

# Records Management Best Practices Guide



A Practical Approach to Building a Comprehensive and Compliant Records Management Program

# Protecting and Managing the World's Information.

Since 1951, Iron Mountain has been the partner that thousands of companies depend on to store, manage, and protect records, media, and electronic data in any format, for any length of time.

Today, we continue to lead the industry as the only partner you can trust to design and implement a comprehensive and compliant records management program. We have more expertise, resources, experience, proven processes, and responsive services to meet your information management challenges now and in the years ahead.



The Iron Mountain best practices initiative is a direct response to requests from our customers for guidance on:

- **Best-in-class compliant records management practices**
- **Continual program improvement ideas**
- **Government regulations that impact records and information management**

Now, more than ever, it is critical that organizations have solid records management practices in place for all media across all business units. These practices should feed into a comprehensive and consistently applied records management master plan. Organizations that meet and demonstrate regulatory compliance will be the ones that stand out and are identified as the best in class, while others scramble to protect their corporate reputation and shareholder value.

This Records Management Best Practices Guide represents the collective experiences of hundreds of thousands of Iron Mountain customers — and over fifty years of records management history. From those years of experience, records management fundamentals have been tried and proven true, processes and workflows have been crystallized for greater efficiencies and less exposure, and best practices have evolved to cover the many integral aspects of proper records management. These best practices are provided here as a practical approach to a comprehensive and compliant records management program.

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*Chairman and Chief Executive Officer*  
Iron Mountain Incorporated

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# Introduction

Why Do You Need  
Best Practices for  
Records Management?



A compliant records management program is necessary for organizations to proactively and progressively manage all data, media and information. As the number of laws and severity of punishment governing records management continues to increase, it becomes even more paramount that organizations follow best practices for proper records management. Organizations need to demonstrate “good faith” intentions to follow these best practices consistently and accurately. An organization with a solid foundation of proven successful records management practices will:

- **Preserve the right information for the correct length of time**
- **Meet legal requirements faster and more cost effectively**
- **Control and manage records management storage and destruction fees**
- **Demonstrate proven practices of good faith through consistent implementation**
- **Archive vital information for business continuity and disaster recovery**
- **Provide information in a timely and efficient manner regardless of urgency of request**
- **Use technology to manage and improve program**
- **Integrate policies and procedures throughout organization**
- **Establish ownership and accountability of records management program**
- **Arrange for continuous training and communication throughout the organization**
- **Project an image of good faith, responsiveness and consistency**
- **Review, audit and improve program continuously**

These features must all exist as part of a compliant records management program. Independently, each represents a good practice; as a unit, they serve as a solid foundation of best practices for records management.

# Introduction (cont.)

## Why Is Consistency So Important?

There is one phrase that resonates as a theme for simple and complex aspects of compliant records management programs:

### **CONSISTENCY IS EVERYTHING**

- **Develop a single Records Retention Schedule for your organization and implement it consistently across your enterprise.**
- **Write Records Management Policies and Procedures and apply them consistently.**
- **Formalize records destruction practices and destroy records consistently and systematically.**

These and many other Guiding Principles of Compliant Records Management are listed after each of the five Best Practice areas. Keep your program elements simple and consistent. Your records management program will be judged by the consistency of its implementation, not the details of the program's design.





# Where Do We Start?

The early creation of an executive steering committee comprised of senior management across all departments is instrumental to the success and implementation of a compliant records management program. By creating an active steering committee, your organization will be positioned to proactively address the changing business climate and the ever-increasing regulatory controls for records and information management. The Compliance & Accountability Best Practice section of this guide will provide more information on how to organize for success.

Once your executive steering committee members have been identified, we would suggest they each read and make sure they fully understand the best practices in this guide. We have broken the best practices down to the following five Best Practice areas:

- **RETENTION**
- **POLICIES & PROCEDURES**
- **ACCESS & INDEXING**
- **COMPLIANCE & ACCOUNTABILITY**
- **DISPOSAL**

For each of these Best Practice areas we have included an overview and guiding principles.



