

Association of Corporate Counsel Records Management Program Maturity Model



Maturity Model Overview

The ACC Records Management Program Maturity model provides a detailed maturity model for all aspects of an organization's records program. It seeks to gauge program effectiveness across a variety of program elements, taking a "big picture" view to increase program value.

Records Management Program Objectives

A records management program is a combination of policies, processes, technology implementation, training, monitoring and auditing to identify, classify, manage, and dispose of electronic, paper documents, and non-paper physical records (such as drug samples or drilling cores). This Maturity Model seeks to identify various aspects of records management maturity based on the value they bring to the organization. For the purposes of this Model, the value is defined as follows:

Ensure Compliance -- All organizations face a multitude of legal and regulatory recordkeeping requirements. Additionally, organizations face privacy, data protection, information security, and anti-corruption requirements. An effective records management program ensures recordkeeping compliance and promotes other compliance capabilities.

Reduce Risks -- An effective records management program reduces risks in litigation, information security, breaches, and other types of information-related risks.

Lower Costs -- Well-designed and executed records programs lower both ongoing and one-time costs in a variety of areas, including eDiscovery, data storage, records storage, and regulatory fines.

Increase Productivity -- Records programs increase productivity of individual employees, and enable better collaboration and information sharing with and across departments.

Under this Model, the higher the maturity in any given area, the greater the value the program brings.

Background information on the concepts outlined in this Model is available:

ACC InfoPAK: Creating a Modern, Compliant and Easier-to-execute Records Retention Schedule

ACC InfoPAK: Executing Your Records Retention Schedule

These InfoPAKs are available on the ACC Website or upon request at info@contoural.com.

Model Notes

Not all aspects of this model will apply to every organization, e.g., global program capabilities for companies with operations in a single country. Furthermore, the importance of any given capability is likely to vary from organization to organization, based on the importance and weighting of various maturity aspects. Also note that this model focuses on the impact of a records program. It does not address the best strategy for achieving a particular result, as this varies from organization to organization. Likewise, it is a model for records management programs, and does not address all aspects of more comprehensive Information Governance programs

Note that model elements designated with a "+" are cumulative with the previous maturity level.

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Maturity Model Criteria	Level 1 -- Immature	Level 2 -- Limited	Level 3 -- Essential	Level 4 -- Proactive	Level 5 -- Advanced
Policy and Schedule					
Records Retention Policy	No records policy	Policy only addresses retention	Policy addresses both retention as well as disposition processes	Policy is consistent with other policies such as legal hold policy, and includes roles and responsibilities for administering the program	+Policy is up-to-date, comprehensive and fully integrated with all other compliance regimes
Records Schedule Legal and Regulatory Recordkeeping Compliance	No records retention schedule or schedule is not based on any legal or regulatory requirements	Addresses general legal and regulatory retention requirements; Deletion not supported in policy	Addresses both general and industry-specific legal and regulatory retention and disposition requirements	+Variable or event-based retention requirements	+Addresses records and explicit non-records in a prescriptive manner
Records Schedule Comprehensiveness	Solely uses industry-specific guidelines based on information typical for this type of company	Information inventory created mainly from a list of what other companies in same industry have	Inventory developed based on interactively engaging employees, including newer document and record types	+Wide-reaching inventory across many roles and business units	+Full inventory of all information types based on open question review of what employees actually have, assuring all record content is captured
International (for Organizations with Global Operations)	Does not address any global requirements outside a single country	Separates requirements for a single country vs rest of world	+Addresses country-specific record requirements	+Addresses all country requirements grouping like country requirements together	+Compliant with all country requirements grouping like country requirements together and detailing country-specific exceptions
Records Schedule Inclusive of Records in All Media	Policy addresses only paper records	Addresses paper and email as its own record class	Addresses information and records agnostic of the medium upon which a record exists	+Records types determined based on a thorough review of all content, regardless of media	+Addresses all information types on all media across all types of traditional and emerging media
Policy and Schedule Clarity	Policy and/or Schedule fail to define Records or list examples of record types	Policy and/or Schedule fail to define Non-Records; Schedule includes confusing acronyms (e.g., ACT and CY)	Schedule explicitly defines Records/Non-Records	+Schedule includes specific examples of Non-Records that should not be retained	+Schedule clearly defines triggers for event-based records
Policy and Schedule Represents Consensus	Policy and schedule are used to justify disposition against practices of business units (who ignore the Schedule and save nearly everything forever)	Schedule identifies records to be saved, but Policy does little to build a consensus on disposition	Schedule identifies records and also serves as agreement across key stakeholders on what to save and not save	+Business units are in agreement with both the Policy and the Schedule	+Stakeholders, business units and employees agree that the Schedule represents the appropriate retention and destruction of company information
Schedule Is Easy to Follow	Policy is confusing (i.e., hard to understand) and Schedule is poorly organized, with hard-to-follow and abstract record definitions	Schedule not organized by business function, may be overly detailed	Schedule contains clear record definitions and includes examples	+Schedule organized by function balancing "small bucket" prescription with "large bucket" ease of use	+Useful and intuitive for employees providing quick access to classifying records

