

A Consultant's View: The Principles as Diagnostic Tools

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Alison North is a United Kingdom-based management consultant focused on developing information governance strategies that minimize an organization's risks while aligning with its vision, business strategy, and budget.

A consultant for more than 25 years (see sidebar "Alison North: A Career Overview"), North's use of the Generally Accepted Recordkeeping Principles (the Principles) began in 2011. Prior to that, she had reviewed the Principles and considered that they would be a great tool in her information governance toolkit.

North notes, "The Principles and the Information Governance Maturity Model (IGMM) complement my own methods and provide a framework, backed by a professional body. They provide additional credibility to the results I deliver to my clients. I had dabbled with my own maturity model over a number of years, but felt that the ARMA Principles and the IGMM brought a North American flavor to my consultancy. As the majority of my clients are global with offices in the U.S. and Canada, this was an important consideration."

Flexibility Is Key

As noted in their Preamble, the Principles are both general and flexible. (See sidebar "Preamble to the Principles" on page 40). North's work exemplifies how the Principles and the IGMM are broad enough to encompass many kinds of industries and how they can be flexibly adapted to various information governance challenges. But to understand North's use of these

tools, it is necessary to understand the scope and nature of her consulting work, much of which is risk- and information-related, but at the business level rather than at the records management level.

"Rarely is my work proactive," says North. "A client doesn't call up and say 'I'd like to mitigate my safety risks by developing an information governance program.' More likely I am asked to review an organization's information governance because a problem has occurred and the company is vulnerable. I react in a proactive manner. By that, I mean I don't take the problem at face value. I look for the root of the problem before I try to solve anything."

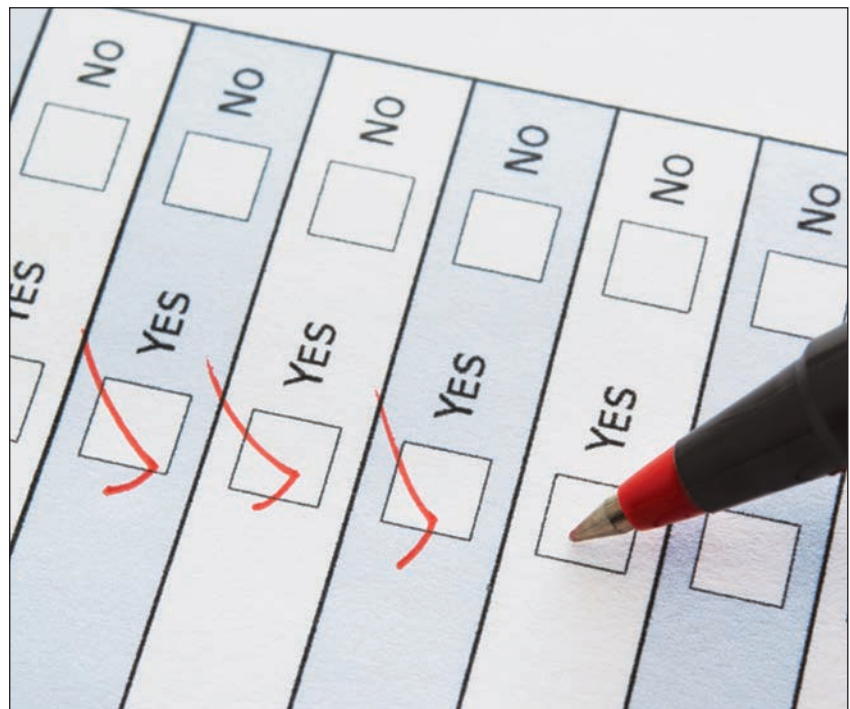
North's approach is to start at the top to gain a broad understanding of

the business, its vision, its financial status, its reason for being. She seeks to know what drives the organization's governing board to make decisions and must understand the firm's culture, its internal politics, its challenges and future information needs.

"Websites and annual reports reveal quite a lot and are a good place to start," says North, "but current and more specific details need to be gathered from within."

