RETENTION RULES IN HUMAN RESOURCE RECORDS

This use case was developed by members of the Iron Mountain Customer Advisory Board. It illustrates an effective use of event-based retention (EBR) rules.

In this use case a Human Resources department tested the efficacy of solutions outlined in Event-Based Record Guide on terminated or separated employee files.

DESCRIPTION OF ORGANISATION:

A United States-based investment and insurance company with property and casualty operations, group benefits and mutual funds.

CHALLENGE:

Human Resources (HR) records are a particularly difficult problem because they must be kept active while the employee remains employed and for a certain number of years after the employment terminates. The length of time employees may work at the company can span from weeks to decades. Many long term employees may change their name once or twice during their employment, adding to the complexity of record keeping. In addition, employees can leave the company and be rehired, turning previously inactive records active again.

In this use case, Human Resources records were spread across the organisation, housed in central file rooms at the Home Office, various field offices, and in file cabinets in manager's offices. Finding HR records when needed for litigation or regulatory inquiries was a time consuming and difficult task, and the files occupied valuable real estate space. In field offices, terminated employee files were often held onsite for years, until enough employees had terminated to fill a box for long term storage, resulting in significant over-retention of records.

SOLUTION:

All active HR records were moved offsite by file into open storage at our off-site storage vendor. The storage vendor indexed the files using the employee's name and a unique employee ID number. Going forward, all new HR Records contain

the employee's name and ID number, and the official copy is sent to the vendor to be filed in the employee's personnel file. Once a quarter, a list of terminated employees is sent to the vendor and those employee files are pulled from the open shelf, placed in a box or boxes and moved to long term storage. Those boxes are given an event date of the last day of the quarter, which starts the retention period for the records. If an employee is rehired, his or her record is pulled from the box in long term storage and placed back in active open shelf storage leaving the remainder of the employee files in the box to continue to count down their retention period.

The sensitive nature of the information contained in HR files makes security a top concern in this use case. Thus, the baseline requirements for success for this use case were:

1. Field office files were transported to the Home Office using a private courier service with a full audit trail so that any lost files could be identified.

2. Crews from the vendor securely picked up files from the Home Office and transported them to the local vendor storage facility.

3. The vendor indexed the files with a double blind check and then audited using the employee's first name and ID number.

RESULT:

The use case has been declared a success. Files of terminated employees are being sent to long-term archiving on a quarterly basis. Records are now 100% catalogued allowing HR staff to know within minutes if the company has a particular file that has been requested. The physical file is generally received in the Home Office within 24 hours of the vendor receiving a request for retrieval. In addition, valuable real estate space that had been used to store the files has been regained.

EVENT-BASED RETENTION GUIDE
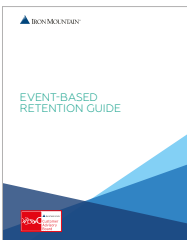
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