

What does it take to build a global, enterprise-wide RM program? It starts with equal parts planning, management support, and foresight.

# THE BUILDING BLOCKS OF A GLOBAL RECORDS MANAGEMENT PROGRAM

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Implementing records management (RM) in just one division of an organization is no easy task. Now multiply that across countries, jurisdictions, business practices, cultures, and languages and organizations have the making of an epic task. Increasingly, however, they are looking to implement such a program. In addition, organizations are facing intensifying legal, regulatory, and business pressures to ensure that records across the entire organization are secured, authentic, reliable, and usable.

Almost every major organization does business internationally and, by definition, must generate several types of records that need to be managed across multiple jurisdictions. In the event of litigation, courts are not going to give leeway and lower the threshold just because certain records were produced in a different country and were not managed properly. Therefore, organizations must establish relevant policies, controls, and guidelines to manage and retain all records, regardless of where they were created or reside.

The nature and scope of a global program necessitates a great deal of thought and planning. It may not be out of place to suggest that implementing a global RM program may be one of the most challenging compliance initiatives an organization can undertake. Not only does it have to contend with established and, therefore, hard-to-change local business practices, but it must also deal with organizational and individual resistance. Further compounding the problem are conflicting interpretations of local laws, disparate IT systems, varying levels of management support, and a



general lack of appreciation for good RM practices.

A few years ago, the words “global” and “records management” were usually not mentioned in the same sentence. But in today’s changing Web x.0-enabled world, information and records cross local, national, and continental boundaries. Organizations are forced to quickly adopt and adapt. While some organizations have taken admirable steps in establishing controls and processes, others are still struggling.

The unique thing about a global program is simply the immensity of the problem at hand. A typical mid-size global organization will have offices in at least 30 to 60 countries, thousands of employees, hundreds of dissimilar business and IT systems, and conflicting legal and regulatory requirements. RM has really picked up steam the past few years as organizations have begun to realize the serious risk posed to their financial well-being, business, and reputation if records are not being managed properly. In addition, obtaining access to relevant records in a timely and efficient manner has become critical to the operational effectiveness of all organizations.

Global RM is not for the faint-hearted; it requires solid determination and courage to see the program through. There are many challenges, which require patience and fortitude, on the road to implementing a global RM program.

### Program Governance

A strong governance structure is critical for a successful global RM program. The first step in establishing such a governance structure is to solicit and obtain buy-in from the corporate (headquarters) leadership and then from each of the organization’s key regional leaders. But this is easier said than done, as some senior-level managers may not want to spend additional monies or even attempt to understand the full benefits of the pro-



Figure 1: An Orchestration of Different Organizational Functions



Figure 2: Global Records Management Staffing Model

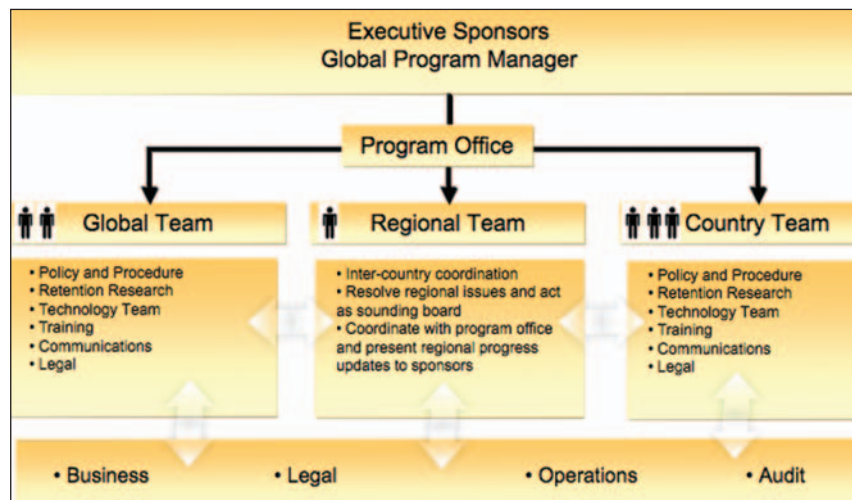


Figure 3: A Workstream-Based Program Structure

gram. It may require the RM team to get a chief-level executive officer or the board committee to further the interests of the program. Once executive support is established, the RM team can communicate with the regional lines of businesses and ensure there is alignment on the scope, objectives, roles, responsibilities, and timelines of the program.

