Records Management

Visibility and control over your organisation's Records

April 2022

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The exponential growth in the amount of information that organisations generate and manage on a daily basis means that organisations are creating, receiving and maintaining records with increasing value, volume and sensitivity.

Records, both physical and electronic, are a fundamental tool that organisations rely on to conduct business, work effectively and to build knowledge. While you might be familiar with the concept of Records Management, many organisations are not aware of the regulatory requirements and business benefits associated with a robust Records Management Programme.

Regulations such as the General Data Protection Regulation (‘GDPR’) as well as employee and public pressure to safeguard records means that organisations are held accountable for good Records Management.

Organisations can address this by implementing a Records Management Programme including a Records Management Policy and Retention Schedule, to ensure their records are managed effectively and in a safe and secure manner. In this white paper we present the case studies of two Irish organisations that used our recommended approach to Records Management to update and implement their Records Management Policy and associated Retention Schedule.

Implementing a Records Management Policy and Retention Schedule can seem like a daunting task however with the right approach and tools it can be a painless exercise, which will result in great gains for your organisation including increased organisational efficiency, compliance and standardisation.

On the next slide we outline our recommended approach to a Records Management Programme and the reasons why good Records Management benefits your organisation.

What is Records Management?
Records Management is responsible for the efficient and systematic control of the creation, receipt, maintenance, use, storage, transfer, archival and disposition of records, including processes for capturing and maintaining evidence of and information about business activities in the form of records.

What is classified as a Record?
The International Records Management Standard (ISO 15489) defines a record as: “Information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business.”

Is my Records Retention Schedule part of my Records Management Strategy?
An organisation’s Records Retention Schedule is intrinsically linked to its Records Management approach. All records have a lifecycle, which starts with its creation or capture, then moves on to its maintenance, use, storage and transfer by the organisation, and then to its archival and destruction. An organisation’s records Retention Schedule will be informed by the industry it operates in and the various regulations and legislations applicable to the information it stores in its records.
Records Management:
How to do it?

Our recommended approach to a Records Management Programme is outlined in the four Stages below. In the following pages, we walk through two examples where we applied this Approach with two Irish organisations.

**Stage 01 | Planning**

Develop an understanding of the types of records your organisation handles and the organisation’s current Records Management maturity. **Collate any existing Records Management documentation** including Policies, Retention Schedules and the organisational structure.

**Stage 02 | Gap Analysis & Execution**

Assess the ‘current state’ of the Records Management documentation and **document** your organisation’s Records Management Inventory by **conducting** collaborative **workshops** with key stakeholders. **Draft the new Records Management Policy** and Retention Schedule.

**Stage 03 | Implementation**

Implement the new Policy and Retention Schedule using a **Communication and Action Plan**. Conduct **organisation-wide training** of the improved Records Management practices, to help **embed an organisation-wide approach** to Records Management.

**Stage 04 | Ongoing Monitoring**

Conduct **continuous monitoring** on your organisation’s Records Management practices. Incorporate **feedback** into the Records Management Policy and Retention Schedule on an ongoing basis.

**Why does Records Management benefit my organisation?**

Implementing a **Records Management Programme** is a smart decision for any organisation because it will address various Regulatory Requirements and reward the business for its efforts with increased employee and customer trust. By implementing a robust Records Management Programme you will see the following benefits:

- A comprehensive **‘Records Management Inventory’** providing a single source of truth of all Records created, received and maintained throughout your organisation;
- Your ‘Records Management Inventory’ will provide a **helicopter view of the full suite of Records** used by your organisation and provide the basis for establishing an appropriate and compliant Retention Schedule;
- A **reduction in Redundant, Obsolete and Transitory (‘ROT’) data** resulting in cost savings relating to storage and the knock on advantage from an Environmental, Social and Governance (‘ESG’) perspective;
- The ability to **interrogate records** to build a comprehensive view of customers or suppliers, etc.,
- Your ‘Records Management Inventory’ and ‘Retention Schedule’ is a **key tool to help you comply with two of the key GDPR principles**, data minimisation and storage minimisation;
- You will **empower your employees to take responsibility for good Records Management** resulting in improved Records Management practices;
- Your employees will know where to find records due to improved Records Management practices across the organisation, resulting in improved efficiency and effectiveness and an ability to respond to Regulatory requirements such as Data Subject Requests (GDPR);
- Informed Stakeholders across the organisation with clear Records Management roles and responsibilities laid out in the **Records Management Policy** and;
- A Records Management Policy establishes an organisation wide approach to Records Management ensuring that the policies are implemented and maintained and subsequent efficiencies gained.
Case 1

