

7 Tips for Developing an Effective Records Management Policy



An effective records management policy is vital for successfully organizing your paper and electronic documents. It provides the foundation for your RM program by documenting processes for organizing, retaining and accessing records, outlining key roles and responsibilities, and helping your organization meet regulatory mandates. Simply put, this policy should help you get the most out of your RM program and meet compliance requirements.

This governing document should be inclusive of your organization's business objectives, be clearly written, and outline legal rules and regulations. And the key to success is to ensure that staff are actually using the policy. So how do you develop the right one for your organization?

While the answer can partly depend on your organization's governance culture, risk exposures, and communication standards, there are some best practices that can be applied to any business context.

And we've used these best practices to develop 7 tips to help you create the right RM policies for your program.

1. Understand the Needs of Stakeholders

When developing an RM policy, it's important to consult with stakeholders in order to understand the needs of the organizational units most directly impacted by records management requirements and services. Depending on the structure of your organization, possible stakeholder groups might include legal services, facilities, and IT, as well as the core operational groups who use recorded information to meet your organization's primary mandate. It's also important to meet with groups that can provide insights into the day-to-day realities of developing and enforcing a policy, such as human resources, internal audit, communications, and if your organization has one, the policy unit. Such consultations help records management professionals develop policies that respond to business needs and practical challenges. Stakeholder consultations also provide help in "selling" the policy come implementation time. Managers and employees will be much more open to sharing ownership of a policy that they have had a direct hand in developing.

2. Identify Roles & Responsibilities

With the typical business day filled with high work volumes, conflicting priorities, and emerging challenges, managers and employees will approach a new policy with the question, "What do I have to do?" The effectiveness of your RM policy depends on its ability to tackle this question up front. The policy should clearly distinguish roles and responsibilities for the RM program throughout development, implementation and maintenance. Possible roles to be addressed include:

- Senior management program champion or sponsor
- Corporate records manager, records coordinator or equivalent
- Records management super-users responsible for coordinating RM within their own organizational units
- Managers responsible for compliance among their own direct reports
- Other employees who comprise the end users of the RM program

In defining these roles, it is critical to identify the official title of the person who will fill each role. A senior program champion, for example, might be the Chief Information Officer, Corporate Counsel or Chief Operating Officer.

Once these individuals have been established in their respective roles, the next step is to outline their specific responsibilities as clearly as possible. Will the role include any oversight responsibilities or signing authority for processes such as records disposal? Which other stakeholders will persons in the role need to engage? What is the scope of the employee's responsibility for the records themselves – all records in an organization unit, or just those the person creates, retains and uses?

3. Use the right language

Seemingly minor details such as sentence structure and word choice can have a tremendous impact on the effectiveness and enforceability of any corporate policy, RM-related or otherwise.



An effective policy is strong and declarative enough to mandate action across the entire organization but it should not be so dictatorial and inflexible as to alienate readers and risk impeding their daily business activities.

For an example of the impact language choice can have on a policy, think back to your elementary school grammar classes. Your teacher may have described words like must, shall, should, can and may as “helper verbs” because of the way they accompany action-oriented verbs like walk, run or jump. Although these types of words occur in similar positions in a sentence, each one brings a different meaning to it. For example, if a policy states that an employee must apply information security safeguards, then that statement is a legally binding requirement, exposing the organization to potentially serious sanctions for non-compliance. In contrast, the verb should reads as a recommendation rather than a direct requirement, while verbs like can and may suggest that the described actions are completely optional, with no clear mandate to act one way or the other. Which approach is best will depend heavily on the context of the action and the different legal, operational and other requirements that apply to it. The key is to be flexible, and the wording you use should reflect that.

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4. Get Employee Buy-In by Focusing on the Value

A good RM policy will increase the level of care and control applied to records as part of everyday business processes. Inevitably, this will require a certain amount of up front work and convincing staff to adopt the policy can be tricky. The key to getting buy-in, then, is to show a clear and comprehensive value proposition.

In other words the policies should address questions such as why are we doing all these things? What benefits do we hope to achieve? What risks are we trying to avoid or mitigate? There are at least four possible areas to look at when answering these questions:

Records management processes and controls can figure heavily into the quality assurance criteria and other requirements, and failure to receive certification and accreditation under those standards can have severe consequences for commercial businesses and government agencies alike.