A typical program governance model would include stakeholders from lines of business, legal, IT, compliance, audit, and operations with clearly defined roles, responsibilities, and deliverables. While it may not be practical to have representatives from every country the company operates in, it may be useful to have representation from the larger regions and/or lines of businesses. A key aspect of the governance structure is to have a centralized project management office that manages the different work streams and monitors and tracks the overall program.

Figure 1 highlights how the program governance can be modeled. In the center is the program office, which provides overall governance and monitors all deliverables across the program. Various key program activities and functions, such as program strategy, policy and procedures, and IT implementations, are managed across the various stakeholders, including business, legal, and operations.

### Program Staffing Model

A global RM staffing model requires the right mix and level of resources to enable maximum efficiency and effectiveness. A sample model staffing includes:

- Program sponsor (at least a senior vice president or even chief-level executive officer who reports to the board)
- Business sponsor, IT sponsor, general counsel, and other stakeholders working through a joint steering committee
- Global program manager (person

- responsible for executing global RM)
- Global project management office (coordinates planning, execution, and deliverables)
- Global-level RM team includes:
  - Policy and procedure development team
  - Retention research teams
  - Business team (representation from lines of businesses)
  - Technology architecture, design, and development team
  - Production support team
  - Training team
  - Communications team
- Regional-level RM team (coordinates regional activities, i.e., EU or Europe, Middle East, and Africa)
  - Regional RM coordinator
  - Regional lines of business representation (provide requirements, business process details, testing, user focus groups)
- Country-level RM team (implements RM locally)
  - Country records manager
  - Policy and procedure development team
  - Legal counsel/retention research team
  - Local lines of business representation
  - Systems implementation team
  - Local production support team
  - Local training coordinator
  - Local communications coordinator
  - Offsite storage staff
- Operations teams for operational

requirements, organizational change management, and operational processes and procedures

- Audit teams to audit and validate compliance

Figure 2 highlights a sample global staffing model that creates effective governance, communication, and collaboration.

### Program Structure

Structuring the implementation teams can be complex. One approach is to create enterprise-level workstreams to address aspects of the program, such as policy and procedure development, retention research, systems implementation, training, deployment, and support. Each workstream operates at the global/local level but is connected through touchpoints to the program office. Each workstream's responsibility is to ensure that regions complete their specific tasks and deliverables in ac-



# KEYS TO IMPLEMENTATION

- **Establish friends in high places in the regions.** This sounds like a cliché, but in reality it is the only way to get through and push the RM agenda. No amount of phone time across the pond will get the program where it needs to be.
- **Use an iterative implementation process.** Plan smaller chunks of work, focusing on the key regions and addressing critical RM issues first and then ramp up the work as appropriate.
- **Establish business-level sign offs at the regional level.** As requirements are developed and the design becomes ready, it is important to get the business to sign off on the deliverables so there is a clear delivery process.
- **The business users must review the system functionality, understand the process, and assess the planned user interface so there are not surprises later.**
- **The local IT and production support teams must be hooked into the implementation process so they can plan for the appropriate hardware, software, and post-production requirements.**
- **A key decision point will be reached when a user has to decide whether to pursue a corporate-level file plan and taxonomy metadata or use a more localized regional model.** Each option has pros and cons and will affect the standardization, search, RM controls, and reporting. Decisions should be made through a long-term lens.
- **Manage the scope of the requirements; otherwise, the program will be delayed even before it starts.** Ensure that only relevant RM requirements are being considered. Items such as business workflows and process management can be addressed later depending upon the availability of budget and time.
- **Communicate the implementation timeline to everyone across the company so each region knows its place in the overall implementation timeline.** While it is doubtful that regions will have a strong dependency, it is nevertheless worth assessing the global impact of any schedule slippage.
- **Develop common testing criteria.** This one is important. Even if regions are using different technology platforms, a common set of scripts and test cases can be leveraged to ensure consistency and conformance.
- **Track compliance with training and set targets by regions so all employees in the region are trained in managing their records.**
- **Develop a communication plan at the corporate and the regional level.** Use periodic messages from senior management to reinforce the importance of the program.
- **Establish a feedback loop between the corporate team and all regional users so there is an effective mechanism to communicate issues and challenges.**

cordance with the program timelines.

