Evolving the Records Management Culture: From Ad Hoc to Adherence

Implementing an enterprise-wide records management program requires executive-level support, communication, training, incentives, and an action plan that will motivate employees to give up their ad hoc methods and adhere to program policies and procedures.

Patricia Daum, CRM

Prior to implementing a records management program, an organization is dependent on its staff members to manage records through ad hoc and person-dependent methods. They may be using technologies that are not designed to accommodate and enforce retention schedules, and they may be maintaining records in systems that suit their various departmental needs but not the organization’s requirements for enterprise-wide records retrieval and use. In today’s business environment, with its prevalence of electronic documents and e-mail messages, this culture puts organizations at risk for their practices surrounding records retention and regulatory compliance and results in lost productivity and extra costs for records storage and maintenance.

Even after developing new records management program policies, procedures, and retention rules, an organization’s records management culture will need to evolve to close the gap caused by embedded personal work habits and department silos if it is to have a successful enterprise-wide records management program. Eliminating this gap is accomplished by creating understanding and awareness among all staff members, training, and implementing enabling technologies so employees will be personally motivated to undertake new practices in compliance with the new policy and procedures.

Policy Development

Evolving the records management culture starts with policy development. A policy is a statement of standards and guidelines necessary for the organization to perform its mandated functions. Policies guide the organization’s decisions and actions. As records management is an enterprise-wide business process that spans all departments, the policy must be developed at the highest level of the organization (i.e., approved by the governing committee or group).

The records management policy must assign accountabilities to the appropriate level of staff. The policy, therefore, should

- State the purpose of the records management policy
- Define key terms
- State what staff positions are responsible for, including, for example:
  - The integrity of records at the creation phase
  - The comprehensiveness of case files
  - Intellectual and physical records maintenance controls
  - Authorizing records destruction (at a minimum, in the department and within the central records office)
  - Suspension, when needed, of scheduled records destruction
  - Designating of the records custodians within a department
  - Accountability for maintaining records series (reference to the classification and retention schedule)

A policy crafted to address records management accountabilities will eliminate a situation in which an employee can claim that he or she is unaware of his or her responsibilities or argue that “records management does not apply to my position.” Because all employees create, maintain, and use electronic and paper-based records, the policy does apply to each employee. The policy-driven accountabilities

At the Core

This article

- Addresses how to change an organization’s culture through policy and procedures
- Describes how to manage change through staff training and communications
- Provides a framework for records management program planning and implementation
will make it crystal clear who is responsible for each element of the records management business process.

**Procedures and Their Function in Records Culture**

The details of how to make the policy operational are typically contained in the records management procedures. Procedures explain how to implement the records management policy and define business process responsibilities, terminology, processes, and applicable database or technology usage.

Explicit, concise procedures are the primary reference tool for staff members who work with the records. The objective in crafting procedures is to eliminate the possibility of employees claiming that they don’t perform records management functions because the procedures are confusing or not accessible. Procedures should make it easy for custodians and other staff to perform their roles.

Records management procedures are likely to be followed if they streamline departmental business processes while meeting enterprise-wide records policy. They should be defined at a broad level to ensure compliance without hindering operations. At a minimum, the following components of the records management program should be documented by clear procedures in order to give custodians and other staff (e.g., those who create and retrieve records or information technologists) the guidelines required to meet records management policy requirements:

- **Management of active paper-based records**
  - Definition of the physical and intellectual control methods, who is responsible, etc.
- **Management of inactive, stored, paper-based records**
  - The standards for storage centers
  - The central inventory of stored records
  - How to assign disposition dates with reference to the retention schedules
- **Management of electronic documents**
  - How the retention schedules will be applied
  - Custodianship
- **Management of imaged documents**
  - Statement of applicable standards
  - How retention schedules will be applied
  - Custodianship
- **Management of vital records**
  - Who is responsible

- How the protection methods are implemented
- Records management and electronic document management technologies
- Lifecycle management, filing, and retrieval
- Handling non-records, transitory records, and official records

In short, procedures will help evolve the information management culture by providing employees with the detailed enterprise-wide guidelines to implement components of the policy.

**Training and Communications**

**Identifying Audiences**

Training and communications will be designed and directed toward segmented audience groups specific to each organization. All employees should be aware of a basic level of knowledge and understanding – even if a small group is exempt from playing an active role in maintaining and retrieving records. It would be highly unlikely for more than a few employees in a typical organization to claim that “records management policy does not apply to me.” For most organizations, records management policy will apply to the following groups:

- Senior managers
- Department managers
- Records custodians
- Frontline staff and knowledge workers (the majority of employees)
- Exempt group, those few staff who never create or refer to records

The names of the audience groups are derived from the roles that are outlined in the policy and procedures. Depending on the size of the organization, it may be possible, even necessary, to create a list of employees within each group or to use the identity management system within the human resources (HR) department to indicate which employees are members of each group.

