

WHITE PAPER

INTERNAL COMPLIANCE: THREE KEY STRATEGIES TO IMPROVED INFORMATION DESTRUCTION

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IT STARTS EARLIER THAN YOU THINK

When it's time to securely and completely destroy sensitive paper documents, a proper disposal process is no longer optional. You need a rigorous, auditable chain of custody with careful controls to ensure the confidentiality and security of those documents prior to their thorough destruction and disposal. The regulatory penalties alone for lapses and failures are too high a price to pay, to say nothing of the publicity and shareholder dissatisfaction.

At first glance, it's easy to believe that the chain of custody for secure shredding starts with the vendor who should undergo careful scrutiny and ongoing monitoring. In reality, the chain of custody begins much sooner - at the point when the employee decides that a confidential paper document is no longer needed - and well before the contracted vendor enters the picture. That's why it's essential to adopt a more holistic view of the shredding chain of custody by strengthening the internal processes that take place before the vendor picks up materials to be destroyed.

Savvy companies understand the importance of this perspective because the damage from any lapse will ordinarily and primarily accrue to the company, regardless of where the document breach occurred. Culpability begins and ends with the document's original owner. When the adverse publicity hits, the fallout impacts your brand and reputation, not just your legal standing and finances.

That's why internal compliance with your secure shredding initiative, prior to handoff, is just as important as partnering with a strong, reliable vendor. But, how do you get everyone in the organization to take their responsibilities seriously and be accountable for their participation and compliance with your secure shredding initiatives? This paper describes three key strategies to increase the likelihood that employees "do the right thing" when faced with a paper document that they no longer need.

STRATEGY NO. 1 – COMMUNICATION: BUILD A CULTURE AROUND SHREDDING COMPLIANCE

The challenge surrounding the adoption of a shredding policy is achieving sustainability across the organization so that your program doesn't fade from the corporate culture within weeks or months of implementation.

Obviously, you can't stand next to all your employees - all day, every day - and coach them about how to dispose of their confidential documents. Instead, you need to fully and memorably communicate to all of them about their duties and why it's important to follow your prescribed process. Building a culture of shredding compliance starts with communicating a range of key messages to all employees through different channels on a regular basis.

- **Make It Company Policy.** Most companies find that it's effective to start their shredding program by creating a formal employee policy defining what documents must be shredded, which ones are optional, and which ones do not require shredding. What constitutes the best policy? It depends - and the right answer carefully balances simplicity and cost. For example, a "shred all" policy is easy to remember. Regardless, all good policies use simple, clear language. The best policies are regularly reviewed and updated as needed - for instance, as businesses are acquired or divested.
- **Get It in Writing.** As they do with most new policies, many companies find that it's good practice to obtain a signed acknowledgment from employees confirming that they've read, and that they

understand and accept, the company's compliance requirements for shredding sensitive documents. This closes up a potential loophole.

- **Execute an Internal Communication Strategy.** Setting the stage for internal compliance with shredding policy begins with communication. The key is to use a series of effective communications vehicles to execute a complete announcement strategy. Examples include a pre-launch communication letter to managers and employees and an initial organization announcement at time of launch. Many companies find it's a good idea to describe the shredding policy in new employee orientations and to provide occasional reminders at team and department meetings. In addition, program posters placed at the point of disposal can reinforce the importance of an organization's shredding policies and encourage employee participation. For examples of these and other communications, ask your Iron Mountain representative for a copy of the Secure Shredding Implementation and Education Guide.
- **Conduct Regular Follow-up Communications.** Regular reminders, perhaps quarterly or semi-annually that reiterate the company's shredding policy, are an important element of the communications plan. Some companies even put up posters in common areas to help keep the shredding policy near top of mind and to ingrain the process within the company culture.

STRATEGY NO. 2. – CONVENIENCE DRIVES COMPLIANCE

When it comes to secure shredding, there's one inescapable truth that should govern deployment efforts: convenience drives compliance. The closer the points of disposal are to employees, the greater the compliance with shredding policies. If containers are too far away or are continually stuffed to the brim because of too few containers in the vicinity, compliance will naturally decline.

Some companies build extra steps into their shredding processes to drive up the convenience factor for employees. For instance, in some companies, deskside shred containers can be deployed to eliminate the need for an employee to walk down a hall to a publicly located, locked container for disposal. Instead, the employee collects documents to be shredded in a small container and periodically brings a deskside container of documents to be shredded to the shared container. This minimizes employee inconvenience without requiring an overabundance of public containers.

An overused public container can bring a shredding initiative to a complete halt. What's particularly threatening about this scenario is the long-term damage it inflicts: confidence in the program can fade quickly and employees will soon return to their previous routine. The result is that you pay for a shredding program that's not being properly used - and you remain vulnerable to breaches.

Finally, don't underestimate the importance of aesthetics. The fact is, higher concentrations of sensitive documents can be found in executive suites, where expensive furniture is the standard. Few companies want large plastic containers with steel padlocks incongruously situated next to elegant mahogany credenzas. For certain deployments, consider investing in containers with low-key appearances that are more appropriate for high-profile locations.

STRATEGY NO. 3 – REPORTING: WHAT'S MONITORED IS WHAT'S MANAGED

In addition to communications and convenience, shredding program success depends heavily on the ability to measure and monitor program participation. This kind of visibility should be a prime objective when implementing your shredding program.

While “Management by Walking Around” is a time-honored technique for executives, it isn't a strategy for managing the shredding program for a multi-location company. Walking around to look at shredding containers and making anecdotal observations won't give you the true visibility you need.

Instead, consistent reporting across all locations can be one of the most effective methods for ensuring visibility and oversight. Best practice favors vendors who

can provide consistent, timely reporting across all locations to guide decision-making and program development.

Top-notch shredding partners can capture utilization data and time of service for all of your containers so that your company has a time-stamped proof of service for every location. This creates a granular audit trail through which you can show that all of your locations have been set up with a shredding program. You can show the utilization percentages for individual containers and hundreds of locations. You can show the service schedule. And you can even show specific receipts for pickups at individual locations.

With Iron Mountain, you have access to the data you need to get a complete, comprehensive

picture of the trends that merit further investigation. For instance, perhaps utilization has increased on a select number of containers - or there have been an unusual number of full containers, necessitating a series of on-demand pickup requests that can be more expensive than scheduled pickups. Does that department need more containers - or was this the result of a seasonal cleanout?

You might detect a decrease in utilization from another location. If so, you may be able to reduce the number of containers or decrease the frequency of pickups to save money. Without complete data, it's impossible to make these decisions confidently and accurately, and for distributed organizations, this data can be very difficult to collect and aggregate.

CONCLUSION

Internal compliance is an often overlooked cornerstone of a successful shredding program. To achieve a sustained level of participation in a corporate shredding program, administrators should work diligently to create a culture of compliance that encompasses a comprehensive internal communications program. Because convenience drives compliance, another key factor is to simplify shredding participation. Finally, companies should carefully monitor participation and optimize their shredding through regular detailed reports and analysis.

For more information about cost-effective and comprehensive secure shredding services, visit the Iron Mountain Web site at www.ironmountain.com.



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