Legal Compliance

Don't shy away from citing the titles of key statutes and regulations in the policies. In a working culture filled with deadlines and fast changing priorities, “it's the law” is often an effective argument for adopting any new practice or business process improvement. Some things to highlight when using legal compliance for buy in are:

- Legislation that applies to records management in your organization
- Statutes and regulations that contain explicit mandates on how long to keep records or imply retention requirements in the form of legal limitation periods
- The Sarbanes-Oxley Act, and whether or not your organization is subject to this or comparable requirements around information and reporting
- Privacy laws or evidentiary requirements that drive your organization to apply best practices in information security, retention scheduling, and efficient, reliable records retrieval

Industry Standards

Records management processes and controls can figure heavily into the quality assurance criteria and other requirements of standards such as ISO 9001, and failure to receive certification and accreditation under those standards can have severe consequences for commercial businesses and government agencies alike. Investigate which general and sector-specific standards apply to your organization, along with the accreditation/certification requirements and RM impacts associated with each. As with legal titles, direct reference to



applicable standards can go a long way in motivating managers and employees to implement the records management policy across your entire organization.

Related Policy Directions

If your organization already has a robust governance framework, then demonstrating the value proposition for your RM policy is easier. Are there any policies, standards or strategic planning documents already embraced by your organization which help drive effective records management, either directly or indirectly? For example, commercial companies should look for policies and strategic directives that emphasize effective customer service, operational reliability, or regulatory processes. In a government department or agency, look for government-wide policy mandates on responsibilities and information security, freedom of information, and management accountability. All of those objectives depend on secure, accessible information and evidence-based decision-making, providing potential leverage points for getting buy-in on RM policy development and implementation.

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Business Benefits

Aside from compliance with all the requirements described above, it's important to include the day-to-day benefits managers and employees can realize by implementing the RM policy and the different processes that it mandates. As a records management professional, you may be able to name these benefits easily, but do not expect them to be readily obvious to non-RM stakeholders.

Make sure you describe the benefits up front. Always include the usual RM drivers of cost effective storage, faster information retrieval and more reliable decision making, but don't stop there. Look for opportunities to respond directly to user needs and business challenges

raised during the stakeholder consultation sessions described under Tip #1.

5. Be Prepared to Enforce the Policy

A policy that outlines the basic requirements for developing and implementing an RM program can be an effective informational guide for managers and employees. But should a legal or compliance issue occur, information and guidance are not sufficient to protect your organization. A policy is a legally binding statement of corporate direction, so litigation, audits, and other proceedings can bring the enforceability of the policy under direct scrutiny. An organization does not meet its legal responsibilities by giving people a general idea of how to fulfill requirements—it must also provide reasonable assurance that employees will actually comply with these requirements. One common method of providing such assurance is to describe the possible consequences of non-compliance such as disciplinary action, dismissal, criminal charges, or civil action. Policies should also mandate proactive means of detecting and mitigating possible non-compliance, such as audits, inspections and reviews.

6. Keep it Brief and Simple

With so many different things to keep in mind when drafting an RM policy, it's natural to want to include every conceivable detail for developing and implementing records management processes. The idea isn't to have an excessively long document; rather, it's more about providing a clear directive to improve records management compliance by ensuring employees know how to implement and use RM practices, the rules and regulations and the consequences for not meeting compliance requirements.

Excessively long and detailed policies have two critical flaws. First, people simply will not read a policy if it is too long, much less understand and apply it to daily business. Second, too much procedural detail is not appropriate for a corporate-wide policy. Given the different vetting and senior management endorsements that such policies typically demand, it's impractical to initiate the same process every time there is a minor change in process or procedure. The exact length and level of detail for your RM policies will vary depending on

the governance culture and stylistic conventions of your organization, but one motto applies everywhere: keep policies as brief and simple as possible, provided you cover all the key requirements.

7. Implementation is a Must

Even the best written policies by themselves are meaningless without any action. Once the policy is finalized and endorsed, all individuals with identified roles should begin meeting their responsibilities head on. At the corporate level, this means developing and implementing each process or control described in the policy. For example, if the policy attempts to enforce compliance via an audit process, then perform audits as soon as it is feasible to do so, taking any and all steps appropriate to remedy instances of non-compliance. An effective RM policy provides mandates for action. A good RM program takes that action and turns otherwise ambitious directives into a daily reality that makes records work for business.

Talk to TAB

Applying the best practices described in this article will help records management professionals develop a corporate policy that clearly mandates the different processes and requirements for their RM program.

By consulting with key stakeholders, using clear and simple language and ensuring implementation, you can use records management to help your organization meet its business objectives and safeguard against legal and compliance risks.

If you're interested in learning more about developing policies for your RM program, contact TAB today and one of our consultants will be happy to help.

For more information on TAB's solutions, please get in touch:

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