Information Governance Executive Briefing Book

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Foreword

"It is clear that [the] lack of a retention policy and irresponsible data retention practices are responsible for the loss of significant data... Information management policies are not a dark or novel art. Numerous authoritative organizations have long promulgated policy guidelines for document retention and destruction."

Philip M. Adams & Associates, LLC v. Dell, Inc.

There used to be an open secret about records and information management. Nobody talked about it, but everyone believed it. The secret? If all you did about was write a bunch of words on a piece of paper, call it a policy, and put it in a binder on a shelf somewhere, you were good. You had taken care of your problem

That era is over.

Today, courts, regulators, and other outside parties have grown in sophistication and expertise when it comes to IG. Dead policies on dead trees don't work. Today, your efforts program needs to be comprehensive, funded, enforced, and real. Recent cases demonstrate this. For example, in the case quoted above, the court not only looked for the existence of program, but evaluated the legitimacy of various aspects of the program in detail. It questioned the lack of policies, stating that the litigant "did not have a... information management policy" and questioned why it offered "no statement from management-level persons explaining its practices, or existence of policies."

"Information workers, who comprise about 63% of the U.S. work force, are each bombarded with 1.6 gigabytes of information on average every day through emails, reports, blogs, text messages, calls and more..."

"Don't You Dare Email This Story," Wall Street Journal

Most statistics on the volume of digital information organizations create contain numbers so large that they are hard to comprehend (for example, "the digital universe" is 281 exabytes in size). Organizations experience 30, 50, or even 100 per cent annual growth in the volume of information they store. The trend doesn't seem to be slowing down. Although the cost of storage hardware continues to drop, storage hardware costs are just the beginning. According to International Data Corporation, the total cost of storage ownership "far outweighs the initial purchase price" of the hardware, and includes factors such as migration, outage, performance, information governance, environmental, data protection, maintenance, and staff costs.

Organizations often claim that they are just keeping a piece of information "for now." Without a firm plan in place, this really means "keeping it forever." After all, unless you plan on keeping a piece of information forever, you will need to make a destruction decision about it at some point. Will that destruction decision be easier or more difficult in the future?

So, the courts, regulators, and others from outside our company are looking at your information practices with a magnifying glass. The volume of information your organization creates every day is growing dramatically. What should you do?

Information Governance (IG) is what you should be doing. You may have heard of this concept already, and perhaps have some idea of what it is all about. However, like any new concept, it can be difficult to get a good grounding in its fundamentals. This is what we are hoping to achieve with this Briefing Book - provide senior executives with an introduction to the concept of IG and how it might apply to their organizations.

IG is not a panacea, but it is a very useful lens through which to view the growing information problem. I hope you find the materials in this Book useful.

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Barclay T. Blair, President

Stepping Up to a Moving Plate

The ViaLumina Executive Brief series on Information Governance provides business leaders with a grounding in the fundamentals of IG and how it should affect business, legal, and IT strategy.

Since the role of CIO was created in the late 1970s, there has been almost continuous debate about the precise nature of the CIO's role. This debate continues today, with many inside and outside the CIO community debating the future of the role in the face of cloud computing, consumerization of IT (see: iPad) outsourcing and other disruptive developments. Information Governance (IG) - with its focus on enterprise information strategy - adds to the confusion. Should IG be "owned" by the CIO? If not, what should the CIO's IG role be?

The title "CIO" is a misnomer for the legion of CIOs who are in fact not actually responsible for enterprise *information*. Rather, they are responsible for the systems that house and transmit that information. For these CIOs, the title Chief Infrastructure Officer is perhaps more apt. This dichotomy was noted very early in the development of the CIO concept, with a 1984 IT publication noting, "Appointing a chief information officer also raises the question of who owns databases - those who maintain them or those who produce them?"

title.

Defining a Role

The potential scope of the CIO's role in IG can be defined by these opposing polarities:

The first is a largely a continuation of the traditional CIO role: support and enable business success by providing IT in the most strategically sound and cost-effective manner possible. This vision eschews direct responsibility for the information moving in, out, and around the IT environment. In this view, the CIO's role in IG, then, is to provide the environment for IG, but not to own or drive decisions related to the value and risk of information - such as retention and disposition. While this vision may reflect the preponderance of current CIO opinion, it also begs the question: if it's not the CIO's role, then whose role is it? The widespread failure of organizations to answer this question conclusively is at the root of IG failure.

The second is an expanded - or even profoundly modified - CIO role; one that takes on strategic responsibility for driving the information (as well as the infrastructure) agenda. In this view, legal acts largely as a service organization to IT, providing the legal and compliance requirements that IT needs to implement in the information environ-

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The Role of the CIO in Information Governance

IG success depends on having a good answer to this question. While some CIOs may believe that their role is clear (i.e., information is "owned" by the business, not them), it may be less clear to other C-level executives. Perhaps they can be forgiven for this misunderstanding, given the existence of the word "Information" in their colleague's



ment. The CIO takes on a gatekeeper - as well as a service provider role - ensuring that the IT desires of the business units they serve comply with corporate IG requirements. In a world where some believe that value of the CIO is being eroded, the possibility to establish leadership where there currently is a vacuum should excite any CIO looking to secure and expand their institutional value.

Taking Action

IG suffers from a corporate governance vacuum. Leading organizations are working to fill that vacuum. Some are filling it with attorneys. Some are filling with evolved records management groups. A variety of approaches abound. In any case, as this transition occurs, ViaLumina believes that is time for CIOs to fundamentally re-examine their role in IG, and concurrently, for organizations to seriously evaluate an expanded role for the CIO in IG. Some of the reasons for this opinion include:

- Architecture. The CIO drives technology architecture. IG demands a clear and profound vision regarding the central role that technology and IT architecture play in IG success. Nobody is better positioned to provide this leadership than the CIO.
- · Complexity. The Office of the CIO is best positioned to understand, mange, and communicate the complexity of the IT environment. This is essential for organizations wishing to, for example, defensibly rid themselves of unnecessary and outdated content.
- Execution. The structured project planning and execution that is part of the IT DNA is essential for acting in a consistent and defensible manner in the IG space.
- Technology solutions. IG success is not possible without intelligent applications and tools. Evaluating, implementing, and operating these applications across the IT in a way that drives IG consistency cannot be done without CIO leadership and accountability.

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Why Information Governance?

Barclay T. Blair, President

What is Information Governance?

Information Governance (IG) is a new approach to managing information. It builds upon and adapts disciplines like records management and retention, archiving, business analytics, and IT governance to create an integrated model for harnessing and controlling enterprise information. The ultimate purpose of IG is to help organizations maximize the value of information while minimizing its risks and costs.

The ViaLumina Executive Brief series on Information Governance provides business leaders with a grounding in the fundamentals of IG and how it should affect business, legal, and IT strategy.

Why is Information Governance Important?

- is possible).
- today's organizations.
- directly control.

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"Top-down support is critical to the success of any Information Governance Strategy." The Future of Enterprise Information Governance: Economist Intelligence Group

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Although IG is built upon a foundation of existing disciplines, it is an evolutionary model that requires organizations to make real changes. Ingrained habits must be broken (e.g., information hoarding, treating information as a personal vs. corporate asset); new corporate governance structures built (e.g., real C-level accountability); and new technologies implemented and outdated IT practices curbed (e.g., using backup tape as archives).

IG is based on two key tenets. **One**: an organization cannot not achieve or sustain long-term success without managing and harnessing its information effectively. Information mismanagement destroys business value, slows organizations down, creates unnecessary risk, and is - simply - unsustainable. Two: existing approaches to information management are broken. A new approach is needed. How are existing approaches broken? Here are some examples.

