RIM: It's Not Just About The Records

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https://www.icrm.org/about
Record Problems = Compliance Problems

Costco to Pay $12 Million Penalty for Poor Pharmacy Controls

Justice Department cites improperly filled prescriptions, poor record-keeping, and inadequate inventory monitoring.

Associated Press
Jan. 19, 2017 2:34 p.m. ET

Investigators: Interior’s poor record-keeping makes it impossible to tell if mass employee transfer was legal

Author: Dino Grandori, The Washington Post
Updated April 11 Published April 11

The ATF’s Record-Keeping Issues Extend to Its Confidential Informant Program

PG&E recommended for huge fine for poor record keeping
By Bob Egelko Updated 6:06 p.m. PDT, Wednesday, June 1, 2016

DON’T LET THIS HAPPEN TO YOU
Record Problems = Compliance Problems

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- Affect risk assessments and investigations
- Affect the organizations ability to respond promptly
- Affect the ability to self-report, correct
- Affect resulting enforcement action: strategy/cost

Existing RIM Program

- If you haven’t already done so partner with the RIM team
- Get familiar with the requirements – you’ll get buy in quicker if you speak their language
- Work together to identify synergies between their program and yours
- The more attention the RIM program gets and the better it is enforced – the more prepared you’ll be
maybe illustrate that records mgmt provides a foundation for being able to properly carry out compliance functions. Without that foundation, it's like a "leaning tower" or "house of cards"
What If It Gets Left to YOU?

So Many Hats and Only One Head

| Policy Management |
| Risk Assessment and Mitigation |
| Training |
| Allegations and Investigations |
| Multiple Risk Areas |
| RIM Policy and Retention Schedule |
| RIM subject matter expert on IT projects |
| Litigation Hold Management |
| Oversee Record Coordinator Network |
| Manage offsite storage accounts |
| Oversee shred program |
Merging Programs

- You need to understand it before you can do it
- You don’t need to be an expert overnight
- RIM requires on the job learning
- RIM doesn’t just focus on business records – the focus is on all of the organization’s information

- Paper or digital doesn’t matter
- You are already doing it – your program is being documented / recorded
- The goal of any RIM program is to ensure you have what you need when you need and that you get rid of it when it’s no longer needed

YOU CAN DO THIS
The Merging of RIM and Compliance

Build a Support Network

- Partner with IT, Legal, Information Security and Privacy – their goals are your goals
- GDPR requires local data protection officers – use your record coordinator network - dual roles ensure that the Privacy Office shares responsibility for managing the network
- Dual messaging, i.e.
  - “The best way to protect your data is to delete”
  - “Ensure GDPR compliance by following the Company’s Retention Schedules”
- In person compliance workshops and training are a great place to build support for your RIM program

Cross Pollinate

- Incorporate clauses related to recordkeeping in all of your policies referencing the RIM Policy and Retention Schedules and providing direction on where to get more help, i.e., intranet, etc.
- Update your Training
  - RIM: In addition to litigation hold, discuss the impact of recordkeeping on a bribery investigation or antitrust action – bring compliance into your RIM training
  - ABAC: Talk about how over and under retention impacts the accuracy and completeness of your records and prevents violations of SEC regulations
  - Competition: When discussing what to do in the event of a Dawn Raid talk about in how proper RIM practices make it easier to ensure the regulators get only what they are asking for and no more
  - Incorporate RIM into your Risk Assessment – we do a combined Global Privacy and Data Protection section which discusses RIM requirements in some detail
The Merging of RIM and Compliance

Cross Pollinate

Never miss an opportunity to talk about the RIM Program

<table>
<thead>
<tr>
<th>GOLDEN RULES FOR HANDLING PERSONAL DATA</th>
</tr>
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<tbody>
<tr>
<td>Use only the ABG networks or approved remote access portals to access your emails and documents</td>
</tr>
<tr>
<td>Lock away your papers when you are away from your desk</td>
</tr>
<tr>
<td>Do not keep personal data longer than you need it – follow the ABG Record &amp; Information Management Policy</td>
</tr>
<tr>
<td>Incidents happen! Tell us when things are lost, stolen or shared by mistake. Using the reporting procedure means we can help you take the right action.</td>
</tr>
<tr>
<td>Don’t work with personal data on your own devices or store data USBs, external hard drives, etc. unless these have been approved by or provided by the Company</td>
</tr>
</tbody>
</table>

The Merging of RIM and Compliance

Cross Pollinate

Never miss the chance to take advantage of a legal crisis
The Merging of RIM and Compliance

Make It Easy

In addition to developing training for all employees as well as one specifically directed at Record Coordinators to build their subject matter expertise, there is a dedicated section of the Business Ethics & Compliance website for RIM:

- Automated decision tree to determine what is a “business record”
- Training module on sending and retrieving records to and from offsite storage which demonstrates how to pack boxes, label and arrange shipment
- Record Coordinator directory by location/department so that employees can get their inquiries addressed by the local SME
**THE TIME IS NOW**

**TO ORGANIZE YOUR PAPER AND ELECTRONIC FILES!**

Reduce your paper files
on-site and archive
inactive business records

Get rid of unnecessary
office records

Review electronic records and emails.
Delete unnecessary emails and
archive inactive business records

[Image]

**TIPS FOR ORGANIZING PAPER**

Don’t let files get out of control.
Keep them neat and organized.
There’s nothing like a disorganized desk to make it hard to find files.

**ACT ON IT**

Does this sound familiar? You come into your office and have 15 new e-mails. On your desk are three folders with three letters that you need to respond to. You start with the letter and read a few sentences, but realize it is going to take more time than you think. You put that aside and start another task. You handle that task and your phone rings. You answer the phone and get pulled into a new obligation for 10-15 minutes. You return to your folder, but you’re stuck because you need that one email. You could just close it out and return to it later, but you have to stay focused.

Make a list of tasks that you need to do.

1. **Handle by date:** If you don’t have a specific deadline, handle the task as soon as possible.
2. **Handle by priority:** If you have multiple tasks, prioritize them according to their urgency.
3. **Handle by category:** Group similar tasks together to make it easier to handle them all at once.

**FILE IT**

Once you’ve decided what to file, you’ll want to revisit the file categories.

1. **File by category:** Group similar tasks together to make it easier to handle them all at once.
2. **File by priority:** Handle the most important tasks first.
3. **File by date:** Handle tasks that are due soon first.

**Effective File Management**

Keep electronic files organized.

1. **Use a filing system:** Use a filing system to keep electronic files organized.
2. **Use keywords:** Use keywords to make it easier to find files.
3. **Use categorization:** Use categorization to make it easier to find files.

**Questions?** Contact Corporate Records at avisbudget.com

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Don’t Try to Do It All Yourself

- Each member of our Compliance team has completed a basic records management course
  - National Archives provides a Certificate Course in Records Management https://www.archives.gov/records-mgmt/training
  - ARMA International is the world's leading information management membership organization - Membership is $175 and gives you access to free and paid training, resources and much, much more – www.arma.org
  - Local ARMA chapters hold regularly educational sessions and you do not need to be a member to attend. Find the chapter in your area and see what they are offering - https://www arma org/page/LocalChapters
  - Establish a group mailbox so that inquiries can be addressed on a timely basis at corporate.records@avisbudget.com by any member of the team

RIM and the Compliance Professional

Takeaways

- Consider records retention as critical to your compliance program
- Build a Support Network
- Cross Pollinate
- Make It Easy
- Don’t Try to Do It All Yourself
Thank You

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