



Records Management & Corporate Compliance



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Global RM Governance

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Case Study

- P&G positioning the use of the retention schedule as a compliance issue and their alignment with other compliance groups (Ethics, Privacy, Info Security, etc).



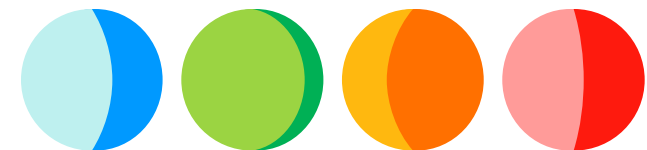
P&G Scale

- 2009 – 79B in sales
- 138,000 employees; 80 countries
- 140+ brands; 120 countries



P&G Scale

- Each business (10) runs independently
- 1# daily task – make/pack/ship
- 3B consumers

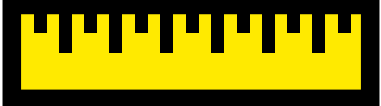


RM Policy Challenge

- Each employee review's their company records against the Corporate Records Retention Schedule (RRS) and report their activity annually



RRS History

- ? – August 2004; wasn't one
 - Localized attempts, some retention times in SOP's, etc.
- Other unique ideas
 - Ruler option 
- Non-uniform retention times, inconsistent destruction, drives up cost, corporate governance issue



RRS History

- US developed Jan 2002 – Aug 2004
- Launched via website, accessible globally
- International developed 2005, launched 2006



RRS Rollout

- 2004 – 2006
 - Identified Record Coordinators (RCs) throughout organization
 - Trained RCs in schedule and holding a records review day (RRDay)
 - RCs reported activity via a form



Compliance Adventure

- 2004 – Created Controlled Self Assessment (CSA) for Internal Audit
 - Function got a big shot in the arm from SOX, high profile
 - RM CSA rated Organizational, scored every 2 years



Compliance Disaster

- 2006 – CSA & Internal Audit = dud
 - 10,000 CSA, many were complex
 - Organizational section taking back seat
 - CSAs became dreaded and had to go back to the drawing board



“If we don't change direction soon, we'll end up where we're going.”

Professor Irwin Corey, comedian



New Compliance Direction

- 2006 – Started to work closer with Ethics
 - Business Conduct training recognized as important to our values
 - Competitive Intelligent headlines bolstered compliance issue (crisis capitalization)
- Included use of retention schedule and annual records review in Business Conduct training (WWBCM)



New Direction – Just In Time

- 2007 – Record Review Beast
 - 1,500 Record Coordinators (RCs) globally
 - Crushing amount of emails/contacts
 - RCs not driving deep in their organizations
 - RCs insulating their management
 - Needed to change record review execution & tracking
- Created Compliance CoP with Ethics, Privacy & Info Security



Decision For 2008

- End of RC role – move to Global Category Contacts to push from top
- Individual employee self-reporting
- Use of corporate training system for tracking & reporting
 - Ties into HR database
 - Consistent with Ethics, Privacy & Info Security were moving to the system too



Launched New Method 2008

- Provided generic memos (compliance theme)
- Quarterly status reports to management sponsors
- Reports follow company categories

Count of USERNAME BUSINESS UNIT TYPE	STATUS		Grand Total	% Complete
	Complete	Not Complete		
CF	7389	1492	8881	83%
GBS	6759	445	7204	94%
GBU	58230	19332	77562	75%
MDO	16680	10297	26977	62%
Grand Total	89058		120625	74%





Thank You for Completing Your Records Review Report!



Randolph MOELLER

Has completed an Annual Records Review Tuesday, July 29, 2008

Home

I certify that I have annually reviewed all my company records (hard copy, electronic, etc.) in accordance with the records management policy.

Submit and Exit

Exit Only

If you have any questions on this training or any other Records Management topic, send an e-mail to:

Recordshelp-IM

Thank you for completing your records review. Click the [Submit and Exit] button - RapidLearn will automatically log your completion.



Compliance Success

- 2008 – 91% of employees report their record reviews
- Started CoP Be Aware Blog



Compliance Theme



- 2009 – Revised New Hire training
 - Policy introduction and your responsibility to review records each year
 - Check with manager on any inherited records that may be under legal holds
- Compliance week

Your Personal Responsibility – Simply Do the Right Thing

14 September 2009

Welcome to P&G's first annual "Do the Right Thing" week!



Photos property of P&G

Compliance Future

- 2010 – Ethics will manage & track each compliance groups' mandatory training on a rotating basis
- Update Business Conduct manual & training – improve our section



Takeaways

- If it's policy, it's a compliance issue
- Aligning with groups (Ethics, QA, Internal Audit, etc) important to company can help everyone's program
- Targeted training changes culture
- Easily accessed retention schedule



Touching lives, improving life. *P&G*

