records management

BEST PRACTICES

EMBASSY
RECORDS MANAGEMENT AND STORAGE
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A practical and applicable approach to building a functional and compliant records management program.

Creating Value, Time, and Space

In today's day and age, every business collects and maintains sensitive information. Properly managing documents — electronic and otherwise — is imperative for all organizations. The ability to assess and analyze document management needs has been identified as a critical success factor for the constantly evolving world of business. But establishing effective records management extends beyond adopting a new course of action. Instead, the specific procedures for a given organization should be explicitly understood and consistently executed in a comprehensive outline.

Embassy Records Management and Storage offers insight into the integral aspects and experiences of record management. Our goal is to help your company get the most for its dollar, save your employees time that they would spend looking for records, and create space in the office by creating a more intuitive records storage system.

OUR MISSION

To provide our customers with the highest quality of service while managing their sensitive information in the most efficient and effective manner.

Why Does It Matter?

WHAT ARE BEST PRACTICES?

This ebook was created to be a resource for customers who are interested in improving the efficiency of their records management program, becoming compliant, and learning more about best practices.

Best practices are established as a gold standard that all businesses, no matter the size or industry can follow. These practices should optimally be a part of a larger comprehensive records management plan.

The companies that regularly and consistently practice the standards set forth in this ebook are the companies that stand out as the best and most valuable.

We are here to help you get your company where you want it to be. Throughout this ebook, our experts will present guiding principles to establish in your office. Take some or take all, these are the best practices or records management.

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I. Retention

A COMPLETE AND COMPLIANT RECORDS RETENTION POLICY LAYS THE GROUNDWORK FOR AN EXCEPTIONAL RECORDS MANAGEMENT PROGRAM.

This starting place is the best area to focus on in order to create a foundation of compliance and organization.

A Records Retention Schedule is a document that makes sure that records are kept only as long as needed for legal an operational reasons, and that the documents are properly disposed on when no longer needed. This document supports the organization and its efforts to manage records, control costs of storage, locate and retrieve documents, and

dispose of records at the appropriate time. Finally, this document enables a company to be legally comliant of retention periods. The Records Retention Schedule represents all records, no matter their format or media type.

The development of this document can be broken into four sections:
- Identify records groupings
- Create one classification scheme
- Discover legal requirements
- Overlay operational requirements

Identify Record Groupings

A records inventory is a complete and accurate listing of the locations and contents of all records. This inventory should cover all departments and systems. This inventory will be the basis for the retention schedule.

Your inventory should group records into categories or classes. When grouping records, it is critical to use the same nomenclature to ensure consistency.

Create One Classification Scheme

A classification scheme for records is a grouping or records by function, class, and type as a way to deal with high volumes of records. One way to think about this is to assign your records to a department, their role within that department, and more specifically what the file contains.

An example of this would be:
Record Function: Intern Program
Record Class: Business Intern Program
Record Types: Intern Applications, Intern Interview Records, Intern Human Resource Records

Discover Legal Requirements

An essential part of creating the Records Retention Schedule is conducting the research to determine what the legal retention period for each record class is.

At a minimum, these types of legal requirements must be considered and evaluated:

- Local
- State
- Federal
- International (if applicable)

Overlay Operational Requirements

One important part of retention is the legal requirements, but the length of time that a record must be kept in order to meet departmental needs must also be considered.