**Senior managers:** This high-level group, which includes the president, vice-presidents, and executive directors, requires information about why the program is underway, what its benefits are, and, at a broad level, how the implementation will occur, so it can provide visible support for the records management program. Senior management support is often cited as the single most important factor for determin-
ing records management success.

Managers: The managers’ group, which includes directors and managers of departments and operational units, has destruction approval responsibility and accountability for records series and integrity as allocated in the classification and retention schedule. Perhaps most importantly, this group pushes the records retention stop button; that is, department managers halt destruction for specific case files should there be pending litigation, audit, management review, or other requirement. This group’s lack of awareness of or commitment to the program can create the largest obstacles to a program’s success, so training and communications are key for its members.

Exempt group: The exempt group comprises only those who have absolutely no role in records management. In theory at least, there are few employees in an organization who can rightfully claim that “records management does not affect my job” unless they are outside workers who never create or refer to records within the organization.

Figure 1: Training Seminar Duration for Records Management Content

<table>
<thead>
<tr>
<th>Group</th>
<th>Training Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Senior Managers</td>
<td>15-minute presentations throughout implementation and program maintenance</td>
</tr>
<tr>
<td>Department Managers</td>
<td>2-hour seminar</td>
</tr>
<tr>
<td>Records Custodians</td>
<td>8-hour seminar (two half days)</td>
</tr>
<tr>
<td>Frontline Staff and Knowledge Workers</td>
<td>1-hour seminar</td>
</tr>
</tbody>
</table>

Records custodians: This group comprises the members of the organizational staff who are responsible for maintaining physical control of paper-based records and intellectual control of paper-based and electronic records and for managing the phases of the records life cycle (e.g., annual purging, issuing destruction notices, and preparation of semi-active records) for records in all formats. It may take months – even years – to determine who the custodians are for new records management programs. Once identified, staff turnover often means custodian changes, so these changes must be tracked. It is important to ensure that the records custodian roles and tasks are written into their position descriptions, so the records manager should liaise with the HR department regarding custodial tasks.

Frontline staff and knowledge workers: All other employees constitute this group, which plays a lesser role in the physical maintenance of records but a significant role in creating and retrieving them within various departments. Knowledge workers are those employees whose primary focus involves collecting, processing, or analyzing information and data as opposed to physical goods.

Records that stem from frontline staff and knowledge workers (e.g., engineers, sales workers, claims officers, HR advisors, and accountants) without doubt have the greatest chance of not being managed according to organizational policy and procedures. This is because knowledge employees may not recognize official records as being distinct from transitory documents and may neglect submitting them to the designated repositories for filing.

In general, no corporate original records should reside in the workstation of an individual employee. But official records that are maintained in employees’ personal workstations, outside the corporate systems, are abundant. This issue can be addressed through training and communications.

Preparing Content for Change

Records management training and communications are perhaps the most significant part of evolving a records management culture. Content must be developed specific to each audience.

Senior managers: Training and communication messages for the senior management group will include the stated rationale for the records management program:

- Risk management
- Cost savings
- Records retention
- Space reduction
- Legislative compliance issues

Training for this group will mostly be in the form of presentations, program reports, statistical summaries, goals, and objectives. It is unlikely that senior managers would attend formal training seminars, as they have executive assistants who will file and retrieve records for them.

Managers: Content messages for the directors and department managers will include:

- Accountabilities for categories of records (with reference to the classification and retention schedules)
It is typical for middle managers to be completely unaware of the length of time it takes for custodians to perform records management duties accurately. For example, many managers would assume that it should take one hour – instead of one day – to purge, index, and create file folder descriptions on a database for a single three-foot file drawer consisting of 60 to 75 folders. This perception, if extended to other records management tasks, means that many departments likely have only one-seventh the resources needed for those tasks. Without sufficient time to undertake routine filing duties, the reliability and usability of records can be destroyed. Therefore, in training seminars and communications to middle managers, the records manager needs to provide accurate implementation and maintenance times and estimates.

It is also critical for managers to understand the importance for all employees to contribute to the success of the records management program. Those who are not fulfilling their responsibilities for records management business processes create weak links in the chain. Unfortunately, if frontline and knowledge workers neglect to submit records for filing, records custodians cannot make them available when needed.

**Records custodians:** Records custodians will require training in records maintenance procedures, including the following:

- Processing active and semi-active records
- Indexing (electronic and paper active records at the case-file level and for stored boxes)
- Purging records for storage and destruction
- Using technology
- Completing destruction forms and processes

**Frontline staff and knowledge workers:** Most employees fall into the frontline staff and knowledge workers category and will share in the records generating and referencing roles. All employees need to know what a record is and is not, how to use the records management technologies for retrieval, and where and how to send and retrieve records for reference.