# RECORDS MANAGEMENT BEST PRACTICES

# I. Retention

A sound and legally compliant records retention policy, including a Records Retention Schedule is the foundation of a good records management program.

This is the platform for thorough protection of organizational assets and the surest method to avoid risk and litigation.

A Records Retention Schedule is a document that an organization uses to ensure that records are kept only as long as legally and operationally required, and that obsolete records are disposed of in a systematic and controlled manner. A Records Retention Schedule supports an organization's effort to manage intellectual property, control the costs of information storage, locate and retrieve documents for legal discovery, and dispose of records at the end of their business life. Instituting a formal and legally credible Records Retention Schedule enables an organization to meet the legal requirements of mandated retention periods.

The Records Retention Schedule represents all records created by an organization across divisions and functions, regardless of media type (hardcopy or electronic). Retention periods are based on legal, regulatory, and operational requirements. The development of a legally credible Records Retention Schedule is broken down into four activities:

- **Identify major record groups**
- **Create a universal classification scheme**
- **Perform legal research**
- **Overlay operational retention requirements**



## IDENTIFY MAJOR RECORD GROUPS

The first step in identifying major record groups is to inventory each type of record and record keeping system within your organization. A records inventory is a complete and accurate listing of the locations and contents of your organization's records — whether paper or electronic. The scope of the records inventory should extend across business units, formats and systems. Conducting a records inventory is a critical first step because it not only identifies, but also quantifies all of the records created and processed by the organization. Ultimately, the records inventory becomes the basis for preparing the retention schedule. Until you know what you have, it is impossible to establish any type of records program.

Your records inventory should group records into broad categories — called record classes. These classes will form the basis of your Records Retention Schedule. It is also critical that the organization agree at an early stage on the commonality of terms to be used. This will ensure consistent nomenclature and usage for all aspects of the records and information management program.

## CREATE A UNIVERSAL RECORD CLASSIFICATION SCHEME

One of the most important tasks in organizing your records is to establish a record classification scheme. A record classification scheme is a grouping of records by business function, record class, and record type as a way of dealing more practically with high volumes of records. Record classification schemes provide a basis for making correct decisions about records.

Many companies can establish ten (or fewer) broad record functions, such as Operations, Accounting, Financial, Tax, and Legal. These top-level record functions are broken down into record classes, which are, in turn, broken down into record types. The following is an example:

**Record Function:** Accounting

**Record Class:** Accounts Payable

**Record Types:** Accounts Payable Aging Reports, Accounts Payable Distribution Reports, Cash Disbursement Reports



# I. Retention (cont.)

## **PERFORM LEGAL RESEARCH**

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It is important to conduct legal research to determine what the retention period for each record class must be. This work often requires the assistance of legal counsel, consultants or external records management experts.

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

- **Federal**
- **State**
- **Local**
- **International** (if relevant)

Examples of groups that issue such regulations include:

- **Securities Exchange Commission (SEC)**
- **Federal Trade Commission (FTC)**
- **Federal Communications Commission (FCC)**
- **Environmental Protection Agency (EPA)**
- **National Labor Relations Board (NLRB)**
- **Internal Revenue Service (IRS)**
- **Equal Employment Opportunity Commission (EEOC)**
- **Occupational Safety and Health Administration (OSHA)**

## **OVERLAY OPERATIONAL RETENTION REQUIREMENTS**

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In addition to legal requirements, operational retention requirements must also be taken into account. This is the length of time that a record must be retained to meet departmental, operational or user group record needs. The final retention period should be the longer of the two.