· Records management. Some key assumptions of traditional records management are simply untenable in today's organizations (e.g., that the difference between a "record" and a "non-record" is absolute; record volume is low enough that employee classification will take minimal time; and that centralized "command and control"

• Keep everything forever. Buying more, bigger, and cheaper storage devices is not a sustainable way to solve the incredible and unstoppable growth of content in

· Complexity. Existing approaches to managing unstructured (i.e., spreadsheets, word processing documents) and structured (i.e., databases) are often too simplistic for the complexity of our information environment. Today "records" exist in multiple parts on multiple systems in multiple geographic locations that we may or may not

• Corporate governance. Existing governance structures are largely ineffective for information management. Most organizations - to their serious detriment - cannot clearly identify whether it is the CIO, the General Counsel, line of business VPs, or some other person who ultimately "owns" this problem. And, that is the problem.

· Reliance on employees. Most information management programs suffer from mutually exclusive goals: we want employees to spend less time finding and using information, but we want them to spend more time helping us classify and manage information. The result is not practical or sustainable.

· Poor use of technology. Technology enabled this problem. It's also part of the solution. Contemporary technology that helps us understand the nature and value of content with minimal human intervention is part of the solution. So are intelligent archiving and content management solutions that enable capture, retention and disposition of information according to a well-planned lifecycle. These solutions need to scale across both structured and unstructured information systems.

Taking Action

IG is an evolutionary process. Here are some of the most useful places to start when building - or improving - your IG program.

- Do you really have a program? Every large organization has some kind of records and information management program. Unfortunately, many of these programs were created in an era where content was both created and managed centrally (think "steno" pools and file rooms). Executives are too easily satisfied on this issue when they look at an org chart and see a records management department (usually comprised of 1 person). Is this really helping - and not actually harming - your organization?
- Whither corporate governance? Many executives mistakenly assume that the person on the management team with "Information" in his or her title is taking care of the information management problem. However, while most CIOs view infrastructure (software, hardware, cables) as their problem, they consider the information flowing through that infrastructure to be someone else's problem (i.e., usually the people who created the information). On the flip side, most group managers say that they do not have the authority, knowledge, or money to control what happens in IT. Information management falls into this divide, to your detriment. The corporate governance side of IG is critical.
- Do you have the right tools? Successful IG programs exert the right amount of control over the information environment without stifling collaboration and creativity. Some areas of your business need more control than others. Control may mean strict and detailed retention and disposition capabilities, or it may just mean basic access controls that facilitate customer interactions. You need flexible enterprise content management tools that enable employees to perform at their best while maintaining the right level of control and governance.

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Getting Started With Information Governance

Barclay T. Blair, President

The ViaLumina Executive Brief series on Information Governance provides business leaders with a grounding in the fundamentals of IG and how it should affect business, legal, and IT strategy.

For this company, the very thought of yet another attempt to get this under control is enough to cause heart palpitations in the CIO, the general counsel, and a number of other staff. It doesn't have to be this way. Large organizations clearly face real complexity in tackling IG, but IG progress and success is possible - if we go pick the right place to start. "Boiling the ocean" is an impossible task, but it is not our task in IG.

Finding the Starting Line

Most organizations have some level of IG program in place, but these programs are typically insufficient in both structure and scope. IG requires several new activities, but picking the right place to start is difficult and also different for every organization. One thing is clear, however: a reasonable and defensible approach does not require that we start by remediating our mass of legacy content. Many companies unfortunately do view this as the first step. Given that this step can feel like stepping off a ledge, it makes sense that their IG projects are often paralyzed.

Instead, organizations should focus first on building the environment they want to move towards; then implementing those foundational pieces; and only then cleaning up their environment by migrating legacy content in an ordered and selective way. This is not the only way to approach IG, but it is a useful framework. Here's what it looks like:

- so on.

- IT requirements and opportunities.

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Information mismanagement destroys business value, slows organizations down, creates unnecessary risk, and is, simply unsustainable.

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Information Governance Executive Briefing Book

Who's Ready to Boil the Ocean?

Imagine a company that has several terabytes of email. Some of it was created by legacy email systems, some sits in local archives on employee hard drives and network shares, some has been captured by a partially-implemented email archive, and some is ..., "who knows where?" The company also has thousands of poorly managed backup tapes - some in an offsite storage facility, some in the data center, and some in ... "we aren't too sure." They've never deleted information from their ERP system. They have terabytes of data created by custom billing and project management applications.

1. Foundation. Creating the foundational elements, such as: policies, procedures, governance structures, long-term vision and IG strategy, technology strategy, and

2. Implementation. Putting the foundational elements in place both in the culture (through training, change management, etc.), and in the IT environment (through new tools, applications, and architectures).

3. Remediation. Cleaning up existing content as part of the process of migrating employees and their data to the new environment.

4. Continuous Improvement. IG is a moving target. As such, you are never "finished" and must constantly work to improve the program and address business, legal, and

Taking Action

This Brief provides a framework for getting started with IG. But, what are some of the practical activities you can undertake now? Here are some ideas, based on building successful IG programs with our clients.

- **Take the long view**. We advise our clients to use a three-year planning window for IG. Any shorter is unrealistic, and any longer is useless. Bucket potential projects into year 1, 2, and 3 buckets by risk, value, and practicality. Temper aspirational planning with brutal honesty about your operating environment.
- **Convert "issues" into "projects."** Organizations cannot act on issues. Executives cannot make decisions on issues. Action is only possible when issues are expressed as potential projects that have the dimensions of time, cost, level of effort, dependencies, and risk. Everyone understands that information mismanagement is a problem, but you will never solve that problem until you can define it as a series of actionable projects.
- Tackle the triumvirate of pain. Experience has taught us that most organizations should have the same three projects at the top of their list: 1) email 2) unstructured content in desktop and shared drives, and 3) backup tapes. Apply the framework to each of these three problems.
- **Pilot the program**. Pilots are common in the IT world for a reason: they are a great way to test the strengths and weakness of technology in a "real-enough" environment that will not break the company if it fails. Pilot your IG program the same way. Try out the entire package from policy to training to implementation on a small group first (we often advocate HR as a starting point). Learn, improve, and then implement broadly.
- The really hard problem. Managing information requires cultural change. Cultural change is tough, and will not happen unless it is driven from the top. If senior management does not lead this change in a real and personal way, enterprise IG will not happen. Plan accordingly.

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Governing SharePoint

Barclay T. Blair, President

The ViaLumina Executive

The Emergence of SharePoint

"As soon as IT sets it up so that people can self provision and create these new sites, it's always amazing to see how it proliferates . . ."

Bill Gates, speech at the first Microsoft SharePoint Conference, May 15, 2006

Brief series on Information Governance provides business leaders with a grounding in the fundamentals of IG and how it should affect business, legal, and IT strategy. Microsoft history, e began with

> However, there is an inherent tension between some of the philosophies at the heart of SharePoint and the requirements of IG. As the quote above illustrates, one of SharePoint's key attractions - for IT at least – is the ease with which users can set up and use SharePoint sites with little to no involvement from IT. While this may drive adoption of the product and reduce the burden on IT departments, it can make IG more challenging.

> This is the role of SharePoint governance – the rules and processes organizations must adopt to ensure that they are leveraging the strengths of SharePoint, but also maximizing the value – and minimizing the risk - associated with the information managed by SharePoint.

Information Governance and SharePoint

The tight integration of SharePoint with other Microsoft products, and the ease of provisioning and using SharePoint, clearly is a key part of the product's value to an enterprise. However, at the same time, enterprises using SharePoint to manage business records must meet IG requirements such as access control, confidentiality, retention, ediscovery, and disposition. The tension between these two needs – keeping SharePoint attractive for employees to adopt and use, while exercising enterprise control, defines the SharePoint governance challenge.