Once the content messages are confirmed for each employee group, training for each group and communication vehicles can be developed. An overall training and communications plan is required and should be refreshed annually.
**Designing the Training**

Records management training consists of knowledge, attitudes, and skills transfer. The objective in teaching adults is to transmit information. Records management must design workshop time so that participants reach their own conclusions and levels of learning.

Knowledge is often best taught through mini-lectures. The training seminar requires a booklet or presentation to accurately train staff on relevant records management knowledge. For example, the rationale for the records management program can be delivered in a mini-lecture that takes about five minutes. The lecture will explain how statutes, standards, and law are the drivers of the records management program.

The information management culture is influenced by personal and corporate attitudes. Attitudes that promote best practices in records management are best addressed in training seminars through one-on-one or small group discussion. For instance, that records are a corporate asset and not employee property is an important attitude to condition. In a training seminar, the instructor can design a small group discussion around corporate records stored on home computers. This discussion would allow employees to “self-learn” and think about their own practices to determine which are acceptable and which are not. At the end of the discussion, the instructor can clarify the attitude. Participants in such discussions will realize which of their existing attitudes work with the new policies and which do not.

Finally, the records management training addresses skills that are best taught through in-class practice exercises. Examples of skill-based exercises are practice in:

- Classifying sample documents
- Entering records into a database
- Determining retention periods for sample records
- Distinguishing records from non-records and transitory records

Successful training seminars will be lively and interesting when there is a blend of mini-lectures, discussion, and practical skill exercises.

The length of training seminars may be dictated by the time available. At the same time, there are reasonable, minimum time-frames needed in order to teach the core content. (See Figure 1 on page 45.)

**Developing the Communications Plan**

A communications plan will identify the activities and vehicles needed to create and deliver information on the records management program to all audience segments at the appropriate time. Ideally, the records manager will create the communications plan with input from a specialist such as a staff member in employee or public relations. Creating the plan begins with gaining an understanding of the current records management culture and what the desired culture will be. The next step is to determine the appropriate communication vehicles tailored to the previously defined audience groups and the specific messages they need. The choices for communication vehicles are:

- Printed brochure(s)
- Website and/or intranet
- Electronic announcements
- Newsletters
- Manuals
- Printed materials (e.g., procedures, records schedule)

Investing time in communications planning allows accurate, effective delivery of messages tailored to the audience groups. Evaluating the outcome of communication vehicles is recommended to allow the communications to be refined to better meet user needs.

**The Implementation Plan**

A change in records practices will affect virtually each employee and department. While this evolution is being planned, changes may be viewed as unexpected (and unwanted) by the organization’s staff. The implementation plan will address training and communication to minimize surprise by ensuring that the procedural and technology changes are communicated in advance and that training seminars are scheduled. The plan itself will create an understanding of why the changes are necessary. Elements of the plan are:

- Rationale for the records management program
- Activities to implement the program
- Assessment of the organization’s ability and cultural values related to acceptance of change
- Researching, documenting, and mitigating the risks and barriers to success of the proposed changes
- Providing sufficient levels of information and communications on the proposed changes
- Development and delivery of training

The primary obstacle to employees taking part is a lack of awareness about the change, and this obstacle can be eliminated by communication.
• Production of a Gantt chart for the project, change management, and training activities
• Timing, budget, and resources needed to implement the change management activities

Implementation Success
The primary determinant of any project’s success is active and visible sponsorship from supervisors and management throughout the project. Employees need to hear the message about change directly from the chief executives and also from their direct supervisors. The records manager can work to ensure that visible messages are sent from the chief executive as well as from supervisors to employees affected by the records management program. The primary obstacle to employees taking part is a lack of awareness about the change, and this obstacle can be eliminated by communication.

Another significant obstacle to change is employee resistance at all levels: frontline, middle management, and senior management. It may be inevitable that some proportion of employees simply will not buy into the proposed change, even at the senior-management level. Given this possibility, it is more worthwhile at the outset of the program to focus on bringing the majority of employees and departments into the new systems, technologies, and processes rather than investing time and energy attempting to convince naysayers. At a later stage, the focus can turn to slow adopters. Over time, the number of resisters and the volume of negativity around the change will likely diminish.

During and after implementation, analysis of how the change is proceeding will allow records managers to address any obstacles. Figure 2 on page 46 may be used to identify and fix any obstacles.

Evolving the records management culture through a multifaceted change process that incorporates policy and procedure development, communications, and training as significant elements that will achieve successful records management program results. 

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References
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