

Performing Records Management Compliance Assessments

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Compliance Assessment Purpose

- Evaluate employee compliance with records management policies, processes, and systems
- Ensure that records are easily identifiable, protected, and retrievable
- Avoid regulatory or legal sanctions from the loss or misuse of records
- Continuously review and improve business processes
- Ensure changes are addressed in the Records Management Program
 - Regulatory environment
 - Use of technology
 - How the organization conducts business



Compliance Assessment Business Case

- Strengthens the foundation of the records management program
 - Ensures that records procedures and processes continue to meet requirements
 - Ensures that the program is serving the Organization efficiently and effectively
- Demonstrates a commitment to the importance of the program
- Helps to ensure accountability for records management programs
- Helps to mitigate the risk of having a policy without implementation



The Difference Between Assessment and Audit

- **Audit:** “An examination of records or financial accounts to check their accuracy”
- **Assessment:** “The act of appraising, evaluating – a valuation made by authorized persons according to their discretion”





Who Performs the Assessment?

- If the Program and Records Management Group are assessed: Internal Audit or Legal
- If the Program and Policy Implementation are assessed: the Records Management Group & designated business liaisons



Stakeholders of Compliance Assessments

- Records Managers
- Legal Departments
- IT Departments
- Compliance Departments
- Executive Management
- Business Groups/Business Group Leaders
- Shareholders (if applicable)
- The Organization



Assessment Elements

Assessing the Records Management **Program**:

- Validate that the Records Management Policy and Retention Schedule are up-to-date
- Validate that operational procedures exist to support compliance with Records Management Policy and Retention Schedule
- Review that staffing is effectively assigned to support the Program
- Review the controls that are in place to validate compliance with the program



Assessment Elements

Assessing the **Implementation** of the Records Management Program:

- Assesses departmental or employee records management practices in relationship to the program
- Appropriate Classification of Records
 - Do foldering and naming conventions for records exist?
 - Are conventions established on how records are stored electronically and physically?
 - Do taxonomies and record descriptions describe the content of the record?
 - Do naming conventions support application of the Records Retention Schedule?





Assessment Elements

Assessing the **Implementation** of the Records Management Program:

- Procedures for Transfer of Records to Inactive Records Facilities:
 - Is/Who is documenting transfer of records to inactive storage?
 - How are storage locations for inactive records documented?
 - Are records in inactive storage easily identified and retrievable?
- Disposition of Records
 - How is the Records Retention Schedule followed by the department?
 - How are destruction approvals and destruction certifications created and maintained?
 - How are electronic documents disposed of and destroyed? Who handles this?

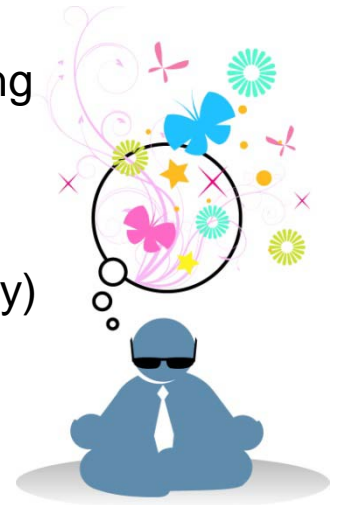




Assessment Elements

Assessing the **Implementation** of the Records Management Program:

- Separated/Transferred Employees
 - Are appropriate steps taken to secure records of separating?
 - Are appropriate steps taken to secure IT resources of separating or transferring employees?
- Security
 - Are records appropriately secured for their purpose (e.g. privacy)
 - Who has access to which documents?
 - Are ethical walls in place where needed?
- Legal Holds
 - How are legal holds and records destruction integrated?





Assessment Methods

- Self Assessments
- Surveys or Questionnaires
- Individual employee interviews
- Group employee/department interviews
- Executive interviews
- Physical review of
 - Department files
 - Network shared drives
 - Individual desktops
 - Records systems
 - Corporate systems
 - All other places where records may be stored.

Assessment Frequency and Findings

Frequency:

- Done in regular intervals; at least annually
- Include routine checks and random self-assessments in between full assessments
- Assessment content and timing should relate to Program implementation

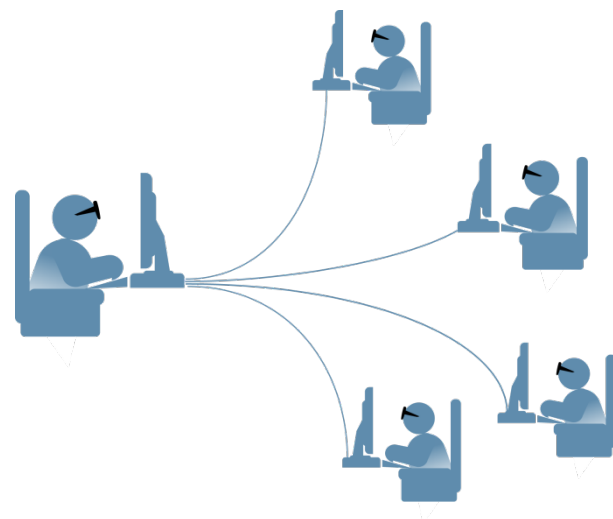
Findings:

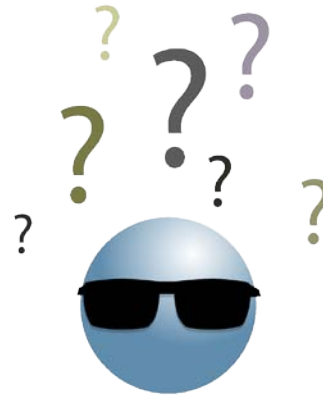
- Reported to Records Department Head, Business Group Leader and Legal/Compliance Departments
- Beware of how findings are documented!



Compliance Awareness

- Employees should receive training in regular intervals
- Training demonstrates commitment to records management
- It increases awareness of employees - and subsequently compliance
- Training should show the consequences of non-compliance
- Training goals should be that employees are fully aware of their accountability





Questions?

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