Success in SharePoint governance is about finding the right balance. To achieve this balance, organizations should first define the baseline level of governance that they must achieve in SharePoint, and then build out from there over time. Key governance targets that organizations should address include:

1. **Provisioning and sunsetting.** Organizations should create standardized procedures for how SharePoint sites are provisioned - addressing issues such as approval processes and site organization and hierarchy. Ideally, a site owner should be defined, both by name and role. In addition, organizations should develop a

Information Governance

Boiling the ocean is an impossible task, but it is not our task in Information Governance.

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Microsoft's SharePoint Server, the company's fastest growing server product in history, enables organizations and work groups to collaborate and share information. However, by introducing Information Governance (IG) capabilities (a process that began with SharePoint 2007) Microsoft has attracted SharePoint buyers seeking to exert greater control over the information their employees create and share.

Executive Brief Series - Spotlight on Information Governance

standardized mechanism for sites that are no longer used. Should the information be deleted? Archived? These decisions are not possible unless the enterprise knows what the purpose and function of the site was (this is why defining site ownership by name and role is critical).

- 2. Site organization and metadata. Organizations should determine if all SharePoint sites should be organized in a standardized way, and whether or not standard metadata should be attached to documents in order to enable retention, access control, and e-discovery.
- 3. Access control. Organizations should develop a standardized access control model for determining the levels of access that various users have within and across SharePoint sites. This is particularly important for the search feature. If a goal of SharePoint is greater information sharing, should users have the ability to search for information within sites that they do not have direct access to? These and other decisions are critical.
- 4. System of Record. Organizations should determine whether they want to use SharePoint as an official repository for records and information, or only as a location for collaboration.
- 5. Migration. Moving to SharePoint provides an opportunity to clean up and organize content. Organizations should determine whether they want to take advantage of this opportunity and require classification and disposition activities as part of the migration.

Further Action

In addition to developing a baseline set of SharePoint governance targets, there are two additional key questions that organization must ask about SharePoint if they are seeking to use the platform to meet their IG requirements.

Can your requirements be met with SharePoint alone? Some organizations - such as those in life sciences, energy, and financial services - have complex and multi-faceted IG requirements that may be challenging to meet with SharePoint alone. Fortunately, there are many ways to integrate the SharePoint platform with robust enterprise content management solutions. This approach can help organizations leverage the strengths of each platform.

Do you have the right corporate governance structure? Many organizations struggle with SharePoint governance because they do not have an adequate corporate governance structure. As such, SharePoint governance often becomes a battle between IT - which is under pressure to get the solution rolled out - and an IG organization that introduces friction into this process by requiring governance controls. Senior management needs to lead on this issue by delegating authority to create and implement SharePoint governance.

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Information Governance & Records Management: Understanding the Difference

Barclay T. Blair, President

Making Sense of IG

The ViaLumina Executive Brief series on Information Governance provides business leaders with a grounding in the fundamentals of IG and how it should affect business, legal, and IT strategy.

As we have discussed throughout this Executive Brief series, there is no widely-accepted definition of Information Governance (IG). However, there is broad agreement that the concepts of IG and Records and Information Management (RIM) are closely related. So closely related, in fact, that some use the terms almost interchangeably. However, IG and RIM are distinct concepts, and when building an IG program, it is critical to understand the distinction between the two disciplines.

- be effective.
- focus on.

Fundamentally, IG is a new approach for managing information. It is a strategic model built upon various existing disciplines. Because IG is evolutionary in nature, it requires organizations to make legitimate changes with the goal of maximizing the value of information while minimizing its inherent risks and costs.

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The tension between these two needs - keeping SharePoint attractive for employees to adopt and use, while exercising enterprise control, defines the SharePoint governance challenge.

• Depth. IG is an umbrella concept that incorporates RIM. In other words, RIM is one of the activities that should be part of an IG program. There are many others, including information security, search, data loss prevention, privacy, and business continuity, for example. An IG program should drive the broadest strategy for managing, protecting, and governing information.

• All information. RIM traditionally focuses on "unstructured" content (such as office documents), whereas IG needs to focus on all types of information - including structured data (i.e., data in databases). In addition, RIM is primarily focused on managing a particular class of information - business records. In addition, some disciplines related to IG, such as "Master Data Management," are primarily focused on structured data. IG programs must focus on all types of information in order to

• Broader criteria. IG must address the full range of controls that an organizations wants to exert over information - and not just records retention. This means that previously separate activities - like retention and information security - need to be linked in a new way in order to support true IG. The criteria that drive RIM, such as records retention requirements, are only one set of many that IG programs should

• Exerting control. Whereas traditional RIM often focuses on moving a particular class of information (i.e., records) to a special place in order to manage them, IG must focus on trying to mange content in a way that minimizes the impact on the enterprise and the employee. This may mean managing it in place, using automatic classification, or using other technologies that work in the background.

Taking Action

Understanding the difference between IG and RIM is not merely an academic exercise. Rather, understanding this difference helps organizations plan and execute IG in a practical way. IG is a useful concept that helps organizations recognize and harness the overlap between disciplines that are conceptually related, but functionally separate. For example, even though they are all part of IG, most organizations have entirely separate departments and technologies for applying retention, privacy, information security, knowledge management, and other classifications and controls to information.

Building an IG program does not necessarily mean that these disciplines must all become part of the a single, operational IG unit. That may work for some organizations, but it certainly is not practical nor useful for all. In any case, organizations with existing RIM programs must consider how best to incorporate RIM into an over-arching IG program. Some additional ideas are provided below.

- 1. Evaluate current programs. Evaluate your current RIM program to determine how it should evolve. Should it be incorporated into an umbrella "IG" organization? Is your RIM program still reporting to facilities? If so, then you do not have a RIM program, you have a paper moving program that will not support the broader goals of RIM or IG.
- 2. Harmonize definitions. There may already be groups in your organization who are using the term "Information Governance" to describe their activities. But, what are they really doing? Is it really just records management? Is it really just database management? Take control of the way these terms are used in your organization. Even limited efforts like creating a charter for IG activities at your organization can make a big difference in aligning activities across the enterprise.
- 3. Smart technology. Look for comprehensive tools and applications that can enable you to apply multiple governance controls (i.e., retention, privacy, knowledge management) in a single environment. Simplify.
- 4. Projects and program. Create both project-focused and permanent crossfunctional groups (Legal, IT, RIM, business, compliance, audit, enterprise architecture, etc.) to address your organization's IG challenges. "Doing" IG is not about changing the name of your RIM program to "IG." Without broader changes, this is a bad idea, and will have little useful effect.
- 5. Be practical. Every organization is different. Consider external forces and trends (regulatory, economic, global) and internal drivers (company size, capabilities, culture) specific to your organization to determine a starting point for your IG model.

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Justifying Investments in Information Governance

Barclay T. Blair, President

The Cost of Not Evolving

The ViaLumina Executive Brief series on Information Governance provides business leaders with a grounding in the fundamentals of IG and how it should affect business, legal, and IT strategy.

Information Governance (IG) is an evolution of records management practices. The growth in electronic discovery and innovation in search and indexing of records has created the capability for the governance of information, not mere custodianship. The ultimate purpose of IG is to help organizations maximize the value of information while minimizing its risks and costs.

low

- costs. IG lightens this load.
- thus adding to the cost of litigation.
- information.
- energy and capital.

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Simply changing the name of your RIM function to "Information Governance" is not the same thing as "doing" IG.

