THE DEVELOPMENT OF A RETENTION AND DISPOSITION SCHEDULE IN A PRIVATE ENTERPRISE

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ABSTRACT

Being a private international enterprise, the ongoing transition from paper to digitally stored documents and records has created some new challenges.

By implementing an Electronic Records Management (ERM) system, the tool for conducting records management is in place, but in order to utilise the possibilities, a revision of the retention and disposition schedule was necessary.

The task of developing a new schedule is time-consuming, but it will be an important tool for future RM work. It gives a good overview of the content of the archives. When implemented it will reduce growth, improve sharing of information and ensure compliance over time. It is also a vital tool for long term planning, in knowing what to keep and for how long, strategies can be developed based on timeframe, cost, need for access and volume. It can also be used in discussions towards historical institutions for the transferee of some or all historic records.

This paper describes the tasks involved in the process towards a new schedule.

1. INTRODUCTION

Det Norske Veritas (DNV) is an independent foundation with the purpose of safeguarding life, property, and the environment. Its history goes back to 1864, when the foundation was established in Norway to inspect and evaluate the technical condition of Norwegian merchant vessels. With 5574 vessels and 230 mobile offshore units in class, DNV is the world's fourth largest class society based on tonnage. In addition to classification, DNV also do certification and consulting services. DNV is located with 399 offices in 100 countries.

As a company, DNV have a 150 year long tradition of keeping information on paper, and along with that experience with evaluating what to keep and what to discard when the information is no longer of any value to the company. Parts of this task have been distributed to the end-user; the true expert knowing the content and the business value of it. In the transition to digital storage and preservation, new challenges have been raised. Since the volume is not physically visible – the end users have not see the same need for disposal of outdated, superfluous and redundant information.

New tools have opened for new ways of working with information in the creating phase as well as new ways of sharing and retrieving information. New techniques have also resulted in new problems in relation to long term preservation. A revision of the retention and disposition plan was needed, based on requirements, routines and the possibilities in a new ERM system. The old plan did not open for different disposition for material on the same entity, e.g. all records related to a project had the same disposition time. The ERM system opened for disposition on document level, enabling a more granular schedule.

2. NEW CHALLENGES

For most countries, the creation and preservation of archives are divided tasks, with a national archive responsible for the preservation and different governmental bodies answering for the creation, where the national archive often is responsible for guiding the creator. [1]

In the transition from paper to digitally stored information, the two tasks of creating and preserving have been merged into one for private enterprises, as part of a document/record life cycle. The ability to access digitally stored information in 40 years or 400 years, meets the same challenges, thereby needing the same strategy for long term storage in addition to plans for what to store.

DNV end user's focus on managing information has also changed. Since digitally stored volumes are not visible in the same way as paper, disposal of this information has not been executed, contributing to a growth rate of 100% every 18 months. In addition, users growing up with the internet and Google, have an expectation of fast and easy access to information.

An even faster growth rate, poor quality management of the content and a new search possibility demanded a full review of the way DNV handles its documents and records.

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[1]   http://www.lovdata.no/all/tl-19921204-126-002.html#6 Lov om arkiv, § 7. Rettleiings- og tilsynsansvar.

What needs to be preserved, why does it need to be preserved, and what can be discarded? In order to answer these questions, a thorough revision of the retention and disposition plan, including supporting tasks, was initiated.

3. RECORDS MANAGEMENT (RM) GOVERNING LEGISLATION

Private enterprises, at least in Norway, are not governed by local legislation in the same way as public sector.

In the process of revising the retention and disposition plan, few or no national laws governing the creation, retention and disposition of records have been identified, except from financial and human resources related documentation. The general legislation that governs governmental records in Norway focuses on documenting the decisions that have been made and was not transferable to private use.

Not being able to reuse the national legislations and routines, a method for creating a schedule covering the new identified needs was essential.

Standards as ISO 15489 and MoReq2 where investigated.

ISO 15489 states that "Records systems should be capable of facilitation and implementing decisions on the retention or disposition of records"[1] but gives little or no guidance to the content of such a schedule.

MoReq2 identifies the requirements to the REM system[2], but again, no help on forming the schedule itself.

In addition, the National Archive of Norway and the vendor Open Text where contacted, but could offer little assistance.