## GUIDING PRINCIPLES OF RETENTION

- Adopt one universal Records Retention Schedule that is applied across all business units and that captures all the records, regardless of media, that are created or received by the organization in the conduct of business.
- Create an “E-mail Appropriate” Retention Schedule subset that shrinks and consolidates the available e-mail record classes. This “E-mail Appropriate” Retention Schedule simplifies the e-mail classification and archiving process for employees.
- Support the Records Retention Schedule with legal research that encompasses the specific federal, state and local retention requirements that are applicable to the organization.
- Re-examine the Records Retention Schedule for possible updates and revisions at least every two years, in order to ensure that the classification scheme and legal research are current.
- Review and take into consideration the statutes of limitation and limitation of actions that dictate the period of time in which a lawsuit may be filed or fine assessed when establishing a final retention period for the organization’s records.
- Review and apply to the final retention period, all business or operational requirements for the retention of records.
- Create a Records Retention Schedule at a record class level that identifies broad categories representing the business functions of the organization, rather than all-encompassing departmental listings of records.
- Preserve historical documents in media-appropriate archival conditions.
- Define for each record class, the triggering event (such as a business acquisition, merger or closing); that must occur for a record to become inactive, thus signaling the beginning of the retention period count.
- Categorize business records as either “official” records or “convenience copy” records. The Records Retention Schedule governs the retention period for the “official” records. “Convenience copy” records are typically retained for 30 days, but not longer than one year. “Convenience copy” records should be destroyed when they no longer have business value.
- Put into place a process that requires employees to classify and retain e-mails that are official records. As part of this process, implement an automated e-mail warning system to force employees to review and make a decision about e-mails in their mailbox. All e-mails that are not classified should be purged according to a predefined schedule.
- Reduce the number of records that have no ongoing business value or usefulness in order to reduce risk and cost. Conduct corporate-wide annual reviews of onsite records to determine those that are no longer active. Inactive records may be sent to off-site storage.
- Identify vital or “mission critical” records that are essential to protect the financial, legal, and operational functions of the organization and its customers, employees, and shareholders.
- Establish a process to rollout and implement the Records Retention Schedule to include initial and ongoing training programs for all employees within the organization.

## II. Policies and Procedures

An organization's records management program should be supported by policies and procedures that address each component of the records management program in accordance with operational and legal requirements.

An organization may have separate policies and procedures for records retention, active file management, inactive file management, vital records, e-mail management, and any other area of records management. Policies and procedures set standards and serve as evidence of management's support of and investment in a compliant records management program. They should address ALL records regardless of media type, making sure to include positions on electronic records and e-mail practices. Records management program guidelines must be consistently and univer-

sally applied. Roles and oversight responsibilities are to be designated and defined. Policies and procedures should be accessible and communicated clearly and consistently throughout an organization. When employed properly, they work in conjunction with an organization's Business Continuity Plan and Disaster Recovery Program.





## GUIDING PRINCIPLES OF POLICIES AND PROCEDURES

- Produce a single set of documented policies and procedures governing the retention and destruction of business records and apply them consistently.
- Establish organization-wide records management policies and procedures for records of all media types.
- Establish business continuity and disaster recovery procedures.
- Determine procedures for the creation, retention, destruction, access, and storage of electronic records.
- Define and outline the handling of official versus convenience records and active versus inactive records.
- Create and enforce a corporate-wide e-mail management policy that includes components such as:
  - A clear statement that e-mail content belongs to the company
  - Defined limitations on personal use of e-mail
  - Expectations that there is no privacy of corporate e-mail
  - Clear definitions of what is and is not appropriate e-mail content
  - Password and encryption standards for the company
  - Employee sign-off that they have read and understood the policy
- Outline records disposition policies and procedures as an established pattern of systematic document retention and destruction. This prohibits selective destruction of records.
- Align backup policies with e-mail retention policies.
- Develop information security measures to ensure compliance with privacy requirements.
- In the event of litigation, audit, or governmental investigation being commenced at some point in the future, 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 organization’s Records Retention Schedule.
- Institute annual organized purges of onsite records with the intention of identifying and consequently sending inactive records off-site to storage.
- Establish an annual audit of the company’s records management program.
- Define the records management related roles and responsibilities within an organization including those for the Steering Committee, department managers, company employees, tax, legal, IT, and internal audit departments, and create a position that will be responsible for overall records management administration.
- Institute storage procedures for onsite, off-site, and electronic records.
- Provide records management program employee training on an ongoing basis and distribute the records management program policies and procedures to new employees.
- Establish and enforce employee accountability for the compliance of the records management program. This can be done by including it as an element in performance appraisals and instituting disciplinary actions for violations.
- Identify and protect “vital” records that are essential for the continued operation of an organization in the event of a disaster or crisis.