Failing to invest in IG has a clear cost. Some of the sources of this cost are outlined be-

 Storage management costs. Storage is cheap, but the fully-loaded cost of managing a piece of information throughout its lifecycle is not. According to International Data Corporation, the total cost of storage ownership "far outweighs the initial purchase price" of the hardware, and includes factors such as migration, outage, performance, information governance, environmental, data protection, maintenance, and staff

• E-discovery costs. Today, organizations can expect to spend millions of dollars finding, processing, and producing responsive digital information in the course of a major lawsuit. One out of five large organizations spends more than \$10 million each year on litigation (excluding settlements and judgments). The cost of e-discovery rises dramatically in proportion to the volume of unnecessary, outdated, and irrelevant information in your organization. Higher costs for finding, reviewing, and producing information are inevitable, as are legal risks associated with unmanaged content. In addition, an unmanaged information environment makes it more difficult to conduct early case assessment and to develop optimum case strategies -

• **Opportunity costs.** IG provides opportunity to do much more with the data you already have-the ability to upsell your customers on related products and services, to provide better customer service and reduce wait time in giving customers their

• IT environment costs. Failing to invest in IG typically means that it is much more difficult and expensive to migrate to newer and better technology. Many organizations struggle with migration and upgrades because their information environment is a mess. Without a "map" clearly showing the business purpose and value of information, it is difficult to make good decisions about where to focus

 Risk management. Without a smart approach to IG, many organizations chaotically run from one "hot button" risk to the next, without understanding which risk justifies the most attention and money. IG program enable organizations to pragmatically



IG provides benefits both to

the bottom line (by reducing

costs) and to the top line (by

providing opportunities to

increase revenue).

address risk in a way that increases value and decreases cost.

· Productivity. Study after study shows that most knowledge workers feel overwhelmed by the amount of information they have to deal with. One study found that "sheer overload" is the biggest problem with email as a business tool. Another says that most professionals spent way too much time looking for information and feel they could not handle any "increases in information flow." Yet another study claims that companies in the US lose \$900 billion each year worth of employee productivity due to information overload.

Taking Action

Building a plan for investing in IG will necessarily be a cross-functional effort. Many other functions view records management, IG and information technology generally as cost centers. They're correct-but it is easy to demonstrate that the costs of inaction on IG exceed the cost of maintaining the status quo. Developing an incremental comparison of costs is useful. Some areas to focus on are outlined below. :

Litigation

Uncover the current and anticipated costs of preparation for litigation, including search, production, and professional fees, with your current system of records management so you can subtract the forecasted cost of preparation using IG.

Factor in the cost savings of early case assessment. IG will enable this to be done quicker because of the access to data it provides. Review law firm bills for document review and related activities - IG can help to drive down these costs.

Information Management

Develop estimates as to how much of the stored records in your current system are either irrelevant for any business purpose, duplicates, or outdated. Consider physical space—whether warehouses for paper records or the fully loaded cost of cooling, floor spaces, and infrastructure required to keep servers running.

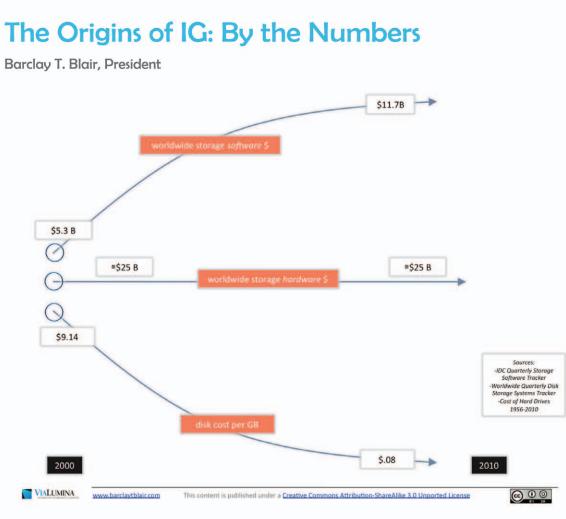
IG's evaluation of records should allow for rational retention policies based on relevance, age and topic, likely reducing your investment in storage. The CIO is a likely source of this information, as well as forecasted increases in data to be stored and new types of data tracked. Also consider labor and redundancies in data custodians. IG will seek to centralize this, allowing easier management and a more skilled and focused custodian staff.

Sales and Marketing

Having buy-in from this function early on will be very helpful; if sales is interested in having more accurate information about customers to support upselling and valueadding offers. Investing in IG can drive clear benefits in this area as well.

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The Numbers Behind IG

This graphic illustrates the IG problem. Let's start on the bottom tine of the trident in this graphic, which shows us that the cost of raw hard disk space is about 100 times less now that what it was 10 years ago (it costs less than 1% what it did ten years ago). Dramatic, but obvious to anyone who has purchased a computer in the last decade.

Now, look at the middle tine - it shows us that the money we spend on enterprise storage equipment has remained relatively unchanged over those same ten years. At first, this doesn't seem all that dramatic. In fact, when I first show this to people, they are surprised that the enterprise storage hardware numbers haven't gone up dramatically. The reality is that the numbers fluctuate significantly with economic conditions-like any commodity. The other factor is that we are starting the comparison near the peak of an unprecedented boom in IT spending (i.e., the dot com years). However, this misses the larger point, which is quite startling:

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we are spending as much on storage 10 years later, when the price of the raw materials - disk drives - has dropped to 1% of what it was.

Let's put this in perspective with an analogy. The average American drives 12,000 miles each year. At a rate of 30 mpg, that means he/she uses 400 gallons of fuel, at current prices of \$3.00 per gallon. As such, he/she spends \$1200 each year on gas. Now, if the price of gas dropped the equivalent of the price of hard drives - from \$3.00 per gallon to 3 cents per gallon, for that same \$1200, he/she could drive 1.2 million miles per year, not 12,000. And that is exactly what we have been doing with digital information, as the cost of hard drives has dropped 100 times, we have continued to spend the same amount of money even though the cost is less than 1% of what it was. Clearly, we are "driving" more.

The third tine at the top of the graphic shows a natural consequence of this - the market for software to manage all this data is growing dramatically – more than doubling in the same decade. This tracks well to the growth in interest and investment in information governance. Managing all this information is no longer a storage problem - it's about how well we can manage, harness, and govern that information.

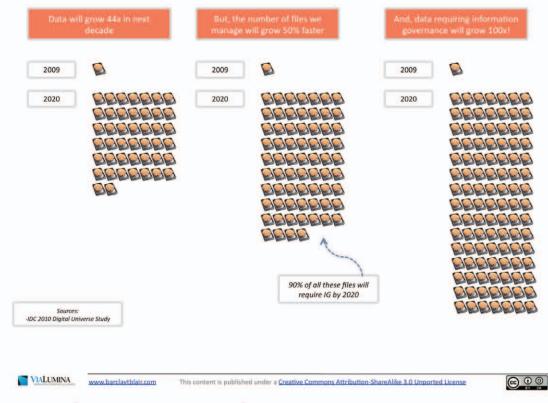
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The IG Problem is Growing Faster than the Data Problem

Barclay T. Blair, President



But, What Does Data Growth Mean?

We have all seen the studies that attempt to quantify the amount of information on the planet. The first one that I was aware of (and used extensively in my first book, Information Nation) was the "How Much Information" study done at University of California Berkeley in 2000. The latest one I know of is an IDC study published in May 2010. I dig into the numbers behind this study in in this week's PowerPoint slide.

There are three "stacks" in this slide, each representing a different dimension of the study, with the relevance to information governance increasing from left to right. Let's start with the first stack.

