Bogdan Florin Popovici[*]

GENERALLY ACCEPTED RECORDKEEPING PRINCIPLES® (GARP®): A PRESENTATION

Abstract:

GARP® is a set of principles developed by ARMA International for assessing recordkeeping programs. Broader and more abstract than ISO 15489, GARP® is more versatile and potentially more easily usable in different countries. The article is a presentation of GARP® and its Maturity Model.

Key words:

recordkeeping program, records management program, GARP®

Izvleček:

Predstavitev Splošno sprejetih načel hrambe dokumentov (GARP®)

GARP® predstavlja niz načel, ki jih je razvila organizacija ARMA International za vrednotenje programov hrambe dokumentov. Načela GARP® so širša in bolj abstraktna kot ISO 15489, pa vendar bolj raznolika in potencialno bolj uporabna v različnih državah. Prispevek je predstavitev načel GARP® in njihovega Maturity-modela.

Ključne besede:

program za hrambo dokumentov, program za upravljanje z dokumenti, GARP®

INTRODUCTORY NOTE

Perhaps few people foresaw the extraordinary impact of ISO 15489 over the development and the worldwide spread of records management or the management of the records in the early stages of their lifecycle[1]. This standard became so much a professional best seller, that some colleagues, joking or not, claimed to be free and not affected by copyright—as a common good of our profession. If one tries to identify the main reasons this document became so popular, one might say it incorporates, as in a very good reference, the basic milestones as for professionals and for beneficiaries of records management who, by reading it, may understand better *what this RM guys want?*

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[*]   *Bogdan-Florin Popovici, PhD, archivist, Arhivele Nationale, Str. Gh. Baritiu nr. 34, 500025 Brasov, Romania.*

[1]   *Due to the international audience of the paper, I would like to identify some conceptual issues. In some countries, the management of the records in the early stages of their lifecycle is covered by archival science; by contrast, mainly in Anglo-Saxon world, this area is covered by records management. According to R. Pierce Moses A Glossary of Archival and Records Terminology (http://www.archivists.org/glossary), records management means "The systematic and administrative control of records throughout their life cycle to ensure efficiency and economy in their creation, use, handling, control, maintenance, and disposition"; recordkeeping, on the other hand, means "the systematic creation, use, maintenance, and disposition of records to meet administrative, programmatic, legal, and financial needs and responsibilities."*

GENERAL OVERVIEW

Despite it is not as famous as ISO 15489[2] (even though it was adopted early in 2009 by the Society of American Archivists), the Generally Accepted Recordkeeping Principles® or GARP® tends to fulfill a similar role, of a basic professional landmark. In comparison with ISO 15489 GARP® is much more theoretical, more general, and, I might say, much more flexible and versatile in implementation, over different recordkeeping (and records management) practices. In fact, it lists the basic principles for a proper recordkeeping and, by this, the main outcomes of a recordkeeping program. In this regard, GARP® is useful for:

- Regulators - To protect the public by assuring access about the operations, policies and procedures of regulated companies

- RIM Professionals - To measure the records management programs of companies in a consistent and systematic manner

- Businesses - To document to regulators and the public that information will be available from these companies if ever needed.[3]

WHO OWNS IT?

GARP® was developed by the US based ARMA International (former Association of Records Managers and Administrators), who owns the sole property over GARP®, the GARP® Information Governance Maturity Model, and all related presentations, downloads, and materials pertaining to GARP®[4].

Principles

GARP® promotes 8 principles, aiming to cover the whole range of media, organizations and legal environment.

"These principles are comprehensive in scope, but general in nature. They are not addressed to a specific situation, industry, country, or organization, nor are they intended to set forth a legal rule for compliance that must be strictly adhered to by every organization in every circumstance. They are intended to set forth the characteristics of an effective recordkeeping program, while allowing flexibility based upon the unique circumstances of an organization's size, sophistication, legal environment, or resources."

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[2] *A short comparison between the two products in Gordon E.J. Hoke, Ten Years After: RIM Standards Evolve Slowly, available at http://content.arma.org/IMM/ColumnsWebExclusives/columnwebexclusivetenyears after.aspx (last visit 2011-11-17).*

[3] *Generally Accepted Recordkeeping Principles: Where it's at, what it means, and what to look for, available at www.arma.org/garp/GARPoverview.pptx (last visit 2011-11-17).*

[4] *About ARMA International and the Generally Accepted Recordkeeping Principles ®: ARMA International (www.arma.org) is a not-for-profit professional association and the authority on managing records and information. Formed in 1955, ARMA International is the oldest and largest association for the information management profession with a current international membership of more than 10,000. It provides education, publications, and information on the efficient maintenance, retrieval, and preservation of vital information created in public and private organizations in all sectors of the economy. It also publishes Information Management magazine, and the Generally Accepted Recordkeeping Principles ® (GARP ®). More information about GARP ® can be found at www.arma.org/garp.*

These principles [sometimes summarized as **A**(ccountabilty)–**T**(transparency) **I**(ntegrity) **P**(rotection)–**C**(compliance) **A**(vailability) **R**(etention) **D**(isposition)[5]] are presented below.