When comparing this operational retention period to the legal retention period, the final length should be the longer of the two requirements.
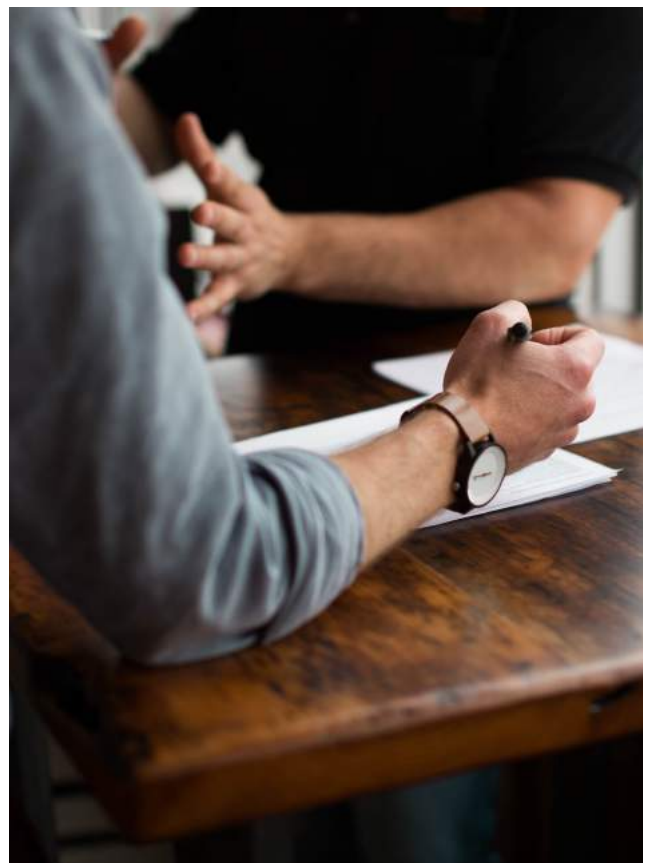
BEST PRACTICES: RETENTION

- Select one universal Records Retention Schedule to apply across all departments and units that will capture all records in all formats and forms.

- Support the Records Retention Schedule with legal research at all legal levels to discover retention requirements applicable to your business.

- Review the Records Retention Schedule every 2-3 years and look for any updates that need to be added or any information that is no longer applicable to your organization.

- Define for each record class the event that will signal the beginning of the retention period. This could be a closing, a contract signature, or an acquisition.

- Reduce the number of records that have no ongoing value to the company or organization. A great way to do this is to conduct yearly reviews of onsite records company-wide. Inactive records that are still within their retention period can be sent to off-site storage.

- Identify records that are critical to business, financial, and legal operations. These documents should be kept onsite if necessary and marked "Do Not Destroy".

- Establish a rollout plan for the Records Retention Schedule. This should include initial and ongoing training programs for all employees that will be handling the retention of their department's records.

II. Policies & Procedures

A GOOD RECORDS MANAGEMENT PROGRAM IS SUPPORTED BY POLICIES AND PROCEDURES THAT ADDRESS EACH STEP OF THE PROGRAM.

Policies set standards and serve as evidence of the support and investment by management in a compliant records management program. Companies can have separate policies and procedures for different record types or departments can address all records in their policies and procedures.

Guidelines must be consistently and universally applied in order to have a functional records management program. Roles are clearly defined, and policies and procedures are accessible and clear to each employee. When employed properly, these policies and procedures support the records management program and assist in the implementation of the program and its continued success. These policies and procedures govern the retention and destruction of records and are simple to apply across the organization.

BEST PRACTICES: POLICIES & PROCEDURES

- Produce a single set of documented policies and procedures to govern the retention and destruction of business records.

- Establish continuity and disaster recovery procedures.

- Determine procedures for the creation, retention, access, storage, and destruction of all records.

- Create and enforce a corporate-wide e-mail management policy.

- In the event of a future litigation, audit, or investigation, a system of "holds" should be assigned to records subject to legal constraints. Records that are under a "hold" order should not be destroyed even when permitted by the retention schedule.

- Practice annually organized purges of onsite records with the intention of identifying and sending inactive records to off-site storage.

- Define and assign records management related roles and responsibilities within organizations and departments. Create one position that will be responsible for the overall management and administration of the program.

- Institute storage procedures for onsite, offsite, and electronic records.

- Provide program training for all employees on an ongoing basis.