Stack #1

The first stack shows the expected overall growth of digital information on the planet between 2009 and 2020. The study projects that this will grow by 44 times, from .8 Zetabytes to 35 Zetabytes (1 Zetabyte = 1

Information Governance

trillion Gigabytes). Although I find the scale of these numbers impressive, and intellectually know that this is an incredible amount of information, the numbers are almost too big to be meaningful. Even attempts to analogize these numbers, like "a stack of books from here to the moon," don't really help me. Perhaps this could form the basis of a successful Zen Buddhist Koan - "a story, dialogue, question, or statement, the meaning of which cannot be understood by rational thinking but may be accessible through intuition." (Wikipedia) What is the sound of one hand clapping? How big is a Zetabyte?

Stack #2

However, moving to the middle stack of hard drives, we get to some numbers that mean something to me. According to the study, the number of individual files or "containers" of data will grow at a faster rate than the overall raw volume of data. In fact, it will grow by 67 times in the same period, or almost 50% more than the overall volume.

Aha, now we are getting somewhere. The problems of unstructured data (or at least, "not well structured" data) is at the core of the information governance problem. All of my clients have the same three problems at or near the top of their problem list: 1) Email 2) Unstructured files in shared drives and C drives, and 3) Backup tapes. According to this study, these kinds of problems are going to get at least 67 times worse over the next decade. Now, in the fog of all this data growth, the information governance problem really starts to take shape.

Stack #3

The final stack, on the right, takes us even further in understanding how the information governance problem is growing faster than the problem of data volume itself. As we complete the transition from paper to digital, the kinds of data we are creating and the kind of management it requires is changing. According to the study, the amount of data requiring some type of information governance (i.e, for "privacy, compliance, custodial protection, confidentiality, or absolute lock down" purposes) by 2020 will nearly double. Moreover, the portion requiring the highest levels of information governance control will grow 100 times. Furthermore, when viewed from a files - rather than an absolute volume perspective - the number of files requiring some kind of information governance will be over 90%.

This is the heart of the information governance problem: not only is overall data volume growing at an astonishing rate, but the number of individual piece of data we have to manage is growing at a faster rate, and the amount of data that we have to manage and control in a special way is growing even faster.

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The Hard Drive in the Haystack

Barclay T. Blair, President



Information Management is Broken

This graphic explores the simple but powerful statistic that, for every 1044 pages of evidence preserved, captured, copied, collated, reviewed and handled in e-discovery, only 1 is actually produced. What does this metric tell us? Well, certainly it tells us that there are ... ahem ... some problems with e-discovery. But of greater interest is that it shows how profoundly we are failing at information governance. After all, if all of this stuff didn't exist in the first place, we wouldn't be spending millions of unnecessary dollars to handle this junk in the first place. How much of this content is duplicate or near-duplicate? How much of it could have been - and should have been - thrown away years before litigation commenced?On the first question, some estimate that the amount of duplicate information in the known digital universe is 75% (IDC). On the latter question, when we assess our client's information environment, it is not uncommon to find that over 50% of all content they have in storage is past its due date, and should have been - according to the client's own policies - tossed long ago.

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ECM 2.0A Web that Knows You

Discover it today!

We've included Chapter 3: Compliance and Information Governance on the pages that follow. To download your copy of the book www.opentext.com/ECMBookDownload. For an immersive experience get the free Cloud App from iTunes.

Managing Content in the Cloud Enterprise Content Management 2.0

Tom Jenkins

CHAPTER 3



Compliance and Information Governance is delivered across all of the departments within an ECM driven organization.

This chapter outlines how ECM solutions are helping many of the world's leading companies address compliance and information governance issues. Featured innovator stories demonstrate how businesses across all industries are using ECM solutions to minimize risk, achieve compliance and optimize operations.

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	Enterprise Library	

Figure 3.1: Compliance and Information Governance

CHAPTER 3



Organizations are increasingly relying on innovative content management solutions to mitigate risk, make information transparent and collect, refine and distribute best practices. Enterprise content management delivers effective solutions for compliance and information governance, enabling organizations to control information across disparate sources and applications in the enterprise ecosystem.

Compliance Defined

Regardless of industry, regulation, country, or even voluntary regulations like the ISO series, organizations face a number of risks and overlapping requirements that impact almost every aspect of the business. Finding a regulatory best practice "key" that will leverage the balance between efficiency and effectiveness for a company is crucial to enable active compliance across the enterprise.

There are greater benefits associated with compliancy beyond mitigating risks and avoiding penalties. Regulations are based on demands that inherently describe optimal business operations; by practicing "active compliance", organizations are ensuring that their businesses adhere to industry-established best practices and procedures.



CHAPTER 3 COMPLIANCE AND INFORMATION GOVERNANCE

Organizations are under increasing levels of scrutiny. In every industry and in all countries, countless government regulations, industry standards and company procedures exist. How a company manages both its operations and its information has a direct impact on shareholder value. At the risk of losing shareholders, customers and bottom-line profits, organizations must do what they can to manage their intellectual assets and minimize risk.

Poor management and non-compliance can lead to lost business, financial penalties and even criminal charges. In some industries, failing an auditor's inspection can lead to a company being closed down until corrective action is taken. Corporations across the globe are striving to learn from the enormous regulatory failures of companies such as Enron, along with Lehman Brothers, Bear Stearns and AIG in the recent global economic crisis.

Regulations such as the SEC's passage of the mandatory XBRL filing requirements, the Sarbanes-Oxley (SOX) Act, the Data Protection Act and its equivalent European Directive, and amendments made to the Federal Rules of Civil Procedure (FRCP) have driven requirements for organizations to maintain strict control over their data to protect against liability and comply with regulations to ensure business continuity.

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Figure 3.2: Global Regulatory Pressures

> Central Vermont Public Service

Central Vermont Public Service (CVPS) is an independent, investor-owned company that provides energy and energy-related services to 157,000 customers across Vermont. As the largest of the 21 utilities within the state, CVPS has its share of content management opportunities.

"As a high performance company we need to ensure that the right information is in the right place at the right time so we can make the right decision. To do this we have to incorporate compliance mandates, overcome information organization challenges, and constantly improve business processes. Additionally, there are regulations from multiple authorities that mandate how long we need to keep information," says Chuck Piotrowski, Corporate Records Manager for CVPS. "ECM enables us to maintain a good balance between compliance and business need."

Their ECM environment allows them to manage much of their information in one convenient and secure location. They have access to all of their structured and unstructured content, no matter which format it is in - email, spreadsheets, Word documents, PDFs, etc. Using ECM, CVPS is able to meet compliance regulations and manage its operations in a more transparent and efficient manner by ensuring that all content is safe, searchable, and readily accessible - regardless of the application software.

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Figure 3.3: Records Management and Archiving Options at CVPS

www.opentext.com/ecmbook/innovator/cvps

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CVPS

CHAPTER 3

business conduct.¹

information.

ECM platforms play a key role in allowing organizations to comply in a cost-effective and efficient manner. An ECM solution ensures smooth operations, proper delegation of authority and acceptance of risk. ECM can help overcome the inertia of "silos"organizational, functional, and process silos - and reduce the challenge of tracking, monitoring, reporting and auditing on overlapping and conflicting regulations. It is not enough to implement policies and procedures. To reduce error and control costs, organizations need to have a framework in place to help manage these processes and controls, inform all employees about the necessity of implementing ECM, while meeting reporting and auditing demands.