# III. Access and Indexing

The success of a records management program hinges on the ability to access information for business support, litigation response, or compliance reasons.

Organizations need the ability to access records by multiple indexing parameters such as subject matter (content and context), record creator, intended recipient, date, etc. Proper indexing methods are one of the easiest ways to recognize significant returns on investment. Well-indexed records ensure easy access and reduced time and financial cost. Poor indexing methods will result in additional fees and more labor expended. The inability to satisfy record retrieval requirements can result in major fines, increased litigation, and the degradation of overall service quality within an organization.

Access and indexing are dependent on one another because records must be properly organized to enable timely, accurate, and controlled access. Just as an index in a book directs the reader to a specific page, a records index directs the record user to a particular place where the required information is located. The location may be a paper or microfilm filing system or an electronic storage location, such as a network directory or electronic document management system. Once the record location is identified, access can be authorized by various security controls.

Storing e-mail and other electronic records on backup tapes will not meet regulatory, legal and business access requirements. Backup tapes are designed for disaster recovery; they were never designed for retention, legal discovery or low-cost, long term archiving of electronic records. E-mail records should be migrated to a digital archive designed for low-cost, long term archiving. This archive should have tools for easy searching, discovery organization and retention management.



## GUIDING PRINCIPLES OF ACCESS AND INDEXING

- All records should be indexed in a systematic manner, by subject matter, regardless of the storage medium or location.
- Establish a consolidated records management system that links the organization's records to its Retention Schedule through a record classification scheme.
- Populate the record classification scheme (also known as a taxonomy or file plan) with standard indexing parameters to include record class code, business function, record creator, dates, and other applicable indexing parameters.
- File paper records in filing systems and electronic records in network directories that are categorized by the same record classification scheme and time period.
- Identify records in all media by conducting searches of the record classification scheme. (See record classification scheme on page 13.)
- Implement a proper authorization process to ensure protection of the confidentiality of an organization's records, maintain the confidentiality of customers' personal information, and prevent unauthorized disclosure to third parties.
- Limit individual employee access to records unless it is necessary in order to conduct authorized business and is approved in accordance with established organizational practices and procedures.
- Develop an annual formal review of the records management system, record classification scheme and centralized index to validate that structure is consistent, accurate, appropriate and reflects any changes in business.
- Determine the suitable turnaround time for retrieval of different categories of records for onsite, off-site, and electronic records.
- Ensure that storage of records onsite and off-site guarantees security, consistency, accessibility, and confidentiality.
- Migrate electronic records to a digital archive that can provide secure access to e-mails and instant messages for regulatory, legal or future business purposes.

# IV. Compliance and Accountability

The benefits of a major investment in an enterprise records management program will be short-lived if employees are not in compliance with the program and its policies. The critical components for compliance are organization-wide accountability and auditing.

## **ORGANIZATION-WIDE ACCOUNTABILITY**

Records ownership at every level of the organization is required to achieve compliance. Without senior-level sponsorship and commitment, the program is bound to fail. There must be a corporate records manager to administer the program at a corporate level as well as a designee in each business unit accountable for implementation in their division. Finally, each employee should be required to acknowledge that they have read and understood the records management policies and procedures.

## **AUDITING**

To ensure compliance, the records management program should be integrated into the organization's internal audit process. Key program components that should be periodically audited include:

- **Destruction timeliness**
- **Retention schedule accuracy with the latest laws and regulations**
- **Classification accuracy and completeness**
- **Business unit compliance**
- **Hold administration**
- **Program training and communications delivery**