Gathering First Impressions

North gathers a great deal of company information before beginning the project, and she evaluates the people, processes, and technology that are involved in finding and providing the requested background information. She



uses the Principles and the IGMM to assess this experience as a start in learning how the organization handles its information.

For example, North considers these Principles-related questions:

- Was the requested information readily available? (Availability)
- Was it protected? (Protection)
- Was she required to sign a confidentiality agreement? (Protection)
- Was it up to date? (Integrity)
- Who was responsible for the information? (Accountability)
- Was it regulated information? (Compliance)

This early picture of the organization's information handling is only a sketch, and much more is needed to understand the perceived problem and determine what kind of information governance solution the client may need.

Other information to be gathered depends on the type of organization and the specifics of the problem under consideration, but it likely includes interviews with policy makers, process owners, senior managers and board members, and the information technology, legal, and human resources functions. Other work involves review of relevant policies, procedures, laws and regulations, and any standards that exist for the client's industry.

North also identifies stakeholders, both inside and outside of the organization, with particular attention to key supporters of the information governance program and the internal leaders who influence and make change happen. Outside forces, such as the economy, national politics, and cultural and language differences in the countries where the organization operates also affect the development of the information governance program.

Identifying Risk

After synthesizing and analyzing the client's business, industry, environment, and other factors, North is better able to identify the true prob-

Alison North: A Career Overview

Beginning in the 1970's, North worked as a records manager for a number of oil and gas exploration companies in the United Kingdom, the United States, mainland Europe, and Japan, and she set up the first information centers on production platforms in the North Sea, where she was the first woman to work offshore in those waters.

In 1986, North founded an information consulting firm that designed records management programs for global organizations. She also developed a free, web-based, records retention tool that contained international laws and regulations mapped to record types. After selling the practice in 2011, North founded AN Information Ltd. and became an independent consultant with an initial focus as an expert witness on the San Bruno Pipeline Rupture and Fire Incident for the California Public Utilities Commission.

She is the author of two books on records retention and has received the Information and Records Management Society's Lifetime Achievement Award. She provides information governance training and is a frequent speaker. She is the international director on ARMA International's Board of Directors.

lems and perform risk assessment. Depending on the nature of the consulting engagement, risk assessment may encompass business risks, safety risks, or compliance risks, as well as the risk of events that pose a threat to human life or personal security.

Often, the crucial question is whether the information that the client relies upon is good enough to mitigate these risks and if not, why not. Depending on the situation, key questions may address whether information is traceable, verifiable, and complete.

Evaluating and rating an organization's information handling is never easy, according to North:

Each organization is unique and will fare better or fail in different areas of the IGMM. For example, you would think the principle of availability would be easy to rate – something is either available or not, right? But imagine you have to evaluate a construction

records system that relates to a bridge built 100 years ago. It is entirely likely that the century-old information is still somewhat active and needs to be available in the event of a disaster. Just how easy is it to benchmark availability in those circumstances? There are many different questions to ask in this example, such as how the information is preserved, whether it is electronic, how it is made readable and usable.

The point is to use the Principles in the context of the organization's problem. The diagnosis must fit with the illness, so, for example, if the risk centers in a finance function, compliance with outside securities and accounting laws may be paramount. If the difficulty is with safety, ensuring that the most up-to-date guidance is available, accessible, and followed may be of utmost importance.

North determines the rating to assign to various elements of the

Preamble to the Principles (Excerpt)

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

IGMM based on her considerable experience. In the process, she factors in whether or not it is necessary or essential for the organization to be a Level 5 in some of the Principles.

“Many times it is inconsistency that marks an organization down,” North says. “For example, there may have been policies and procedures in place at various times in the organization’s life, but adherence to them fluctuated.”

The next step is to formulate a

customized solution. North is a firm believer that there is no typical consulting project.

“While there are similarities in issues and somewhat similar results across organizations, no two assignments are identical. One size does not fit all,” she says.

Assessing a Disaster

One major advantage of using the Principles and the IGMM was when the California Public Utilities

Commission asked North to be an expert witness on the San Bruno pipeline rupture incident that occurred in September 2010.