¹ Crump, James. "Passive vs. active compliance: active compliance mitigates cost, improves business and reduces risk. (Technology Strategies)." Bank Accounting & Finance. 2007

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With active compliance, an organization transforms the burden of compliance into an opportunity to improve the conduct of business. By committing to continuous improvement, visibility, granularity and transparency, an institution assures shareholders that it is focused on their investment and interests. By building a defect-free enterprise... institutions can transform the cost of compliance into an investment. Technologies that automate, standardize, control and optimize business processes provide an opportunity to drive out costs and improve

What lies at the heart of compliance is ensuring that people do the "right things" in a particular way or according to a defined level of performance. Accordingly, compliance prevents people from doing the "wrong things" - either deliberately or by accident. But simply complying is not enough; in today's litigious business environment, organizations must also prove their adherence to rules and regulations. Achieving compliance requires the execution of best practices without error and proving this by providing accurate



Figure 3.4: A Simplified Compliance Model

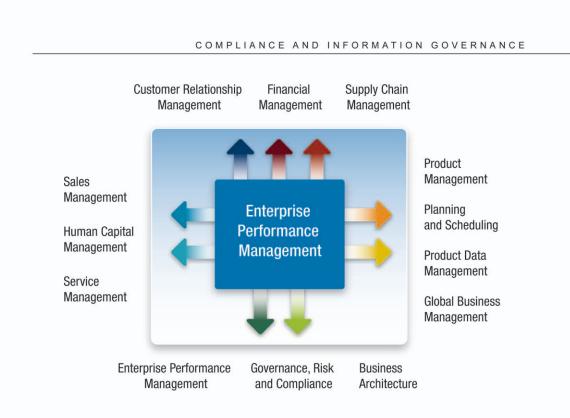


Figure 3.5: ECM Delivers an Integrated Framework for Best Practices

Implementing a Compliance Strategy

As diverse as the various local, national, or global regulations are, they all share common elements:

- Governance structure .
- Assured, audited, appropriate delivery of all guidance
- · Training records, both as proof of delivered guidance and an inventory of defined skills and competences
- Means to measure ongoing compliance effectiveness and exception handling
- Internal audits and accompanying CAPA (Corrective And Preventive Action) mechanisms
- Records keeping •
- Process management tools to improve efficiency and minimize error
- Reporting on compliance processes

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CHAPTER 3

ECM as a Platform for Compliance

compliance.

Information Governance Defined

Historically, ECM has provided a proven platform for enabling compliance initiatives across many industries, including financial services, pharmaceutical and life sciences, and energy and utilities. However, such initiatives are often very specific to a given industry, with stringent regulations governing an organization's policies and practices.

In recent years, the need for corporate compliance concerning electronic information has evolved in the wake of numerous legal disputes where content served as the evidentiary centerpiece in highly publicized trials. Approaching information management and retention in terms of ensuring regulatory and corporate compliance has become only a single pillar of the overall information governance needs of organizations. More importantly, to minimize legal costs and risks, companies across all industries are compelled to define and enforce policies and practices governing the creation, retention, preservation, identification, review, and production of all electronically stored information. In today's aggressively litigious environment - intensified by the staggering growth of electronic information - it is critical to have a measured and consistent means of managing corporate data.

Information governance is both an emerging and evolving concept, borne out of the traditional archiving market. Fundamentally, information governance is about bringing consistency and scale to the retention, management, and destruction of electronic information. While the basic premise of archiving electronic information forms the backbone of information governance technology, it is the inclusion of many peripheral concepts - like records management, enterprise search and eDiscovery, and business continuity - that truly defines information governance on a grander scale.

Implementing an Information Governance Strategy

Before considering a technology solution, it is crucial for organizations to articulate a longterm information governance strategy. The strategy must be inclusive of every stakeholder in the organization who is charged with, or impacted by, the efficacy of the program. Typically, this mandates involvement from individuals within the IT department, legal depart-

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By bringing together diverse policies, procedures, documents and individuals, it is easy to see how a compliance initiative could be fragmented and hard to manage, monitor and report on. When properly configured, the components of an ECM suite can be implemented to manage all aspects of compliance. ECM delivers a seamless solution which connects procedural guidance with documentation, process execution tools, reporting and audits, integration with ERP systems and the ability to document and prove



NIAID is part of the National Institutes of Health (NIH), which is an agency within the U.S. Department of Health and Human Services and the primary federal agency for conducting and supporting biomedical research. NIAID, the second largest NIH Institute with an annual budget of over \$4.7B, focuses its research on infectious diseases like HIV/AIDS, flu, tuberculosis, and malaria, as well as tropical diseases and a number of other infectious diseases.

NIAID had been experiencing exponential growth of electronic documents that needed to be shared among thousands of staff and contractors worldwide. The agency had been using a solution to facilitate basic content management and collaboration, but needed to find additional ECM capabilities, including sophisticated workflow and advanced document and records management functions.

To address these requirements, NIAID created a unique, integrated ECM strategy to establish synergy between its existing infrastructure and an ECM suite. This integration enabled NIAID to enhance the Institute's storage, management, and collaboration capabilities. NIAID benefited from important efficiency and accuracy improvements as the Institute can now effectively store and share information among its over 1,600 federal staff and many onsite and offsite contractors and grantees across several divisions and many locations. This approach also ensured the Institute's ability to comply with a complex array of government and industry regulations such as the Federal Drug Administration Act, Freedom of Information Act, and Department of Defense (DoD) records management standards.

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Figure 3.6: NIAID's ECM Dashboard

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ment, compliance and records management, as well as business unit. Accordingly, the scope of an information governance initiative is as broad as its purpose is vital.

A steering committee should consider many various aspects of information governance how the company will endeavor to manage its electronically stored information (along with its paper documents and other physical records). When requirements, goals, and measures of success are understood, technology may be evaluated to meet those needs.

ECM as a Platform for Information Governance

Many technologies are positioned as both dedicated solutions and foundational platforms for compliance and information governance initiatives. Organizations are well-served to consider the long-term goals and interrelation between such activities, rather than investing in point solutions that resolve an immediate need, but ultimately incur costs and challenges in the future. ECM provides a sound platform for implementing an information governance strategy.

Security and Privacy

Security is of paramount concern in any organization given rising incidents of information crime, increases in losses of confidential customer information and intellectual property theft. With the growing capacity of digital storage devices, governments and private corporations around the world have been embarrassed by the theft of computers and hard drives, computers left in buses and the accidental loss of flash drives, containing the personal information of thousands of citizens. Credibility built over decades can be destroyed in a few davs.

Many government policy issues today are focused around national security and privacy. In the US, these regulations include the USA PATRIOT Act, the Homeland Security Act and the Health Insurance Portability & Accountability Act (HIPAA). Canada's counterpart is the Personal Information Protection and Electronic Documents Act (PIPEDA). Global equivalents include the Data Protection Act (UK), the EU E-Privacy Directive and Data Protection Directive in Europe.

Security plays an integral role in compliance and information governance, requiring a balance between good management and IT infrastructure. The role ECM plays is critical as an organization's intellectual capital must be protected. For security to be effective, it must address risks, benefits and processes at the enterprise level, to align with corporate strategy, policies and procedures, key stakeholders and required resources. Protecting confidential information is a risk management strategy that should be addressed at the senior management level as an imperative that also helps to effectively optimize business operations.

COMPLIANCE AND INFORMATION GOVERNANCE

While governance is the responsibility of senior executives and the board of directors, it should align with an organization's IT governance framework. Senior executives can incorporate security issues and concerns into execution and their daily operations, while the board of directors can make information security and privacy an intrinsic part of the organization's overall governance framework and processes already in place.

To ensure that all relevant elements of security are addressed, various security standards have been developed to provide guidance. Some of the most commonly used standards include Control Objectives for Information and related Technology (COBIT), ISO/IEC 27000 (part of a growing family of ISO/IEC Information Security Management Systems), the PCI DSS: Payment Card Industry Data Security Standard and others such as FIPS Publication 200 and NIST 800-53 in the US. As organizations are increasingly using services that are outsourced to the Cloud (see Chapter 13), strategies around security have expanded to include data loss prevention (DLP) which are systems that identify, monitor, and protect data to minimize both intentional and unintentional data loss.

