISO), Association for Records Managers and Administrators (ARMA), are accompanied by a narrow definition and a broad definition.

Your organization must agree the definition for your records management program to progress and succeed.

ISO 15489 Information and documentation -- Records management -- Part 1: General

“Records – information created, received and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business.”

ARMA Association for Records Managers and Administrators (United States)

“Records are the evidence of what the organization does. They capture its business activities and transactions, such as contract negotiations, business correspondence, personnel files and financial statements, just to name a few.”

Records come in many formats:

- Physical paper in our files, such as memos, contracts, marketing materials and reports
- Electronic messages, such as email content and their attachments and instant messages
- Content on the website, as well as the documents that reside on PDAs, flash drives, desktops, servers and document management systems
- Information captured in the organization's various databases

When there's a lawsuit, all of these – including the copies that individuals have retained and any items prematurely deleted or destroyed – may be identified as discoverable. This means they could be used against the organization in a lawsuit.

A narrow definition

Records are both physical and digital. Records describe the activities of the organization. Purely personal information, documents and files with no connection to the organization are not considered records. Physical records may be two-dimensional objects, such as documents, photographs, posters, layouts, diagrams and plans. Physical records may be three-dimensional objects such as packages, film, CDs/DVDs, audio/visual tapes, finished products, display items and uniforms. Digital records may be office suite files, emails, intranet content and still and moving images. (1) Digital records include the data in enterprise resource planning (ERP) systems used for sales, customer relationship, accounting and management reporting only after monthly, quarterly and annual reports have been produced and the data is cleansed of all private and personal details and moved to dedicated data records repositories.

(1) Making it clear ERP data files are, or are not considered digital records, impacts significantly upon the scope and the complexity of the records management program. This could also say: Digital records do not include data in enterprise resource planning systems used for sales, customer relationship, accounting and management reporting. They are covered by information technology policy.

A broad definition

A record is information in any form or medium that is within the organization's control and relates to the organization's activity or business. That includes digital and physical information and other tangible items such as promotional materials. Recorded information that is personal and not related to the organization's business is not a record under this policy.



Decide who is responsible

The owner of a record is the organization. But everyone who uses a record bears responsibility. Employees, contractors, interns and consultants are custodians of the organization's records. They are required to follow the records management policy and its program components. There are organizational records managers and departmental records coordinators to help with security standards, reviews, compliance and audit processes.

Therefore:

The person who creates the record is responsible for managing it according to the records management program.

The person who receives a record from outside the organization is responsible for managing it according to the records management program.

Validation – evaluating the evidence

The validity of records is determined by these four criteria:

1. An **authentic record** is what it says it is. The record was created, sent or received by the person named on the record and the date and time are authentic.
2. People with direct knowledge of the facts create a **reliable record** close to the time of the transaction.
3. A **record with integrity** is complete and has not been altered.
4. A **usable record** can be found, retrieved and interpreted. The context of the record to a single transaction or sequence of transactions is clear.

Description and search

Records must be described with enough detail that they can be found. Physical records must be labelled with workgroup custodian, subject, date opened and closed. Those label descriptions must be kept in record-keeping systems.

Digital records must contain adequate metadata to enable search. Searching without adequate metadata frequently returns too many records to be useful. For example, subject, creator, date created, last modified date and retention category are the minimum metadata requirements for digital records. Records managers and records coordinators will work with Information Technology and all employees on how to ensure records can be easily found when searched.

Understanding the life cycle

Records exist in a life cycle and the stages in the cycle impact how they are managed.

Active records

Active from the point of creation and useful for a period of time. Active records must be very easily found, retrieved and used. Retention starts from the point of creation.

Inactive records

Inactive for a period of time but still potentially useful to the organization. Inactive records need not be kept close at-hand. Physical inactive records are best kept off-site. Digital inactive records are best kept in repositories using high compression with retrievable times in minutes or hours rather than seconds.

Disposal or archive

Disposal or transfer to a historical archive is the end of the records management life cycle. The disposal or transfer event is defined on a records retention schedule. Historical archives are managed by professional archivists and are normally not considered part of the records management program.

Retention for different types of records

A retention schedule defines how long to keep a record, in what format and may define when to transfer the record to another location or media.

Official, primary, final-copy, declared or substantive records are those that must be kept for the period of time defined on the retention schedule.

Unofficial, temporary, copy, draft or transient records are those that must be created, used and disposed of at any point before the defined retention period has been met. Those records must not be kept indefinitely, or any longer than the defined retention period.

Back-up processes are used to restore services in the event of technical failure or disaster recovery requirements. Digital records' retention requirements cannot be met with back-up processes.

Legal proceedings and records holds

The organization may be involved in legal proceedings from time-to-time, which will likely require records. It may be necessary to stop the normal disposal processes and place some records on hold. The legal department will work with records managers, records coordinators and management to identify records on hold, protect them, and collect them when necessary. The legal department will release records from hold. Records managers and records coordinators will assist employees on how to meet records hold requirements.



Related policies, procedures and processes

A records management program is made up of many policies, procedures and processes, beyond the policies associated to records management itself.

The following table lists the most common under these headings:

- Information technology
- Description
- Ownership
- Compliance
- Sharing
- Publishing

Some policies, processes and procedures relate to more than one heading. A complex organization, operating in more than one country, will have most of these and perhaps more. A simpler organization may have only a few. These should be regularly reviewed and where necessary revised, to meet changing circumstances, technology and organizational structure. Employees must know they exist and how to apply them to their records on a day-to-day basis. They are the focus for employee engagement and on-going training, to ensure an effective records management program.

Records management program: Policies, processes and procedures					
Information Technology	Description	Ownership	Compliance	Sharing	Publishing
<ul style="list-style-type: none"> • Digital public services • Digital signatures • Email and messaging • Internet • Intranet • Mobile computing • Technology procurement • Use of authorized software • VPN 	<ul style="list-style-type: none"> • Descriptive classification • Document control and versioning • Metadata • Retention classification • Taxonomy 	<ul style="list-style-type: none"> • Departure of employees • Intellectual property and copyright • Records custodianship • Transfer of employees 	<ul style="list-style-type: none"> • Digital signatures • Email and messaging • Legal requirements for records retention • Litigation and discovery • Records disposal • Records reviews and audits • Records storage • Retention schedules and processes • Security and personal data 	<ul style="list-style-type: none"> • Closed access • Library services • Open access • Public access rights to records • Security and personal data 	<ul style="list-style-type: none"> • Intellectual property and copyright • To internet • To intranet • To other media

Places for further information

Crown Records Management provides expert advice on how to create, manage and provide services for records management programs.

Local and international records management, information and archival societies and associations are also useful sources for expertise and advice.

These include:

- AIIM – Association of Information & Image Management
- ARA – Archives & Records Association
- ARMA – Association for Records Managers and Administrators
- ICA – International Council of Archives
- IRMS – Information & Records Management Society
- IRMT – International Records Management Trust
- NARA – National Archives & Records Administration
- RIMPA – Records and Information Management Professionals Australasia
- RMSJ – Records Management Society of Japan
- SAA – Society of American Archivists