Records Management & Culture

In parallel with the exponential growth in scope, responsibility and workforce, this organisation undertook a Records Management Programme with the support of KPMG, to define, replace and improve all of its procedures, management information reporting and records management systems. At this organisation, there are four key drivers for its Records Management Programme:

- **Large Volumes of Data**: Due to the large volumes of data including personal data that the organisation must collect in order to meet the legal, regulatory, fiscal, operational and archival/historical needs, Records Management was seen as a critical activity to ensure the organisation fulfils its regulatory obligations and assists in the maintenance of a complete and accurate set of records.

- **Regulatory Considerations**: This organisation was conscious of its responsibilities under the GDPR and understood the necessity of a Records Management Policy and Retention Schedule to support them in achieving compliance with their GDPR obligations.

- **Growth in the organisation**: The organisation recently underwent significant growth in headcount and the business was aware that a standard, consistent and embedded approach to Records Management would be critical if the organisation is to have full visibility and control over their suite of records.

- **Increase in organisation responsibility**: The organisation also became responsible for additional functions which were previously a shared service with another organisation. This meant that records were due to be migrated across to the organisation’s systems and it was imperative that no information was compromised.

### The Culture Aspect

Despite these strong drivers, it is not straightforward to build a solid stand-alone business case for a **Records Management Programme**, such as the one at this organisation. Trying to **change the ways of working** in an organisation with many highly-skilled professionals, some of whom have been in their jobs for quite some time, is always a challenge. This Records Management Programme proved to be no exception. We found that clearly communicating the benefit of Records Management really helps to empower employees to take ownership of and pride in good Records Management.

The Programme benefits from strong support and commitment from the board of management and management personnel, and a clear communications campaign. One of the tools we used to support this message was a **Communications Pack** shared with Senior Management.

### Benefits seen by employees which supported the successful execution of this Records Management Programme:

- **Time saved** – employees recognised that they would save time in their day to day work if there was clear and consistent guidance regarding where they should save records and how records should be tracked if moved around the organisation.

- **Accuracy** – it was agreed that clear guidance on version control and sharing of information would enable employees to always work off the latest and most accurate record and prevent out of date information being relied on.

- **Clear retention guidance** – many functions identified their desire to delete records but did not know when it was appropriate to do so and were keen to get definitive guidance on retention periods from this Programme.

### Interesting statistic!

A recently conducted survey by KPMG globally, shows that when clients across 10 countries were asked if their personal data deletion practices are effective, the answers clearly showed a gap and a clear need for a Records Management Programme.

- **50%** Partial
- **30%** Yes
- **20%** No

**Clients in Germany and Switzerland** were the only responders to state ‘Yes’, that their personal data deletion practices are effective and credited Regulators giving a strong boost to this issue.
The purpose of this project was to perform a Current State Assessment of the records managed and held across this organisation. The objective of the project was to ensure that this client fulfils their regulatory obligations and maintains a complete and accurate set of records. This project was conducted in line with our recommended Records Management Approach including gathering information on the organisation’s current state Records Management maturity, conducting workshops with the relevant business units and consolidating the findings and recommendations.

**Records Management – Current state Assessment**

Our **high level findings** from the ‘As-Is Assessment’ included:

- There were no clear roles and responsibilities across the organisation relating to Records Management;
- A cultural change is required to alter employee behavior regarding Records Management;
- Policies and procedures are not up to date;
- Records Management policies and procedures that exist are not followed by staff and implementation is currently not enforced;
- There is a strong reliance on paper records for certain processes. There is a risk to the organisation if these are lost or destroyed; and
- Large amounts of information were retained indefinitely at this client despite lack of legal, regulatory or business reasons for that level of retention.

**Summary Findings**

**Next Steps**

The illustration below outlines the Roadmap to Records Management maturity from initial ‘Assessment’ to ‘Implementation’ of a Records Management Programme. This roadmap allows organisations to benchmark their current Records Management maturity level and define a path to improved Records Management maturity.

Following this project, the organisation was trending between stages 1 ‘Assessment’ and 2 ‘Records Management Inventories’ stages of maturity. Their goal over the next 18 months is to implement the findings and recommendations from this Records Management programme and to achieve a maturity between stages 3 ‘Records Management Policy’ and stage 4 ‘Records Retention Schedule’.
One of the key challenges organisations struggle with is the ongoing generation of information and records across multiple and disparate formats, from structured formats like databases to unstructured formats like documents and notes, audio files and images.