## GUIDING PRINCIPLES OF COMPLIANCE AND ACCOUNTABILITY

- Establish a corporate records management program Steering Committee comprised of a designated records manager and representation from legal, IT, finance, tax, human resources, and risk management, to be responsible for overseeing the records management program, providing high-level management, strategic insight, and oversight of the program.
- Schedule Steering Committee meetings at appropriate intervals to assess the current state of the records management program. Specific responsibilities include providing high-level management and oversight of the program; assuring that the records management program is properly maintained and updated; and recommending staff and system resources.
- Designate a Corporate Records Manager to administer the program at the business unit or department level to facilitate accountability throughout the entire organization.
- Support the records management function with the appropriate resources and experts internally and externally.
- Regularly communicate records management program information to employees via a company newsletter and use of an Intranet site.
- Introduce measures of performance related to consistent retention and destruction of records, both paper and electronic.
- Include records management as part of the company's internal audit process to ensure that consistency, compliance, and legal requirements are met.
- Audit compliance adherence to corporate electronic records, e-mail retention and deletion policies by involving the IT department.
- Create a records management acknowledgement program that requires employees to sign a document confirming their receipt of training and understanding of records management policies and procedures.

# V. Disposal

Consistent disposal practices provide retention and regulatory compliance and decrease corporate risk when conducted in accordance with an approved Records Retention Schedule.

An established pattern of systematic records retention and disposition serves as evidence of an organization's good faith in attempting to conform to the law. Haphazard patterns of records disposal may appear suspicious and can suggest that unfavorable or embarrassing records were destroyed intentionally.

Records disposition should be an inherent element of an organization's overall records management program and should cover both active and inactive records. Standard policies should be set at the corporate — not department — level and be reviewed by legal and compliance professionals. The implementation of the policies should be treated as a consistent process, not an event, because they will need to keep pace with organization growth and regulatory changes.

Upon expiration of a record's required retention period, all records identified as eligible should be approved for destruction unless there is a legitimate business reason to postpone that destruction. The official version or "record copy" of a particular record should be maintained for the longest approved retention period subscribed in the Records Retention Schedule. Any unofficial or "convenience copy" of a record may be destroyed once it has met the business need for which it was kept. For example, the official version of an expense report may be required for the completion of an organization's tax audit. However, specific departments or individuals may keep copies within their offices for convenience. Once the need for those convenience copies is complete, those versions of the record may be destroyed.



Records that are subject to litigation, government investigation, or audit cannot be destroyed even when permitted by the Records Retention Schedule. Procedures should be in place stating that the destruction of relevant records must be temporarily halted until such time as official notification is provided that destruction can resume. Documentation of records disposal should state the record's information and when such records were disposed. Proper and regular disposal of records reduces storage and labor costs associated with unnecessary maintenance of records retained past their retention requirements.

The proliferation of privacy laws, in the United States and in other global jurisdictions, is impacting the way in which companies conduct business, especially in how they protect records. The protection of such records includes requirements for secure destruction. An organization should develop and implement a special program for confidential records destruction. This is especially critical regarding vital organization information, such as sensitive internal documents, patents, proprietary and trade secrets. The program

**Non-confidential records may be disposed of by using a variety of recycling methods. However, confidential records should always be securely shredded to ensure that there is no risk to the organization from the possible release of confidential information.**

should ensure that there are consistently applied procedures for properly identifying and disposing of confidential records once they are no longer needed. The program should be communicated and assessed throughout the entire organization.



# V. Disposal (cont.)

## GUIDING PRINCIPLES OF DISPOSAL

- Determine appropriate method of disposal by records class or media type.
- Institute a consistent and secure system for the disposal of records in accordance with an approved Records Retention Schedule.
- Develop disposal procedures that demonstrate authorization, adherence to confidentiality and security requirements, and recognition of suspended records or those on “hold”.
- Distribute to necessary parties for their review all records pending disposal according to the organization’s Records Retention Schedule and ensure that authorization for disposal is confirmed.
- Classify as confidential and securely shred any records that contain personally identifiable information about individual customers or employees. Some examples of this data include social security numbers, date of birth, bank account information, Personal Identification Numbers, passwords, drug prescription information, mothers’ maiden names, etc. Any records that contain personal information should be classified as confidential and shredded to protect the privacy of employees, shareholders, customers, patients and other individuals. This will also protect the organization from liability.
- Ensure that employees are aware that premature destruction of records is expressly prohibited, and if intentional, may result in disciplinary action, up to and including termination of employment and possible civil or criminal liability.
- Review all official records that have fulfilled their retention period to ensure that their destruction complies with the standard policy and procedures and that the records are free of all retention holds.
- Discard, once they have fulfilled their purpose, any unofficial records. Draft documents should be disposed of as soon as they have been superseded by an official version.
- Under no circumstance should duplicates or drafts (unofficial records) be retained longer than the official versions of the records. When records are approved for destruction, all copies in the possession of employees in all media and formats must also be discarded.