- Identify and protect "vital" records that are essential for the continued operation of the organization in the event of disaster or crisis.
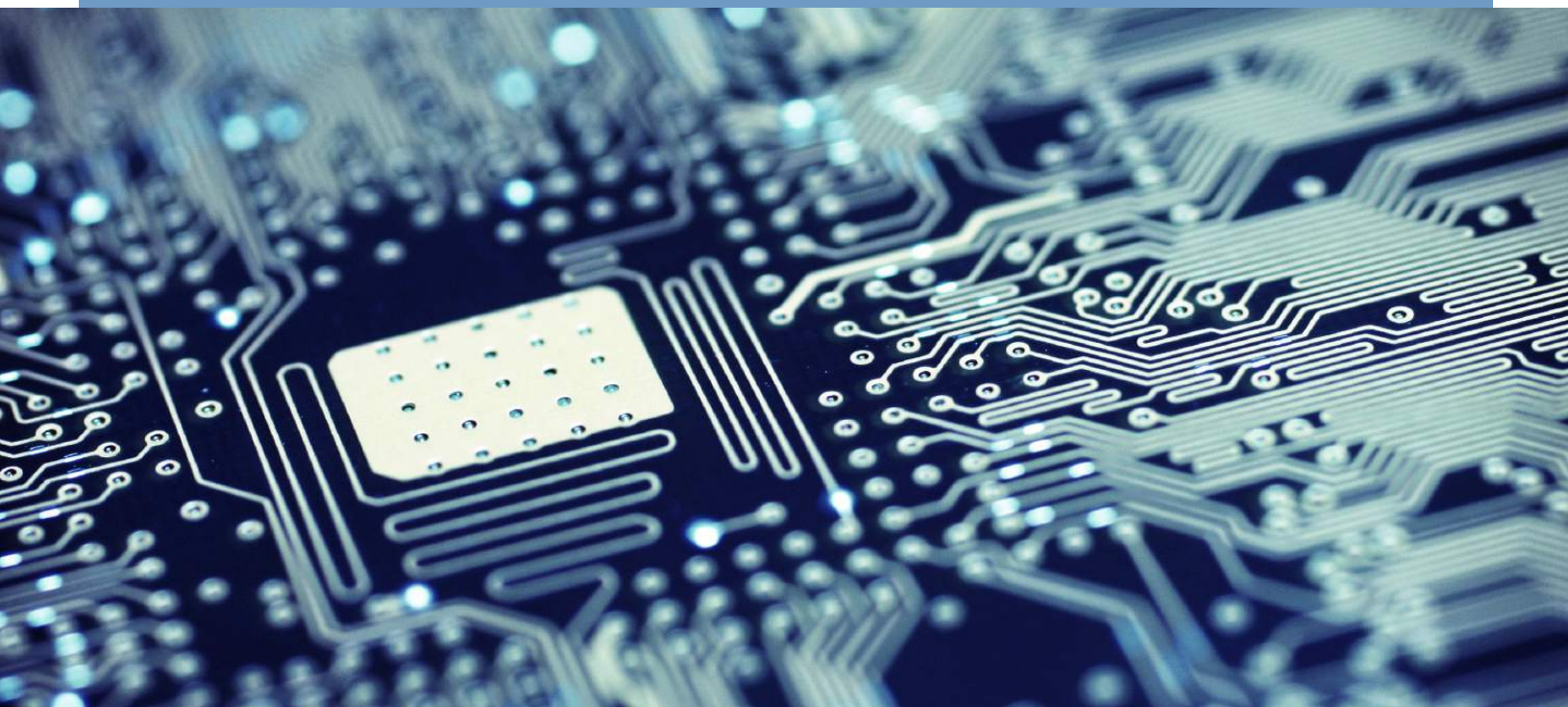
III. Accessing & Indexing

THE SUCCESS OF A RECORDS MANAGEMENT PROGRAM RELIES HEAVILY ON THE ABILITY TO ACCESS THE CORRECT INFORMATION WHEN IT IS NEEDED.

One of the most important factors to consider when creating a Records Management Program is the functionality. Organizations need to be able to locate the correct record in a timely and efficient manner in order for their program to be functional.

One of the simplest ways to ensure that your documents are easily accessible is to flush out your indexing methods. Well-indexed records ensure easy access and reduced time and financial cost. The simplest way to go about properly indexing your records for easy access is to have a third party company index and store your records for you. More on this later, but it is important to have a record of client number to correspond with client names or case names. Companies will work with whatever system you have in place.