A formal strategy around security and privacy can be deployed by creating enterprise standards for security policies. As in the cases of compliance and information governance, key resources and stakeholders need to be identified, empowered and supported; policies must be incorporated into relevant processes; education and training should be provided to all employees; technology infrastructure optimized; and the appropriate solutions implemented to support secure and reliable operations.

ECM Technology Components

Technology plays a critical role when integrated into the proper processes and organizational structure. The following ECM technologies are crucial to helping organizations achieve compliance and support information governance:

- . Archiving
- Retention Management
- **Records Management**
- Search
- **Business Process Management**

Archiving

Archiving is the technology backbone of compliance and information governance. In the past, archiving technologies were deployed to address the storage and IT-related costs concerning electronic information. Historically, archiving enabled electronic documents and data to be offloaded from one system and placed into another. In cases where information was still readily used in day-to-day business, providing continual access to that content through a leading application was preferable.

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INNOVATOR STORY

> UBS

In response to the new compliance requirements posed by Sections 302 and 906 of the Sarbanes-Oxley Act, UBS, one of the world's leading financial institutions, implemented an internal certification process for financial reports, in which senior executives formally certify their financial figures and processes using a 'subconfirmation' process.

During the internal certification process, appropriate persons are notified via email when their input is required, and are then granted personalized access to the relevant documents on the UBS intranet. All relevant processes are archived and tracked in a log file. The CEO and Group Controller - generally the CFO - issue a final certification for the Security Exchange Commission only when all internal processes have been completed.

The UBS corporate governance portal enables the company's business managers worldwide to collaborate in developing internal and external business reports. Relevant departments have access to a complete overview and status of the certification processes at all times. All related processes have been automated and simplified, expediting the certification process.

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Figure 3.7: Certification Processes at UBS

COMPLIANCE AND INFORMATION GOVERNANCE

ECM technologies provide archiving capabilities that interface with many content sources, including email systems, collaboration and document management systems, ERP systems, and locations where information is stored, such as file shares. The administration of an archiving tool enables companies to determine when and how information should be extracted. For instance, email messages may be archived if they are older than 90 days, or larger than 1 MB.

Archiving is perhaps the most under-rated technology in any IT department's arsenal. Its heritage in facilitating long-term and cost-effective storage tends to relegate archiving to storage facilities like filing cabinets and tape warehouses. Archiving information allows organizations to capture electronic information and make it much more accessible in the event of discovery or audit. Content becomes searchable from a single system of record and eases the cost and effort associated with litigation. Archiving delivers the basis for ensuring suitable retention of information and is explained in more detail in Chapters 5 and 6.

Retention Management

Many compliance and information governance initiatives, while grounded in the practice of archiving, are underscored by retention management. Retention management ensures that information is not retained indefinitely, and that a general "lifecycle" can be attached to all content. It is typically characterized by the application of a retention policy to an object - be it a document, an email, an instant message conversation, or otherwise - and the subsequent enforcement of that policy. Generally, a retention policy will dictate how long to keep an object and what to do when that duration has elapsed. Given the sheer volume of information at hand, retention management is typically handled across a broad set of information. Retention control may be based on criteria such as a user's group membership or geographic location – for instance, retaining emails within an IT department for 3 years.

Records Management (RM)

With the daily pressures to comply with regulations, changes to legislation, and the pace of today's global market, being able to manage the lifecycle of content by applying a Records Management discipline is a business-critical capability. When content such as emails, documents, and paper files are classified as business records and managed from creation to deletion, organizations need to assure compliance with information governance requirements. A corporate RM program ensures a consistent record policy and practice that spans all electronically stored information and physical information. These policies are applied to all content according to their business value to an organization.

Search

Although the technologies outlined above help organizations to comply with standards and regulations, they do not prevent litigation or audits. FOIA legislation can force organizations to produce information within very short periods of time. Search technology as part of an

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integrated ECM solution can help auditors or legal staff locate relevant information. An RM system can be used to group this information into a consolidated list, where "holds" can be applied to suspend the information's lifecycle. Holds can be applied to entire categories of information using classifications and taxonomies. A workflow is then implemented to automate the review of all collected information. On completion of the review, export and packaging capabilities allow the information to be produced for delivery to the requesting party.

Business Process Management

Once guidelines around compliance and governance have been communicated, an organization needs to give employees the support they require to implement the defined processes. Business Process Management (BPM) delivers an effective process engine - initiating processes, defining and distributing tasks, recording their completion, and reporting on the outcomes of a given process. A BPM system with a supporting best practices repository not only helps to support compliance and governance; it enables best practices to be followed and documented. BPM is covered in Chapter 11.

Compliance and Information Governance Applications

eDiscovery

With volumes of corporate data increasing in size and complexity, the process of eDiscovery - exploring, collecting, preserving, and processing information - has become a tremendous challenge for enterprises. The ability to assess relevant information where it resides using one central solution, is key to mitigating the risks and costs associated with eDiscovery.

Litigation readiness reduces risks associated with the volume, organization and legal hold of information. It can prevent significant and unplanned costs. A litigation readiness solution is achieved through a comprehensive records, retention, disposition and legal hold management strategy, built using key ECM components that address content lifecycle management, records management, and email management. This is illustrated in the Electronic Discovery Reference Model (EDRM) below, which allocates the eDiscovery process into steps or that can be effectively managed.

> Office of the Superintendent of Financial Institutions



The Office of the Superintendent of Financial Institutions (OSFI), the regulator of federally registered financial institutions operating in Canada, needed to implement a system to streamline, standardize and re-design internal processes and improve the management of information across the organization in response to a government legislation, which specifies that certain types of cases are automatically "deemed approved" if OSFI does not render a decision within 30 days.

OSFI deployed ECM technology to create a central repository for managing unstructured content, as well as process workflows and collaborative workspaces. Currently, OSFI's Case Management System makes it easy for case officers and other expert reviewers to find and share case information, ensuring everyone is spending more time focusing on higher-value areas that require their expertise and judgement.

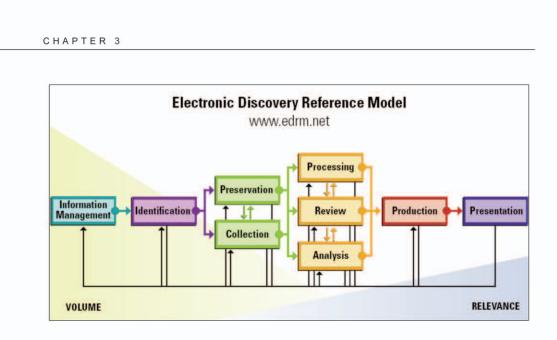
In addition, OSFI's Business Systems Integration Initiative (BSII) provides a new level of automation, so that OSFI employees can quickly and efficiently manage regulatory processes, improve risk management supervision and speed responses to key stakeholders.

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Figure 3.8: OSFI's Case Management

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The U.S. Federal Rules of Civil Procedure (FRCP) has implications for an organization's data retention policies. Following revisions to the FRCP and some more recent historic court decisions, companies have begun to take two significant steps toward reducing the costs and mitigating the risks of eDiscovery: establishing and implementing records management within ECM systems and policies, and creating internal eDiscovery teams to manage portions of the process in-house. By developing sound, repeatable processes and working with Litigation Support applications, organizations are lowering both the risks and costs that are associated with eDiscovery.