3.1. Models

In the preliminary work with the schedules, identified internal stakeholders where interviewed. These interviewees were managers and senior/expert users, and had no background in information or records management. Quite a lot of time was spent on RM theory, and a lot of misapprehension arose. In order to avoid this and to visualise RM, the concepts where transferred into simplified models.

3.2. Records Management

The first model is based on ISO 15489, and explains very simplified the difference between a document and a record.

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[1] ISO 15489, part 1:General, 8.3.7" Retention and disposition"

[2] MoRec2 Specifications, Version 1.04, Chapter 5 "Retention and disposition"
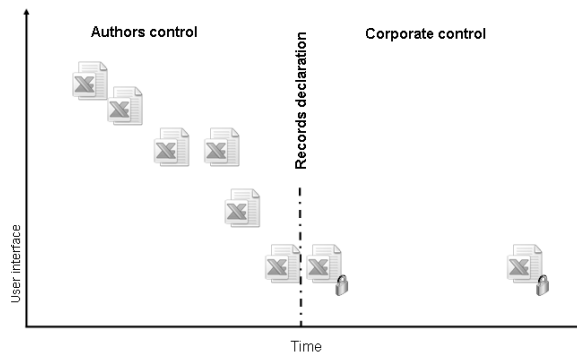
Figure 1. Document vs. records management; the characteristic of a document is that it is under author control where changes to the content, structure and metadata can be made freely within the boundaries of the document management system. When a document has been declared as a record, the control is transferred to the corporation, and the content, context, structure and RM metadata are "frozen".

This model has become the DNV model for Records management and is used in discussions in order to ensure that all participants have the same starting point.

In addition to this main model, 4 sub models where introduced in order to visualise the 4 different lifecycle alternatives that the main model may represent. They also illustrate the difference between declaration time and disposition time trigger.
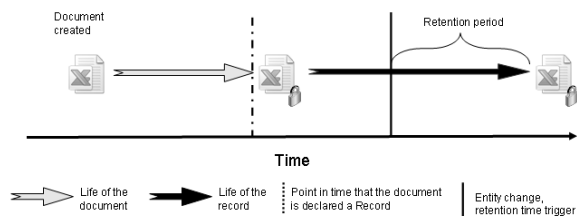

Figure 2. The documents are produced through the production system, and the end user has to manually declare it as a record. This is possible where the end user knows or controls when the document reaches the stage of readiness for declaration, e.g. a final report version.
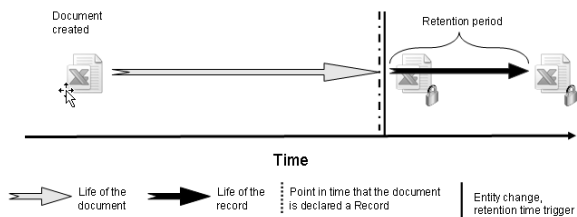

Figure 3. The document is declared a record based on an entity change in the system, e.g. the changing of a status from

"project active" to "project closed". This is relevant for e.g. project check lists, a document that is being updated during the project, but needs to be declared a record when the project is finished.
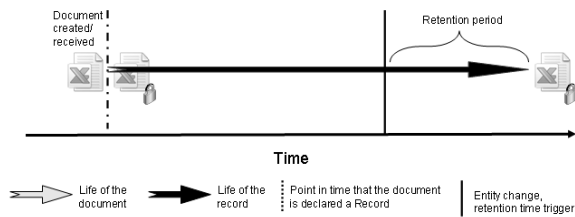

Figure 4. Shows a document that will become a record immediately when received by DNV, e.g. an e-mail from a customer. Record declaration is made when the document is imported into the production/ERM system. It is vital that it is not possible to tamper with the e-mail in the transmission process from the mail system to the production/ERM system to ensure the records authenticity.
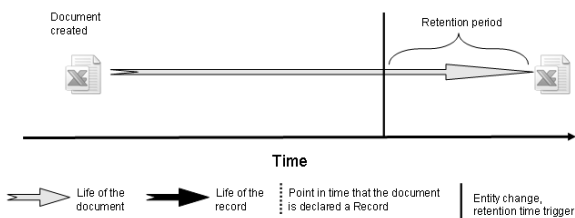

Figure 5. The document is never to be declared a record, and stays in the system as a document.