Most organisations have a significant quantity of historic electronic records, and are generating more daily. Organisations struggle to understand what data is held, where it is held and the risk and sensitivity in their records.

**Typical technology challenges centre around:**
- Automating discovery to build an understanding of the size and shape of the problem to support comprehensive data governance;
- How to implement a Policy on an ongoing basis;
- Retrofitting or beginning to use Records Management tools to apply policies;
- Dealing with systems that do not routinely support Records Management goals;
- Determining how the Records Management policies will influence current and new technology;
- Dealing with both structured data and unstructured documents and content; and
- Introducing Cloud systems and storage solutions.

Within a Records Management Programme Technology can play a significant role in both understanding the challenge and applying the Records Management controls needed to enforce policies.

**How Automated Discovery Tools can be leveraged:**

Technology can play multiple roles from Discovery and Classification of records, to a deeper understanding of the record content to determine risk and sensitivity. Technology supports enhanced Data Governance and early Planning and Gap Analysis stages of a Records Management Programme.

Augmenting the Current State Assessment with technology driven discovery and analysis can help validate and guide an inventory exercise, contributing crucial insights into the type, volumes and purpose of information. Identifying redundant, duplicate and obsolete information can crystalise data cleansing needs and drive changes in the Implementation Stage and beyond.

Artificial Intelligence enables automated processes to support Records Management.

Artificial Intelligence breaks the reliance on manual interventions and enables automated combing through content and data, to discover and classify the significant volumes of electronic information organisations accumulate.

Further, sophisticated Entity Resolution techniques enable linking of records across multiple systems to build a true institutional view of connected information.

**How to address unstructured data challenges:**

Many organisations face the challenge of managing large volumes of unstructured data (documents, pdfs, notes, emails, etc.) distributed across multiple formats, systems, file servers and email servers. Manually reviewing this data is complex, costly and prone to inaccuracy, making this data difficult to manage and govern.

KPMG’s Intelligent Data processing solution combines our deep Records and Data Management, Governance, Risk and Controls capability, our Regulatory Domain expertise and sophisticated AI enabled technology to provide an end-to-end solution to effectively manage Enterprise unstructured data. We provide deep, granular insights to drive robust remediation actions and develop an ongoing unstructured management process supported by technology.

KPMG has partnered with Getvisibility, a powerful, AI enabled technology which scans and classifies large volumes of data held in many locations, to support clients in addressing their unstructured data challenges. The key steps in our unstructured data processing solution is outlines below. Getvisibility technology is utilised in performing steps 3 – 5.
What impact will Cloud have on my Records Management?
Cloud first and cloud born organisations have the advantage of seeking Records Management functions within the Software as a Service solution they use. The increased focus on security and data loss prevention when using cloud systems can often drive a focus on having a comprehensive set of controls. Organisations with hybrid models may need to consider a wider range of tools to control both on-premises and Cloud systems.

Where will Technology help my Record Management Strategy?
Organisations with significant quantities of legacy information need to look to technology to both quantify and often cleanse the information, retrofitting policy points and standards in preparation for operations. Artificial Intelligence is now playing a role in both grappling with legacy information and enforcing policy in operations. Further, the same capability supports effective data governance on an on-going basis, as new records are created.

Will my Technology need to change?
There will almost always be a degree of change needed to apply controls and leverage automation. The extent will depend on the individual organisation, its technology landscape and goals. Automating some or all of the record management controls can bring beneficial operational efficiency's and promote consistent compliance processes. Once a Record Management Strategy is established any future technology systems need to address control requirements from the design stage onwards.

Next steps: A multi-pronged approach to Records Management
During business operations technology can play a positive role in ensuring Records are correctly managed over their lifecycle. However, this can require a multi-pronged approach as well as support from the software systems within the business. Automated controls are needed to ensure information is correctly tagged, flagged and managed, in line with policy, over its entire lifecycle.

Legacy solutions may not support the Record Management goals and supplemental plugins or workaround strategies may be needed. Crafting a solution can require design analysis and there is often a journey for organisations towards the optimised and pragmatic solution.

Setting out a targeted technology Roadmap within your Records Management Programme will help the organisation to envision the degree of automation and efficiencies that can be introduced. Prioritised investment in automation and careful safeguarding of record management principles in the architecture governance processes are key elements to ensuring your policies are respected and enforced on an ongoing basis.
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