Pharmaceutical: Clinical Trials

ECM provides the infrastructure, knowledge management and real-time collaborative workspaces that pharmaceutical employees need to share, manage and analyze clinical trial data throughout the clinical trial process. ECM helps to reduce costs and improve guality by providing instant access to CRFs, SAEs, gueries, patient diaries and inventory reports. By providing a secure extranet environment where researchers can work together, ECM extends an organization's ability to manage and share clinical data with partnering companies, such as Contract Research Organizations (CROs) and sponsor companies.

Figure 3.9: The Electronic Discovery Reference Model (EDRM) ©Socha Consulting LLC and Gelbmann & Associates

COMPLIANCE AND INFORMATION GOVERNANCE

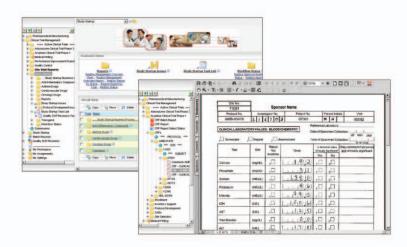


Figure 3.10: Clinical Trials Application

Energy: Change Management

In organizations that process hazardous materials, it is critical to comply with safety and environmental regulations and manage change within their facilities. Management of Change (MOC) is one of the more difficult processes in a plant in terms of downtime, outages, resources, and risks regarding exposure to fines, lawsuits and negative publicity. These risks increase as activities and man-hours increase and generations of knowledgeable employees retire.

An ECM solution helps manage a compliant and documented process for facility change to reduce risk, increase efficiency, safety and reliability, and minimize environmental impact. Through document management and business process automation, it manages all the stages of a MOC lifecycle and related processes and documents, from single-screen initiation to final records management.

Manufacturing: Quality Management

For regulated industries like manufacturing, an organization's quality management system is critical, both for regulatory compliance and for continuous improvement initiatives. Expanding manufacturing companies face the challenge of adjusting to and managing periods of rapid growth. The need to adopt new business practices capable of meeting the demands of large organizations must be reconciled with regulatory requirements that mandate adherence to established procedures and the generation of documentation that proves this adherence. ECM gives manufacturing organizations (including pharmaceutical, medical device, biotechnology, and diagnostic companies) a flexible and expandable solution to manage quality issues and initiatives.

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CHAPTER 3



Compliance, Governance and Emerging Technologies

As connectivity improves, bandwidth increases, and devices such as smartphones become more powerful, organizations will be expected to control the flow of information in any format across the enterprise. This includes emerging technologies such as Web 2.0 collaboration tools like wikis, blogs and social networking. As discussed in Chapter 9, these applications are popular because they are accessible and easy to use. The problem this presents for the enterprise is that users are able to set up and use these collaborative tools without the knowledge of a company's IT department or legal counsel.

When content generated using Web 2.0 technologies is hosted outside an organization's IT infrastructure, the threat of exposure of confidential information intensifies. During litigation, for example, an organization must present any materials that might be relevant to a case. eDiscovery requires that legal and IT departments work together to search data stores for relevant content - from file systems and hard drives to Internet services and mobile devices.

Challenges around compliance and governance will increase as digital content grows and people continue to use social software to create and share information. In the public domain, there are obvious data and privacy protection issues, along with security breaches and potential for reputation damage. How do government regulations HIPAA, PIPEDA and the Stored Wire and Electronic Communications Act or industry regulations like EUB and Sarbanes-Oxley impact social media? Is it realistic for organizations to enforce corporate policy outside the work environment?

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Figure 3.11: A Comprehensive Quality Management Solution

COMPLIANCE AND INFORMATION GOVERNANCE

As the enterprise struggles to balance risk mitigation with individual creativity and productivity gains from Web 2.0 technologies, social media policies must be clearly outlined and communicated so the compliance process itself does not become a source of risk. Inside the firewall, these risks can be mitigated by a fully integrated and secure ECM platform that supports full content storage, archiving, lifecycle and records management functionality.

ECM 2.0: Bringing It All Together

All companies face the difficult challenge of maintaining performance while operating in an increasingly risky and regulated environment. The key to successful compliance with high information governance standards is to ensure that consistent processes are deployed throughout an organization, critical information is managed, and people are fully trained and able to work together within the compliance framework.

A centralized and secure repository, along with content lifecycle, archiving and records management, and search functionality, enables organizations to track and store the necessary evidence to show that their policies, procedures, and processes are being followed - regardless of whether this information is being exchanged via an instant messaging system, a mobile device or via email. With ECM as an infrastructural backbone, organizations can begin to enforce and monitor comprehensive policies for all information sources within the enterprise.

ECM has a proven history for implementing compliant records, document and process management solutions for ISO 9000, the U.S. Patriot Act, SEC, OSHA and the FRCP Act in the U.S. ECM reduces the risks associated with non-compliance by making information governance processes more efficient and transparent. In the chapters that follow, we'll take a closer look at all of the technologies inherent to effective ECM. The concluding section of the book brings all the technologies together and discusses the implementation of an ECM solution in more detail.

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Summary

Is Information Governance really as simple as thoughtfully managing the creation, the on-going use, the storage, and the eventual destruction of information?

In the end, it really is. Complexity is only introduced when we consider that every piece of information that we create has risk, cost and value. When it comes to managing that piece of information, it seems that every action we take follows Newton's Third Law. Decrease the risk - increase the cost. Increase collaboration decrease security. Quotas on mailboxes - lead to personal archiving. When it comes to risk, cost and productivity, every action does seem to have an equal and opposite reaction.

Information Governance is about finding balance. The reality of today's organizations mean that we are regularly called upon to balance opposing initiatives. Whether it be the security of information vs accessibility, tagging metadata vs the burden put on end users, or ensuring compliance vs allowing agility, we deal with issues that can significantly impact the organization. The art and the science of Information Governance is finding balance among competing priorities, even when different parts of your organization have very different priorities when it comes to information.

How do we reach a compromise when the Legal Department sees information as mainly a risk, when IT sees information as mainly a cost, and end users only see value in information? The answer is always the same, bring people together to share their competing priorities to reach a consensus on the policies and practices that make sense for our organization. Once that framework has been developed, then we can turn to technology to make it happen. It is possible to collaborate in a secure environment. It is possible to reduce mailbox sizes without having users create personal archives. It is possible to reduce litigation risks and cost through the defensible deletion of information.

We hope this book sheds some light on some of the issues faced by organizations in this era of expanding regulatory requirements, exponential growth of electronically stored content and of course, eDiscovery. We also hope that the book offers some ideas and best practices that can become part of your Information Governance initiative. We believe the best advice we can provide is that, as you begin your Information Governance initiative to address risk, productivity and cost - balance matters.

Resources

ViaLumina

Essays in Information Governance. a blog by Barclay T. Blair

www.barclaytblair.com

OpenText Information Governance www.opentext.com/inform

Managing Content in the Cloud www.opentext.com/ ECMBookDownload

balance matters RISK-PRODUCTIVITY-COST

Information Governance (IG) is a new approach to managing information. It builds upon and adapts disciplines like records management and retention, archiving, business analytics, and IT governance to create an integrated model for harnessing and controlling enterprise information. The ultimate purpose of IG is to help organizations maximize the value of information while minimizing its risks and costs.

Although IG is built upon a foundation of existing disciplines, it is an evolutionary model that requires organizations to make real changes. Ingrained habits must be broken (e.g., information hoarding, treating information as a personal vs. corporate asset); new corporate governance structures built (e.g., real C-level accountability); and new technologies implemented and outdated IT practices curbed (e.g., using backup tape as archives).

This Executive Briefing Book is designed to quickly provide senior managers with an introduction to the key concepts of IG and how it can provide value to their organizations.