The touchpoints manage the workstream globally and resolve any cross-border issues. A good example of this is records retention research where almost every region will have distinct statutes and regulations that govern the retention requirements. As an example, the global retention workstream could work with each of the regional retention research touchpoints to complete the retention work and also ensure that a consistent approach to performing the retention work is being undertaken. This approach ensures a consistent methodology to performing the work.

Figure 3 on page 36 illustrates different workstreams that operate regionally but are monitored and controlled at the global program level.

## Program Execution

Following are three key areas in the program execution phase.

### Policies and Procedures

Developing a RM policy that meets all regional needs may not always be feasible. The program team should consider developing an enterprise-level corporate records management policy that can be tweaked by each of the regions depending upon their unique circumstances. Some regions may choose to apply the corporate policy as-is while others may change sections of it and localize it as appropriate. This approach provides a level of flexibility to the regions while reinforcing the corporate-level objectives.

### Systems Implementation

Systems implementation is perhaps the most challenging part of the global RM program. From deciding the technology platform to the architecture, design, coding standards, tools, and utilities to be used, open source or not, and how to deploy the system, each and every step requires deft handling. It is quite possible that each region has its own preference for technology platforms, and while there

are vendor packages that do a good job integrating disparate systems, it would be highly complex to attempt to tie all these systems together.

It is better to try to obtain consensus from the key regions and then proceed with the technology design. Once the technology platform is decided, two or three pilots need to be performed within the regions to ensure there are no surprises during implementation and deployment. The key to a successful distributed delivery approach is to ensure that all regional teams report into the same program workstream so challenges, show stoppers, and the inevitable turf wars can be resolved quickly.

### Training

Localize the delivery of the training, but standardize the content. Each region will have its unique way of providing training, but it will be helpful if there is a common theme. Working with the regional counterparts, the training workstream can develop common content that incorporate key objectives of the program. The regional teams can then build their specific training content around this common set of messages. On a periodic basis, the corporate and regional teams can get together to review and update the content as appropriate.

Implementing a successful global RM program requires a well-choreographed and well-coordinated execution, and takes time, energy, and money. Organizations are realizing the importance of a global program that ensures compliance with relevant laws and regulations and provides a competitive advantage to the business. The power to quickly and efficiently locate records is no longer a pipe dream. With the right level of planning, foresight, and management support, it can be a reality. **END**

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## KEYS TO IMPLEMENTATION *Continued*

- **Work with the regions to develop a regional compliance plan that addresses how and when each region will be fully compliant with the RM policy and fully utilize the automated system to manage records.**
- **Develop a common set of procedures around litigation hold and discovery.** This is a key component of the program and will ensure that regions understand the what, how, and when of search and discovery and are able to present them in the appropriate format requested.
- **Develop a metrics-based assessment to determine the health of regional records management implementations.** These could be based on audits, spot checks, and self-evaluation.
- **Periodically review and update the retention requirements for records and establish a process to incorporate updates.**
- **Implement a change-management process so system changes, defects, enhancements, and upgrades are performed in a well-defined process.**
- **Determine, with each of the regional leads, the approximate cost and contribution rate to sustain the implementation.** Budgeting and funding will always continue to be a challenge in a global RM implementation. Some regions may contribute more, some less, but still the program needs to go on at the same pace.
- **Apply a federated model where feasible.** While it may be quite complex to integrate disparate regional systems, it can be worthwhile to look at using web services to build the bridge between the records repository and key critical systems.
- **Track usage of the records repository on an enterprise level to ensure there is not a dip in the usage of the records repository.** Usually sustained low usage will point out system problems, performance issues, etc.
- **Conduct mock tests to validate that everyone understands and follows RM procedures.** An example could be to issue a global litigation hold to test the RM controls.
- **Work with each of the regions to develop common offsite storage processes including labeling, boxing, coding, and recalling.** While each region will have its own nuances, a consistent process will help alleviate the inordinate amounts of time spent looking for records in different regions.
- **Understand the cultural aspects of each region.** Work with regional leadership to develop region-specific RM processes while keeping the overall model consistent globally.
- **Choose a technology vendor that has a global reach, can overlap with many of the company's offices, and can provide localized support.**
- **Above all, build, develop, and maintain the relationships with each of the regions.** There is nothing that can smooth out the arduous task of a global implementation like the relationship and communication aspect of the program.