"Principle of Accountability = An organization shall assign a senior executive who will oversee a recordkeeping program and delegate program responsibility to appropriate individuals, adopt policies and procedures to guide personnel, and ensure program auditability".

This principle addresses the accountability over the program of recordkeeping itself. Often, organizations failed to implement proper practices to manage records because the position of the professional staff is very low in hierarchy and nobody really cares about their supporting activity. Also, even though policies are adopted, they are neglected by the people in the organization because such policies and programs might lack consistent support for top level management or different divisions have different interests and subordinations, neglecting policies issued by other divisions. Applying this principle not only gives to a program for managing records the proper authority and support inside an organization, but it also provides a way of auditing the implementation. About this last item (auditability), GARP states it covers the following aspects:

- *"Staff should be able to demonstrate program awareness.*

- *Records should be retained for the right amount of time and disposed of when no longer required.*

- *Policies should be kept up-to-date and cover all records media.*

- *Auditing should verify the status of complying with these standards".*

"Principle of Integrity = A recordkeeping program shall be constructed so the records and information generated or managed by or for the organization have a reasonable and suitable guarantee of authenticity and reliability."

This principle addresses the issue of the authoritativeness of the records created inside an organization. If proper implemented, a recordkeeping program should prove the integrity and authenticity of the records. Covering the first three characteristics of authoritative records presented in ISO 15489 (authenticity, reliability, integrity), this principle also covers the need to manage all the records of an organization, as a whole, no matter the medium and types. A special emphasis is put on the need of having the audit trails of the events in the records lifecycle and the reliability of the system that manage them.

"Principle of Protection = A recordkeeping program shall be constructed to ensure a reasonable level of protection to records and information that are private, confidential, privileged, secret, or essential to business continuity."

This principle covers several issues regarding the access and disclosure of the information. As it is common knowledge, information is an asset of organizations that might be interesting for third parties. In this regard, a recordkeeping program should envisage the necessary security measures in order to protect the information of being

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[5] *Nick De Laurentis, GARP ® Maturity Model Is Your Organization Ready? at http://www.slideshare.net/NDe Laurentis/20100407garp-maturity-model.*

disclosed outside of the organization. In the same time, the program must require that only authorized personnel can access certain information. This is more present these days, when social networking is an important involuntary source for disclosure of sensitive data, not to mention the cyber criminality. In the same, time, this principle should be applied in the records destruction phase; if not properly performed, a records destruction might lead to disclosures.

"Principle of Compliance = The recordkeeping program shall be constructed to comply with applicable laws and other binding authorities, as well as the organization's policies."

One important issue in the contemporary organizations is the multitude and the diversity of standards, policies, regulations etc. that different divisions or entire organization must obey. The goal of a good recordkeeping program is to ensure that all the applicable laws, standards, code of conduct etc. are applied in respect with records, that all the records contain the elements required and that they are managed accordingly, no matter what field or division of the organization. The recordkeeping system should be a tool for providing accountability on the legal behavior of the organization.

"Principle of Availability = An organization shall maintain records in a manner that ensures timely, efficient, and accurate retrieval of needed information."

Often, the records are physically stored in improper conditions that lead to a quick and severe deteriorations. On the other hand, for the purpose of protection, some employees keep the records in their own office, also in improper storage environmental conditions. In the IT systems, the upgrade often neglects previous data, and, in short time, they might become unreadable. All these situations are covered by this principle whose implementation would require to an organization to take proper measures for keeping records usable over time (*usability*—in ISO 15489). In the same time, the principle approaches the need for proper finding tools and proper training for employee in order to find information, in a manner that serves the interests of an organization.

"Principle of Retention = An organization shall maintain its records and information for an appropriate time, taking into account legal, regulatory, fiscal, operational, and historical requirements."