BEST PRACTICES: ACCESSING & INDEXING

- All records should be indexed in a systematic manner by subject matter.

- Establish a consolidated records management system that links the organization's records to its Retention Schedule.

- File paper records in filing systems and electronic records in network directories that are categorized by the same record classification scheme and time period.

- Implement authorization processes to ensure the protection of the confidentiality of records.

- Limit individual employee access to records. This will ensure that records are not lost or misplaced.

- Determine the suitable turnaround time for retrieval of different categories of records for onsite, offsite, and electronic records.

- Ensure that storage of records onsite and offsite guarantees security, consistency, accessibility, and confidentiality.

- Create and enforce a corporate-wide e-mail management policy.
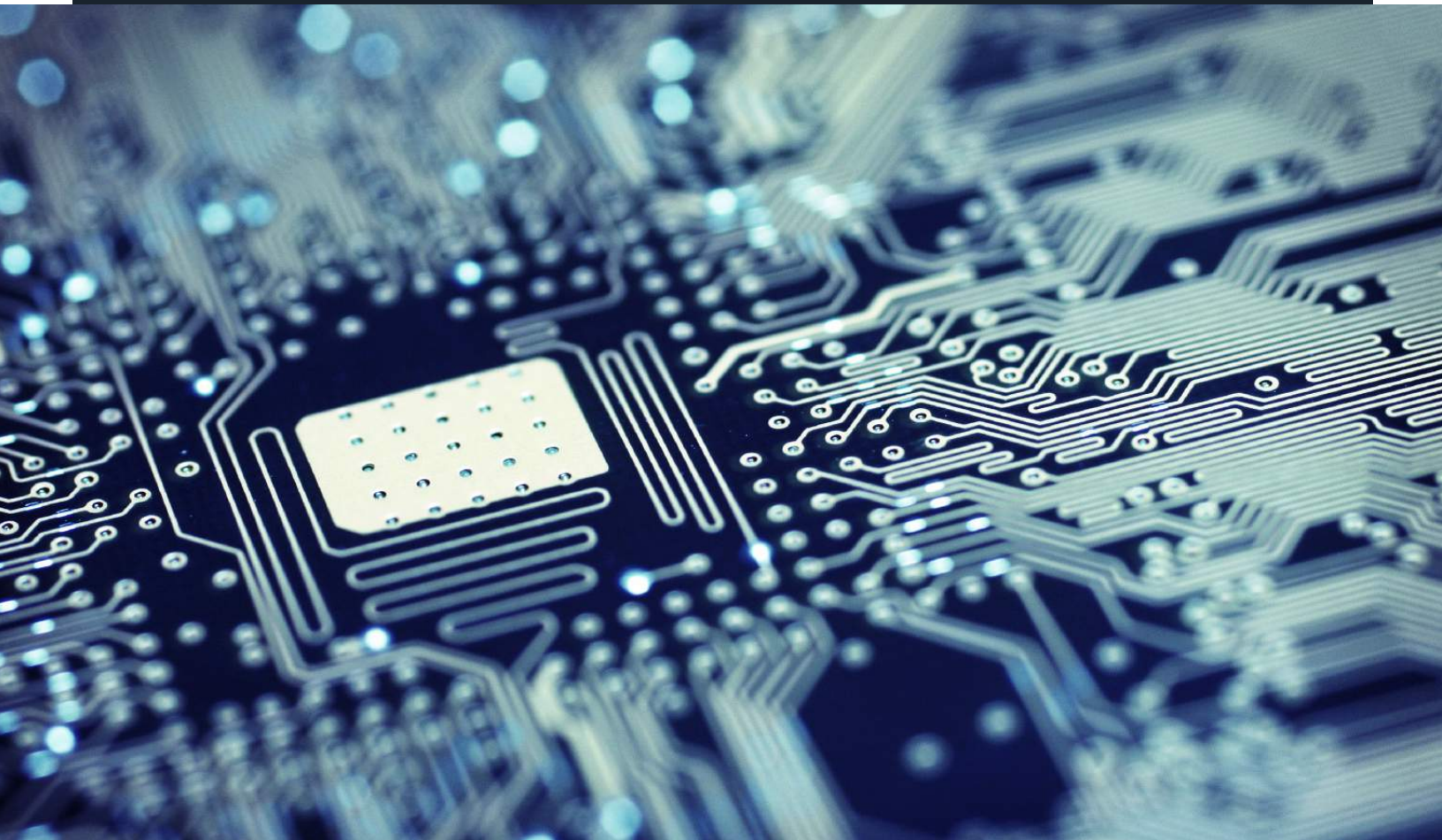
IV. Compliance & Accountability