“The Principles provided a framework to deliver the findings in a way that could be understood by management, lawyers, engineers, and records managers alike,” says North.

For this particular assignment, North worked with attorneys and others to investigate how certain deficiencies may have contributed to the disaster. Once the gaps were identified, they were listed on the left side of a grid that contained each of the Principles across the top. (See Figure 1: “Graphic Results of Information Governance Maturity Model Risk Assessment”). Each red square in the chart indicates how the gap or inadequacy posed a risk to the company.

The chart, of course, is supported by an extensive written report documenting the findings and conclusions. To view the full report, go to *www*.

The Principles Assessment Criteria	Accountability	Compliance	Transparency	Availability	Integrity	Protection	Retention	Disposition
Records Management Theme								
Strategy	1.5	1.5	-	-	-	-	-	-
Responsibilities	1.5	1.5	1	1	1	1	1	1
Training	-	1	-	1	-	1	1	1
Policies, Standards, Procedures	1	-	-	2	-	-	-	-
Records Retention Policy	1.5	1	1	1	1	1	2.5	2
Business Continuity & Vital Records	-	1	-	-	1	2.5	-	-
Records Management Processes	1	1	1	1	1	1	1.5	1.5
Records Management Storage	1	1	1	1	1	1	1.5	1.5
Technology	1	1	1	1	1	1	1.5	1.5
Average Maturity Score (1-5)	1.2	1.1	1.0	1.1	1.0	1.2	1.5	1.4

Figure 1: Graphic Results of Information Governance Maturity Model Assessment

epuc.ca.gov/NR/rdonlyres/23513DF5-28CB-425B-BAE4-0151981F0779/0/CPSD_Recordkeeping_OII_Report_Final.PDF. [Editor's note: Because the case is still pending, North is unable to comment directly.]

The ability to deliver results as a series of graphs is one of the chief benefits of the IGMM tool. North notes that the client can easily see that a bank of red squares containing ratings of 1 or 2 clearly indicates that the company is at risk. Furthermore, the ability to summarize the findings in terms of overall maturity levels provides perspective and indicates the areas in which work will be needed to ameliorate future risks.

But she cautions, "Of course the results have to be put into the context of the business so the IGMM grid alone is not enough. The report must also show the people, process, and technology elements that were assessed and whether the current information handling aligns with the business strategy."

Interestingly, records management is often a byproduct of North's work, rather than its primary focus.

"Most of my work involves organizations that do not have records management functions," North says. "Often times, I don't mention records management at all, even though I may use RIM tools and skills as a part of the solution. In the USA, Canada, and Australia, records management is recognized as a profession more so than in Europe and other parts of the world where many organizations don't have records managers. So, I introduce the IGMM as a tool to measure the organization's information handling and deliver a gap analysis. Unfortunately, those who have heard of records management still perceive it as a necessary overhead – something that involves spending but does not deliver a return on investment."

In closing, North notes that information governance projects will identify hot spots and bring about change in processes, staff education, and technology, but realistically, "information belongs in the engine room supporting the delivery of the organization's products and services, assisting with compliance, and providing intelligence to governments and their agencies to protect and keep us safe. The Principles and the IGMM help us to measure the way we handle our information, highlight and correct any problems, and help us mitigate risk in order to be confident enough to rely on that information."

North also contends, "You don't have to follow IGMM to the letter. Map it to your organization and your needs. Be flexible."

Communicating Good Practice

Clearly, flexibility is at the heart of the Principles and IGMM. North's experience shows the international nature of the tools and their successful application in projects that are not necessarily limited to evaluating only records and information management programs. In the right hands, the tools provide a way to show the effect that missing components and poor practices can have on a range of governance issues.

What's more, because the tools are industry standards, they provide an objective platform for assessing current conditions and prescribing future actions, thereby enhancing the credibility of those who use them well. Perhaps most important of all, they provide an understandable way to present findings and recommendations to audiences of varied backgrounds, communicating the message of good information practices to everyone affected by them. **END**

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