

Records Management Compliance

Much has been written in the press over the past 12 months about the raft of new regulations mandating improved records retention practices which have followed in the wake of recent corporate governance failures.

Compliance with SOX (Sarbanes Oxley) and similar legislation has driven an upsurge in investment in information management technologies. The marketplace is crowded with vendors offering compliance solutions based on old, new, and reconstituted technologies.

Will these technologies enable organisations to achieve the recordkeeping compliance they seek? Probably not.

Vendors of compliance solutions are often inclined to downplay the dependency of their solutions on the non technical aspects of compliance. Records and document management system (RDMS) vendors usually pass responsibility for non technical infrastructure onto their customers, who are unaware how critical the tools and rules are to the uptake and use of the system.

For example, there has been considerable hype in the IT press about Information lifecycle management (ILM). ILM is advertised by the large storage vendors as a breakthrough compliance solution, a silver bullet for IT managers who must retain vast quantities of data that may never be used again, but cannot be immediately destroyed for legislative reasons. While some articles make reference to the need for data (records) retention policies, very few articulate the how necessary these are to achieving a compliant outcome and even fewer suggest how these policies should be developed.

What do we mean by recordkeeping compliance anyway? And what do most organisations expect to achieve?

For many, compliance means not deleting business records before it is legally permissible. This sounds simple but in reality this is not as easy as it looks for the following reasons

Different records have different retention periods. Unless records are identified and categorised into classes it is not possible to apply automated disposal processes. And while significant advances have been made with automated classification tools, the technology is still not ready to take over the responsibility of categorisation for the purposes of records retention management.

Similar records come in many different formats. For example records relating to a legal matter will exist in a range of formats – electronic, including fax and email, and physical files and documents. If the technology purchased is incapable of managing all formats according to the same records retention rules, only partial compliance will be achieved.

Components of information management systems

Technical infrastructure : hardware, middleware database management systems, system software, network components, and the meta data repository.

Non-technical infrastructure: taxonomies, meta-data standards, records retention rules, naming conventions, methodologies, policies, goals and objectives, processes and procedures.

Records are created or received by employees as a normal part of the business process, and therefore the destiny of the record is controlled by the employee – they have the power to either capture records into a management system or destroy records. As many organisations are reluctant to train staff on records management requirements, technology which captures all records at source into a system is an attractive alternative. While this option may succeed in eliminating the destruction of critical records, it typically results in uncontrolled growth through the capture of uncategorized scrap – personal junk, copies and drafts, and records of no or low value. Many organisations have found that “discovering” uncategorized documents in unmanaged document stores is a time consuming and extremely costly exercise.

The alternative of training employees to appraise their business records according to their ongoing value and categorise them to a greater or lesser extent may not be so costly in the long run.

Therefore in seeking a basic level of compliance we have already identified that organisations need to categorise records, manage records within different formats and train users in rudimentary rules of recordkeeping.

The ISO 15489 standard for records management suggests that the enterprise should go much further – developing employ a comprehensive regime where records are controlled within a regime designed to meet community expectation, business and accountability requirements.

Will a technology solution alone assist the organisation to do all this? Highly unlikely. Because as stated a compliant solution is a marriage of non technical elements with appropriate technology to facilitate delivery of the solution.

To make matters worse we are not well served with non technical infrastructure. Although Australia leads the world in establishing products and standards for government recordkeeping compliance, the corporate market is not as well looked after. Consider the following examples:

1. ISO 15489 promotes functional classification for the categorisation of records. However, aside from Keyword AAA, there are very few classification products available on the market and therefore most corporate classification schemes are custom built at considerable cost. There is obviously a need for industry based customisable off the shelf schemes.
2. Similarly we need readily available disposal schedules that match the classification schemes.
3. Few of the commercially available records retention schedules are delivered in machine readable format ready to use with EDRM software.
4. The way in which we write records retention rules needs to be questioned. Current schedules incorporate disposal triggers that are either not machine actionable or are open to interpretation by the user. Extensive mapping is required to match current disposal schedules to available triggers in the software. For example – how do you map a disposal action of “destroy seven years after last action”. At best the date will be calculated on the addition of the last document to a file, at worst when a document on the file was accessed, maybe many years after the file was closed.

5. Similarly many current disposal recommendations can only be applied through user intervention. But few organisations have the resources to retrospectively manage the disposal of files and documents. We could be making use of the inbuilt workflow tools within current software so that disposal rules can be applied to files and documents associated with a particular activity.

The new compliance challenges have stimulated the software developers to develop new technologies. The developers/providers of non technical infrastructure need to be similarly challenged to produce appropriate rules and tools that can be adopted easily by the corporate sector. We also need to increase the level of interaction between these two groups to ensure that the fit of all components in the compliance equation is more appropriately targeted to customer needs.

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Breakout box

Small steps towards recordkeeping compliance:

1. Employ a document naming standard. Make documents identifiable without having to open them
2. Use basic version control numbering in document names.
3. Eliminate drafts and copies when no longer required.
4. Outlaw abbreviations and personalised coding schemes
5. Outlaw personal names for folders on the common drive
6. Build simple classification schemes starting with document types, and lists of commonly used names.
7. Build a business classification scheme (NCS) based on the business functions of the organisation
8. Use the BCS and other classifications to name and organise folders on the network drive
9. Extend the same scheme into shared email and other databases
10. Consolidate by migrating individual databases into shared systems where possible
11. Build and publish a records retention scheme
12. Develop rules for eliminating scrap - junk mail, copies and duplicates, low and no value records
13. Train staff on the above rules

When you've done all of this you're ready to graduate to a fully fledge records and document management system