LONGEVITY IS THE GOAL WITH A RECORDS MANAGEMENT PROGRAM. WITHOUT ORGANIZATION-WIDE ACCOUNTABILITY, THERE WILL BE NO CONTINUITY.

Records ownership at each level of the organization is required in order to achieve compliance. There must be a corporate records manager to administer the program at the corporate level, as well as a designated departmental program manager accountable for the implementation in their division. Each employee that will be handling records should be fully trained and briefed on the program. To ensure compliance, the records management program must be included in the company's internal audit process.

BEST PRACTICES: COMPLIANCE & ACCOUNTABILITY

- Establish a corporate records management program committee comprised of essential program personnelle.

- Schedule committee meetings at appropriate intervals to assess the current state of the records management program.

- Designate a Corporate Records Management to administer the program at each level and to facilitate accountability throughout the organization.

- Introduce measures of performance related to consistent retention and destruction of records, both paper and electronic.

- Introduce records management as part of the company's internal audit process to ensure consistency and compliance are achieved.

- Create a records management acknowledgment program that requires employees to sign a document confirming that they received training and understand the procedures.

V. Destruction

CONTINUOUSLY IMPLEMENTED DISPOSAL PRACTICES PROVIDE RETENTION AND REGULATORY COMPLIANCE AND DECREASE COMPANY RISK.

An established and systematic records retention and destruction pattern will serve as evidence of your organization's attempt to remain compliant with legal requirements. It is important that this step be intentional and organized, so as to look favorable to any governing bodies.

Records disposal and destruction should include both active and inactive records. This element of the records management program should work cohesively with the retention plan and its policies. Standard policies to set policies at the corporate level.

Before a record is destroyed, it should be approved by the body or department that oversees that record. Convenience copies should be destroyed as soon as they have fulfilled their use, while original copies should abide by their retention period.

BEST PRACTICES: DESTRUCTION

- Determine the appropriate disposal method for each record class and media type.

- Institute a consistent and secure disposal system. This could be a third-party document shredder.

- Develop disposal procedures to include approval of destruction, confidentiality and security requirements, and recognition of any documents that have been placed on a "hold".

- Classify documents that contain personally identifiable information about customers and/or employees as confidential and securely shred them. This includes social security numbers, dates of birth, passwords, maiden names, etc.

- Review all official records which have fulfilled or surpassed their retention period in order to ensure that the destruction of these documents complies with all policies and procedures and that the records are free of holds.

- Discard any unofficial records once they have satisfied their purpose. This includes draft documents and memos.

- Under no circumstances should unofficial records be retained longer than the official version of the records.

- Maintain a final destruction listing report that lists record ID number, destroy dates, and the individual who authorized the destruction.

Conclusion

The increase in fines and lost records are tantamount to the fact that compliant records management practices is no longer optional. A program must include a proactive approach for the management of all 5 of the best practices areas: Retention, Policies & Procedures, Access & Indexing, Compliance & Accountability, and Destruction. These categories must be managed consistently and reviewed regularly.

The elements of consistency, accountability, adoption, and accessibility are key and must be reviewed and updated regularly throughout the lifespan of the organization.

The best practices contained in this document provide the foundation for both new and existing programs to become outstanding. By following each section of this document, a comprehensive and compliant program is within reach.

A COMPLIANT RECORDS MANAGEMENT PROGRAM IS DEMONSTRATED DAILY THROUGH BEST PRACTICES