

**CGOC 2006 SUMMIT**

From Retention to Preservation: **Soup to Nuts**

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# Records Management

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# Biography

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## Harry Pugh

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Harry is currently the Managing Director of Reengineering for Operations and Technology at Citigroup where he leads the development and implementation of a number of corporate policies. Prior to this role, he was Chief of Staff at Citigroup Mortgages. His long, successful tenure at Citigroup also includes Director of Recoveries US Card Products and as Controller for Global Bank Cards. He holds a BA and a Masters degree from Harvard University.

# Foundation for Robust Records Management Program

- Establish Policy
- Establish Company wide Records Classification Codes
  - Include Record Types / Examples, Retention Periods
  - Allow for different retention period by country by business
- Establish Records Management Organization Structure
  - Every Records Management Officer
  - Every Records Management Unit
- Establish complete Inventory of all Record Management Units (RMU)
  - By Business, By Country down to the lowest level RMU
- Establish inventory of ALL Records Management Classification Codes and location of records for each Records Management Unit

# Foundation for Robust Records Management Program

- Roll out tools to make adherence to policy easier
  - Electronic Tools (may be centralized or decentralized)
  - FAQ's, Sample Process, Risk Assessment Documents
- Establish Records Management Communication Process
- Develop Robust Legal Hold Process
- Establish Records Management Training Program for ALL employees with more detailed training for Record Management Officers (RMO).
- Communicate, Communicate, Communicate

# Basics for Records Management Policy

- Objective, Scope, Target Audience, Owner, Effective / Transition Dates
- Define what are and what are not records
- Establish clear roles and responsibilities (not just in Record Management)
- Establish ownership of records from a records management perspective
  - Identify, Classify, Retain, Protect, Retrieve, Retire
- Require use of single, golden source for record retention periods to help the businesses to consistently identify and classify records
- Establish exception / deviation process
- Require documented procedures in the businesses / departments that address how they comply with policy
- Require a risk-based self assessment process for the businesses to use to measure “risk of non-compliance”
- Require use of common tool (when available) across all businesses
- Define common terms (glossary)
- Point to other “Helpful Documents” / FAQ’s / Process Guidelines

# Key Building Blocks

## Records Management Organization Structure

- Our structure is Business / Product and Geography Based
- Structure includes the names and contact information for all Record Management Coordinators, Officers, Administrators and others such as vendors who will have read access to various electronic record management tools.

**AND**

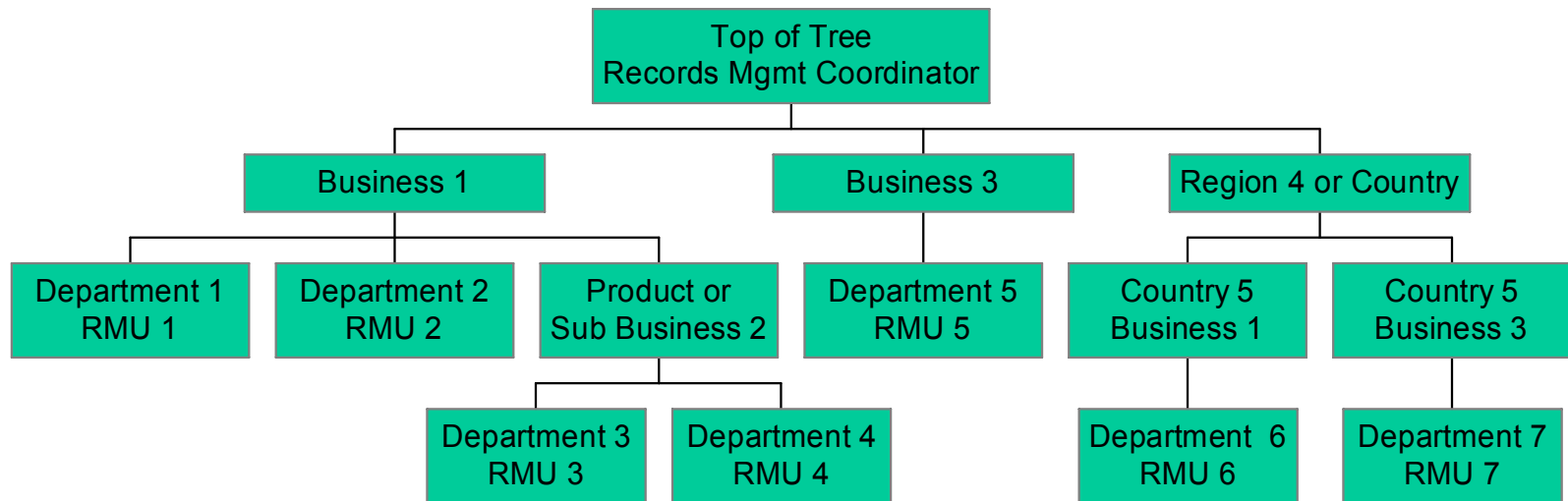
- Includes all Records Management Units where record retention responsibility is maintained

## Create then Update Master (U.S) and Local Classification Codes

- Our “Universal Records Catalog” (URC) is the only official, auditable source for record classification descriptions, record types, and retention periods by country by business
- Ensure strong change control with proper legal approval process for any retention period changes

# Key Building Blocks

Sample Complex Organization



Each Business, Region or Country has a Records Management Coordinator or a Records Management Officer at the top. Each Records Management Unit has a Records Management Officer Responsible for Records Keeping at that unit

# Key Building Blocks

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## Inventory of Records

- Step 1) Establish manual list of all record classification codes and where they are maintained
- Step 2) Provide centralized tool to maintain classification codes and location

## Results

- The required organization structure coupled with properly approved local classification codes will allow a significantly more robust legal / litigation hold process

# Deal with Global Issues

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- Older applications that are not records management compliant
- New and retiring applications that contain records
- Electronic Records
- Email
- “Legacy” Records
- Specific Business Situations

# Issues

## Electronic Records Disposal

- Start by requiring that “new” applications contain a “records management solution”
- Identify, Classify, Retain, Protect, Retrieve, Dispose based on Universal Records Catalog (URC)
- Require old applications have a “solution” in some rationale time frame
- Require retiring applications to have some sort of solution
  - Examples -- comma delimited dump, archive source code and data, etc

## E-mail Retention Practices

- Few emails are actually records; however, very difficult, without tremendous effort, to separate real records from “transient documents”
- Store on unalterable drives indexed by sender, receiver, date
- Develop methodology for disposal of old records

## “Legacy” Physical Records

- Old records that have been stored prior to company wide implementation of official Universal Records Catalog (URC)
  - Frequently little or no information is associated with stored cartons
  - Develop methodology with legal, compliance, company subject matter experts and vendors to match what information is available to the current URC
  - Agree on what to do when only information is insufficient to make a match. We combine age of carton with date carton last retrieved and small statistical sample of actual carton inspection
- Prove out method, then work with other vendors and other countries