In combination with these 4 lifecycle scenarios there are different disposition possibilities. The different possibilities that will be implemented in DNV are:

- Automatic disposition of both document/record and metadata stubs

- Automatic disposition of document/record keeping metadata stubs

- Documents/records up for deletion are sent for review

The revision might be performed on document level or for entire entities, e.g. all documents/records belonging to one project.

In addition, some records and documents will for historic purposes be kept permanently.

4.   THE PROCESS

First task was to identify "why do private enterprises keep records?"

For private companies, funding of archives has to be justified. Keeping records is an expense. Even for a foundation like DNV, justification has to be identified and accepted in order to receive funding of the archives.

In DNV three reasons for preservation of records have been established:
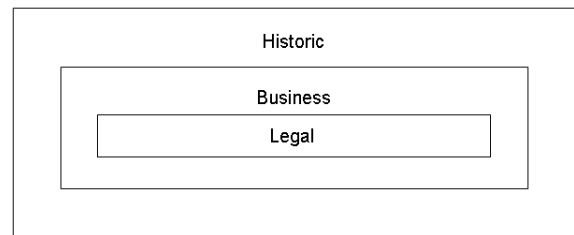

Figure 6. DNVs model for keeping records.

The core represents records that need to be kept in order to fulfil legal requirements for businesses. This is mostly records related to HR and accounting/finance. (The challenge here is how to be compliant in 100 countries. The retention time varies from 0 to 70 years, with some that we are prohibited to keep for longer.)

The next level is records that are kept for business reasons, e.g. information considered vital for re-use or proof of conduct, because the records information content is allowing the business to run more effectively and efficiently or simply because our customers expect it, in some cases through formal agreements.

The last reason to keep records is for historic purposes. These are records kept in order to document historic events, products or processes. In DNV these records are predefined and approved by our CEO. Documents belonging to this category are typically recurring records as annual reports, development plans and minutes of meetings from board meetings. This category also includes records from major incidents like the Alexander Kielland accident in the North Sea[1], or the records concerning the royal yacht "Norge". Incident records are approved continuously by the owner of DNVs historic archive.

Documents that do not fit into any of these 3 categories, are considered unsuitable as records, and should therefore remain as documents and be disposed of according to the disposition rules for documents.

As part of the work on records, a retention and disposition schedule for documents were also developed in order to automatically discard superfluous information and to avoid a situation where documents are 'kept forever' while records were managed and disposed of.

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[1] Alexander Kielland was an oil production platform that sank in 1980.

4.1. Document types

After identifying and establishing the rules for which records to preserve, the mapping of the different types of documents existing in DNV were initiated. At present 44 different document types (doc.type) are identified.

All record types have a corresponding document type, but not all document types become records types.

In this process, 27 different synonyms to the type "Agreement" were discovered only in English. The task of translating this into local language has not started, but through implementing doc.types users have the possibility to search for "Agreement" and get hits in local language.

4.2. Process analyse

In order to really understand which documents where produced in DNV, and which needed to be declared as records, a thorough analysis of our production systems were initiated. This is still work in progress, but 3 of 4 major systems have been completed, analysing each step of the processes, what is input and output. At present, SharePoint 2010 is under implementation, and part of the implementation project is to do a similar analysis.

4.3. Retention and disposition schedule

After having established the criteria for which documents that are to become a record, the definition of document types and the process analysis, the concrete work on the retention and disposition schedule could commence.

In order to take full advantage of the ERM system and identify roles that could be governed over time, the schedule ended up with 14 different entities for each rule.

1. Process: DNV core business processes and support processes where records are produced or received.

2. Record owner/responsible: All records and record series shall have an identified owner. The owner can delegate the job to an identified role in DNV.

3. Record identifier: A record may be identified by its correlation to other records or by its content.

4. Record series: A group of identical or related records that are normally used and filed as a unit, and that permit evaluation as a unit for retention scheduling purposes.

5. Document type: The content of the record - what the record is about.

6. Retention purpose: Records retention classified as;

    i. LE- Legal

    ii. BU – Business

    iii. HI – Historic

7. Warrant: Exact reference, including version/edition, to regulatory document (law, rule, regulation, governing document) in which the retention or disposition requirement is stated.