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Records Management Processes and Procedures					
Process and Procedure Foundation	Decisions on Records Management left up to individual departments or employees	Initial processes established for certain data formats/repositories, but not consistent across the organization	Procedures are well-defined and published	Well-defined and published procedures reviewed and updated on a regular basis	Continuous monitoring for compliance

Unstructured Data Records Management					
Unstructured Data Records Classification	Records contained in electronic files and other unstructured content are not managed	Repositories containing records in unstructured format are identified, but not individual records within repositories	Groups of unstructured records identified and classified as records	Individual records in unstructured format are classified per corporate taxonomy	Unstructured records with variable or event-based retention periods are classified as such
Unstructured Data Records Management	Individual employees manage files and other types of unstructured data in an ad hoc manner across File Shares, SharePoint and local storage media	Network file shares and collaboration sites are created and managed by individual departments or employees or records reside in content management or archive systems, but these repositories are not configured for retention	Governance processes and file plans specify data placement in central repositories based on content needs, and repositories are configured to support policies	+Retention is automatically managed per schedule and file plans	+Unstructured records with variable or event-based retention periods are integrated with external trigger mechanisms
Unstructured Data Records Disposition	Most unstructured information is retained indefinitely with ad hoc deletion	Ad hoc department clean up and review	Legacy non-record information and redundant, obsolete and trivial documents are identified as disposition targets	+Disposition managed per file plans and governance settings	+Data is moved and deleted according to the Schedule, with centralized auditing features in place

Semi-structured Data Records Management					
Semi-structured Data Records Classification (Email, Yammer, Wikkis)	Emails and other semi-structured content are not classified	Email servers and other repositories containing records in unstructured format are identified; Individual records within repositories are not identified	Groups of email or specific users' email and other records in semi-structured media are classified	Individual emails or other unstructured media are classified	Email and other unstructured records with variable or event-based retention are classified as such
Semi-structured Data Records Management	Employees use own discretion to manage data; Redundant PST files proliferate	General retention guidelines are established for records in email; Designated repositories made available	File plans are designed to put records in defined archive locations or content repositories	Emails are managed based on content and filing in preferred locations is supported with tools and training	Automation or technology assists apply retention policies based on metadata and content
Semi-structured Data Records Disposition	Most email retained indefinitely with ad hoc deletion	Limited disposition based on email guidelines	Big-bucket retention settings implemented; PSTs disabled and deleted	Routine disposition of email	Automated disposition tied to retention requirements