Not once these days, the automated operational systems are designed taking into account only the present day needs. I mean, the systems are designed with no clue to the amount of information that will be stored and that, at a given moment, it will need too many resources to be maintained. In this regard, this principle require for an organization to pay attention to the determination of retention periods for records. That is, a record should be kept only as long as its legal and regulatory, fiscal, operational or historical values last; it should be eliminated after this retention periods expire in order to save valuable resources of being wasted in maintaining records that have not longer value.

"Principle of Disposition = An organization shall provide secure and appropriate disposition for records that are no longer required to be maintained by applicable laws and the organization's policies."

116

Following the previous principle, records whose retention periods expire should be disposed, in order to save the resources and protect organizational interest. Also, those records of ongoing need should be transferred to another facility or to an historical archive. In either case, the organization should ensure a proper documentation of its actions and to ensure the removal of the records and all its derivatives (working copies, backup files etc.) beyond the possible restoration.

"Principle of Transparency = The processes and activities of an organization's recordkeeping program shall be documented in an understandable manner and be available to all personnel and appropriate interested parties."

This principle addresses the mandatory requirement of documenting every aspect of a recordkeeping program, both for the people working in an organization and implementing, by every step of their activity, the program requirements and for those who audit the system.

THE MATURITY MODEL

Based on GARP®, ARMA International developed the so-called *Information Governance Maturity Model*. This is a sort of scale for assessing the development of recordkeeping program inside an organization and to help improve it. The Maturity Model consists of 5 levels that are listed below (excerpts from original). For each of 8 principles, the 5 levels are applicable[6].

Level	Description	Organizational impact
Level 1 (Sub-Standard)	"Recordkeeping concerns are either not addressed at all, or are addressed in a very ad hoc manner".	Organizations should be concerned "that their programs will not meet legal or regulatory scrutiny."
Level 2 (In Development)	"There is a developing recognition that recordkeeping has an impact on the organization, and that the organization may benefit from a more defined information governance program."	Organizations are "still vulnerable to legal or regulatory scrutiny since practices are ill-defined and still largely ad hoc in nature."
Level 3 (Essential)	There are "defined policies and procedures, and more specific decisions taken to improve recordkeeping."	Organizations "may still be missing significant opportunities for streamlining business and controlling costs."
Level 4 (Proactive)	"Information governance issues and considerations are integrated into business decisions on a routine basis, and the organization easily meets its legal and regulatory requirements."	Organizations "should begin to consider the business benefits of information availability in transforming their organizations globally."
Level 5 (Transformational)	There is an integration of "information governance into organization overall corporate infrastructure and business processes to such an extent that compliance with the program requirements is routine."	Organizations "have recognized that effective information governance plays a critical role in cost containment, competitive advantage, and client service."

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[6]   *The full chart is available here http://www.arma.org/garp/Garp%20maturity%20Model.pdf (visited 2011-11-15).*

CLOSING REMARKS

This new product on Records management/recordkeeping field adds a supplementary value to our profession, by making it more organizational oriented. Speaking from my perspective, as archivist at the National Archives of Romania, that has the right of inspection over the "records management" practices of different organization, I faced many times a serious lack of understanding for "what these rules are useful for?" or "these rules for filing etc. are not suited for me, so I decided to do nothing". GARP® brings a more systematic way of explaining the final outcomes of a records management/recordkeeping program and a more measurable way of identifying the compliance. I consider it would be an interesting experience to implement it outside of its originating country, as a best practice case[7].

POVZETEK

PREDSTAVITEV SPLOŠNO SPREJETIH NAČEL HRAMBE DOKUMENTOV (GARP®)

Strokovna orodja za upravljanje z dokumenti so dobila novost, ki jo je razvilo združenje ARMA International. Orodje, imenovano GARP® (Splošno sprejeti principi hrambe dokumentov), opozarja na potrebo po ocenitvi programa hrambe dokumentov. GARP® sestavlja 8 principov, ki pokrivajo širok spekter medijev, organizacij in pravnih okolij: odgovornost, transparentnost, celovitost, zaščito, skladnost, dostopnost, čas hrambe in uničenje. Skupaj s principi je na voljo tudi lestvica t. i. "zrelosti" implementacije principov hrambe dokumentov. Ta zrelostni model ima 5 nivojev skladnosti, začenši s "podstandardom" do "transformacije", vsak od njih pa opisuje nivo skladnosti glede na principe.

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[7] *A good presentation of GARP® and some practical examples in Jason C. Stearns, Employing the Generally Accepted Recordkeeping Principles® (GARP®) to Identify Practices for Efficient and Compliant Electronic Records and Information Management, available at https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/ 1794/11208/Stearns-2010.pdf?sequence=1 (2011-11.17).*