8. Retention period: The period of time the record must be kept before it can be destroyed.

If the record is to be kept forever, this is to be indicated by using the term "Permanent" instead of stating the number of years.

9. Retention trigger: The trigger for when the retention period starts running.

10. Disposition rules: Rules of disposition action.

11. Storage media: The medium in which the record is kept and managed.

12. Storage facility: The name of the application and / or the physical archive in which the records are stored during the retention period, e.g. Livelink, DNV Historic archive.

13. Outsourcing of the storage facility may occur, but only after an analysis of the rules governing the records. For HR related records, legal counsel must be obtained prior to outsourcing if records are to be stored in another country than the country where the record originated.

14. Security classification: Identification of the level of protection required for the content type.

5. IMPLEMENTATION

Up till 2008 DNV had 4 major production systems with document management functionality, but with no or poor records management functionality. These systems acted as digital information silos, with no exchange of information between the systems. A growing focus on sharing and reuse of information resulted in a major merge project, where files from the different systems where moved into one common repository; Open Text's LiveLink (LL).
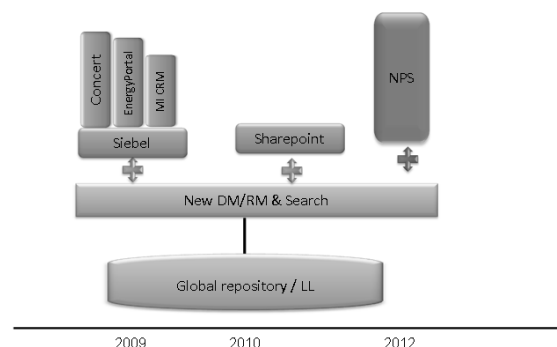
Figure 7: The Conceptual design of the merge project.

With its records management functionality, it has enabled DNV to implement the retention and disposition rules. A "declare records" functionality has also been implemented in the production systems. This combination ensures that DNV's records and documents are managed in a satisfactory manner.

There is no local records management role in DNV, requiring the system to do as much as possible back office in order not to impose too many new tasks on the end user. One of the back office functionalities implemented is a link between templates and doc.type. In addition all the retention and disposition rules are applied to each document and record on creation.

So far 3 of 4 systems with a common document repository of a total of 4.000.000 files/1255 GB have been merged. Plans are to move the last system in 2012, currently consisting of 8.417.984 files/2750 GB.

6. LESSONS LEARNED

For the end user, the merge of the file repository has together with the implementation of a common search functionality resulted in easier access to the information in DNV. In addition, corporate naming conventions e.g. doc.type have increased the quality of retrieval and enabled search across languages. The manual declaration function is a functionality the end user has been requesting.

A clearer definition of ownership and systematic work towards external legislation has resulted in better governance and compliance with internal and external rules and legislations.

Through the work and the use of simplified models, the general records management maturity in DNV has risen.

The retention and disposition schedule gives an easy overview of how long a document or record needs to be kept and allows for more systematic work towards the objects that needs to be kept for more that 10-15 years. LiveLink supports both migration to a preservation format and differentiated storage media, and strategy work on this topic is currently ongoing.

Generally, the quality of our repository will become better through the declaration functionality and the automatic disposition of documents and records.

7. CONCLUSION

In the transition from paper to digitally stored information, new rules for retention and disposition must be developed in order to utilise the possibilities in the ERM system.

The regulatory landscape international enterprises exist in, arises challenges for the handling of documents and records. Changes in national laws as well as contradictory rules and regulations between countries that the company is represented in and no common "world overview" of which laws that applies, highlight the importance of thorough work towards a common retention and disposition schedule.

It is crucial that enterprises have enough resources and insight to make the right decisions at the time of record declaration and thereby ensuring the correct management and trustworthiness of records through their lifecycle.

Not all private enterprises have the funding to preserve records for historic purposes. In order to preserve the memory of private enterprises, national archive institutions must show initiative in order to preserve this part of history.

There is a need for usage of internationally accepted standards and auditing regimes in private enterprises in order to address and act within the difficult international regulatory area of preserving records.