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Structured Data Records Management					
Structured Records Classification	Records contained in databases are not classified	Some database systems containing specific record classes are identified	Databases containing sensitive information (such as PII, PHI, financial information, and trade secrets) are identified and classified	Complete inventory of all systems and data flows documented	All current structured data is reviewed and classified, and processes are in place for new systems
Structured Records Management	All information is kept indefinitely, or in an ad hoc way by individual system owners or users	Record information is identified enterprise-wide and mapped to current repositories; Records Management impacts of changes are identified	Plans are designed to put records in specific repositories based on content and process needs; Change controls are based on risk	Retention capability is implemented for records repositories; Disposition begins for non-records; Change controls are applied consistently	Retention is defined, monitored and enforced across all repositories for both record and non-record information over full life cycle
Structured Records Disposition	Structured information is retained indefinitely	Limited ad hoc disposition usually due to storage constraints	Potential redundant, obsolete and trivial data is identified and reviewed	Disposition begins for non-records	Ongoing, standard process for disposition of records and non-record information

External Social Media or Messaging Platforms					
Social Media, Text Messaging or other External Platforms	Not in policy or processes recognition that platforms may transmit and store records or non-records information	Policies recognize some messages may be records, but no processes to classify or capture these messages	Social media and other messages that are records are identified and saved offline	Policies, processes and training in place to identify, classify, capture and manage messages that are records	Active program in place to proactively monitor social media and other messages to capture relevant records or other information and manage appropriately Company-wide training programs in place

Paper Records Management					
Paper Records Classification	Paper records maintained by employees and functional areas using their own filing systems	Paper records sent offsite have limited metadata and decentralized inventory information	Boxes sent offsite are required to have destruction dates	All legacy box inventory has been identified and classified	Onsite and Offsite records are classified, and information is routinely reviewed
Paper Records Management	Ad hoc/departmental management of paper records for both onsite and offsite storage	Paper management resides in a service organization (such as Facilities) and is not integrated with Records Management policies	Paper management function is integrated with Records Management and its policies; Decentralized inventory information	Paper records management and inventories from all locations are managed consistently across the company	Offsite vendor contracts are consolidated/managed centrally; Inventory is routinely reviewed
Paper Records Disposition	Ad hoc disposition of onsite and offsite paper records	Limited disposition of offsite paper records	Limited disposition of offsite paper records; Annual File Clean Up Days established for local paper	Offsite boxes are routinely destroyed and integrated with the Legal Hold process	Detailed disposition processes exist and are audited/updated regularly

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Non-Paper Physical Records Management					
Physical Records Classification (non-paper and non-electronic records)	The program does not recognize non-paper or non-electronic records	Some physical records are identified	The program recognizes physical records	+Physical records are classified, and retention is applied	+All types of physical records are classified, and full metadata is captured with each record
Physical Records Management	No physical records are managed	Some physical records are saved in various locations	Physical records are saved in accessible locations	+Physical records are easily retrievable	+Physical records are managed with full metadata captured
Physical Records Disposition	No retention of disposition is applied to physical records	Physical records are periodically disposed but not necessarily in accordance with a Schedule	Physical records are disposed in accordance with a Schedule on a periodic basis	+Physical records are managed and disposed of on a regular (usually yearly) basis	+Physical records are disposed of according to a schedule on a regular (usually monthly) basis