- Suspend all regularly scheduled destruction of relevant records (including e-mail records) when it becomes clear that there is a possibility of litigation, audit, or governmental investigation being commenced at some point in the future by or against an organization. In order to prevent these records from being inadvertently destroyed, a system of “holds” should be assigned to records subject to these legal constraints. Records that are under a “hold” order cannot be destroyed even when permitted by an organization’s Records Retention Schedule. Give departments review deadlines from the date of receipt of the report of records eligible for destruction and Department Managers should provide justification why specific records should not be destroyed.
- Review destruction reports periodically that list records at off-site storage vendors that are eligible for destruction. Tax, Legal, Accounting, Internal Audit, Risk Management, and Regulatory Compliance departments should also review the listings. At a minimum, this should be done annually.
- Maintain a final destruction listing report that lists record identification number, destroy dates, and who authorized the destruction.
- Institute consistent and appropriate disposal practices for records residing at both onsite and off-site locations.
- Migrate e-mail and instant message records to a digital archive that is designed to apply the Records Retention Schedule to the stored electronic records, and purge them at the end of their retention period.
- Review records documenting the organization’s past, its development, significant events, and key personnel to determine if they should be designated as “historical records” to be maintained in an organizational archive rather than destroyed when the legal and operational retention period has expired.

# Conclusion

## The need for compliant records management best practices is demonstrated daily in all businesses.

The escalating fines to organizations cited for poor corporate record keeping are a testament to the fact that compliant records management is no longer optional. A program must contain a proactive approach for management of all of the five Best Practice areas — Retention, Policies & Procedures, Access & Indexing, Compliance & Accountability, and Disposal. These areas need to be managed consistently and effectively. Organizations are now judged on the implementation of their records management programs and they must strive to demonstrate “good faith” efforts across all aspects of records management.

A compliant records management program must demonstrate the key elements of consistency, accountability, adoption and accessibility. These elements must be audited and updated consistently over the lifespan of the business.

These best practices and guiding principles provide the foundation for driving existing programs from sub-standard to stellar. Mediocre plans and processes do not constitute compliant records management programs. By striving to achieve excellence one step at a time in each of the five Best Practice areas of records management, a comprehensive and compliant program can be implemented.

With over 50 years of experience in the field, Iron Mountain is the partner more companies trust worldwide to design and implement a comprehensive and compliant records management program.





## IRON MOUNTAIN SERVICES



### RECORDS MANAGEMENT

Iron Mountain provides compliant records management solutions to manage and protect your information assets. Our records management programs ensure that your business records are secure and easily accessible. We offer specialized services tailored to your unique needs.



### SECURE SHREDDING

Given the confidential nature of business records, it's important to ensure complete destruction. Our secure shredding services help you to protect the privacy of your company, employees and customers.



### DIGITAL ARCHIVING

Our Digital Archive service group offers compliance and records management solutions for today's leading organizations. We provide SEC-compliant digital archiving, supervision and data restoration and electronic discovery support services. With our extensive records management expertise we can help institute a comprehensive and compliant records management solution.



### DATA PROTECTION

Whether physically transporting and vaulting your backup tapes at one of our secure facilities or backing up your data through a secure Internet connection with Electronic Vaulting, our comprehensive data protection and disaster recovery services place your information off-site, off-line and out-of-reach; yet the data is accessible whenever and wherever you need it.



### VITAL BUSINESS RECORDS

Our climate-controlled, secure facilities are designed to protect irreplaceable documents like original deeds, wills, trusts, contracts, patents, and other notarized and certified records for you.



### CONSULTING

Today's business world demands that companies follow sound, consistently applied records management practices. Let our consulting professionals review your current records management program, help you determine which records you need to retain, and create an appropriate retention schedule and records classification program for each.

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