Records Management Program Integration with Other Compliance Programs and Processes					
Records Program Integrated with Privacy	Records Management is not integrated with information privacy policies or processes	Privacy only addressed in Records Policy but not the Schedule	+Privacy data inventory cross-referenced with the Schedule	+Records and privacy classification occur as a single process	+Privacy "right to be forgotten" and erasure requests fully integrated and automated with records requirement
Records Program Integrated with Information Security	Records Management is not integrated with information security policies or processes	Records are managed in systems that may or may not have appropriate security controls	Information security classification applied to repositories that contain records	+Records and information security classification occur as a single process	+Security fully integrated and automated with records requirement
Records Program Integrated with IP Management	Records Management is not integrated with intellectual property management	Records that contain intellectual property are identified but not necessarily properly managed	Records program incorporates intellectual property as part of record classification	+Records and intellectual property classification occur as a single process	+Intellectual Property captured, classified and maintained as core part of records program
Records Program Integrated with Discovery Processes	Records Management is not integrated with discovery processes	+ All records disposition processes suspended if there are any legal holds in place	+Automated records destruction processes fully suspended for groups of records under legal hold	+Automated records destruction processes fully suspended for individual records under legal hold	+Release of legal holds automatically invokes resumption of records retention and expiration of records previously held
Records Program Integrated with Mergers, Acquisitions and Divestiture Processes	Records Management is not a consideration in M&A or divestiture	Records management addressed in M&A and divestiture after the event has been completed	Records management is addressed proactively, including integration or separation of records and other information assets	+Records management is addressed pre-event to assess both risks and post- event execution plan	+Records management key component of integration or divestiture strategy, enabling increased information sharing across newly, integrated teams

Records Management Program Productivity and Collaboration					
Individual Employee Productivity	Employees maintain information in a variety of locations without direction	Limited guidance on storing information on file shares, SharePoint, and other Cloud locations	Employees understand where to store working information and record content for easier and faster search and retrieval	+Recordkeeping processes enable version control and easier information access	+Recordkeeping processes enable employees advanced information searching and retrieval capabilities
Collaboration and Information Sharing	No organizational collaboration; Left up to individual employees and/or departments	Basic collaboration tools provided, but no governance or guidance on how to use	Standardized tools and policies exist to support collaboration across the organization	Collaboration tools are centrally managed and used for both internal and external sharing	Collaboration tools are monitored and managed to protect sensitive information

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Records Management Program Employee Training and Awareness					
Communications and Messaging	No or limited communication to employees and business units on records management policies, programs, and processes	No messaging developed around records program and limited communication	Overall program messaging developed and communicated widely throughout the organization	+Communications and messaging strategy customized for different groups within the organization, and across geographies	+Messaging strategy developed and executed targeting different levels of management
Employee Training Programs	No formal employee training; Employees learn "on the job"	Limited training available on an ad hoc basis	Communication and Training Plan and basic content available for building awareness and driving compliance	+Ongoing Communications and mandatory training with tracking and follow-up; Hybrid content for both in- person and learning management system delivery	+Mandatory training integrated with employee on- boarding process and annual refresh for all employees

Records Management Program Monitoring, Audit and Maintenance					
Program Monitoring and Audit	No audit for policy compliance	Simple employee acknowledgement of program compliance without further inspection	Records Management Program conducted through regular audit of multiple program components, including analysis of records repositories, review of deletion processes, and analysis of systems for redundant, obsolete or trivial data	+Records Management Program compliance and comprehensive ongoing monitoring across all functions	+Records Management Program audits integrated with Internal Audit
Program Remediation	Ad hoc remediation on specific issues/individuals	Policy acknowledgement tracked and can be escalated	Risks identified and communicated	Risks identified and remediation plans developed	Internal Audit findings communicated to key stakeholders for remediation plan
Program Maintenance and Refresh	Limited updates or updates only every four years or longer	Schedules are updated (possibly automatically) without being synchronized to update records processes or updated training programs	Policies and Schedule have regular updates every 12 to 18 months and all records processes and trainings are also updated concurrent with the Schedule update	+Updates in privacy, IP, or other Information Governance programs coordinated with any needed records program policy, Schedule, process or training updates	+Any new retention requirements that occur and must be enforced before regularly scheduled updates are identified and implemented
Change Control Process	No change control process applied to schedule or records processes	Changes to the schedule are managed in ad-hoc process	Audit results are feedback into a change control process that may flag required changes to the schedule	Regular audits are fed into formal change control process for schedule, including changes reflecting information business value	+Formal change management applied to schedule driven by audits from multiple compliance regimes