

# In Search of an

# **Effective RIM or IG Program**

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oes an effective enterprise records and information management (RIM) or information governance (IG) program really exist?

There are many articles, webinars, educational seminars, and champions professing the need for and benefits of a compliant RIM program – which, as the core of IG, is a prerequisite for an effective IG program. ARMA International even offers a measurement tool based on the Generally Accepted Recordkeeping Principles® that enables RIM and IG professionals to assess the maturity of their organizations' programs so they can identify and foster needed improvements.

Yet, in working with and observing hundreds of RIM and IG programs during more than 40 years of consulting and speaking engagements, this author has never found a single sustainable and compliant enterprise program. Based on this, he contends that there are no functioning, enterprisewide programs that set standards and rules that personnel are required to follow – period!

## The State of RIM Programs

RIM and IG professionals may take exception to the above statement. Many will respond that their organizations have RIM and IG policies and records retention schedules that are available to all employees. Others may argue that they have annual information disposition days where personnel clean up their work areas and dispose of information. Still other program champions may promote their programs as compliant and risk avoidant to their executives or board.

But, if these statements are true, why do so many organizations have:

- Outdated policies and records retention schedules
- Retention schedules that do not reflect the organization's structure or the information it creates, distributes, and retains
- Personnel who know little or nothing about the policies or records retention schedule - or believe they are for those who deal with the paper records in offsite storage and do not affect them
- No continuous education or training on policies and procedures

• No auditing to ensure up-to-date program compliance

Some may argue that these conditions are not representative of most organizations – that most RIM programs are working to the satisfaction of management. But, the on-going demand for experienced RIM and IG professionals/consultants to update policies and retention schedules and to automate RIM processes - from organizations private and public, large and mid-size, and with national and international footprints - refutes that.

Let's look, then, at why so many organizations don't have a compliant and sustainable RIM or IG program.

### Obstacles to Effective RIM and **IG Programs**

Some reasons for poor RIM and IG program implementation and sustainability are:

- Change in management structure and loss of the program champion
- Lack of staff accountability
- Complicated retention guidelines
- Lack of management support for the RIM program manager
- Enterprise content management tools that are not used as enterprise solutions or repositories
- No enterprise taxonomy standardizing terminology, indexing, media, or ownership
- An out-of-sight, out-of-mind men-
- Lack of understanding what a RIM program is
- Humans' inherent resistance to change

## **Resistance to Change Is Major Factor**

The final listed item is the main reason organizations are struggling to implement effective RIM and IG programs. Resistance to change is especially evident in managers who fail to see the benefit in disrupting their staff's work routines with programs they believe contribute little to the financial bottom line.

The result of this resistance to change is clearly demonstrated in the following scenarios, which are mirrored by the majority of companies.

#### No Enforcement, Compliance

A newly hired general counsel (GC) is critical of the organization's out-ofdate, 10-year-old retention schedule. Due to legal holds, the records policy and schedule had been ignored by the previous counsel. Since the new GC wants realistic RIM and IG policies reflecting the company's digital environment, he hires a RIM and IG consultant to update the program.

The consultant collects data, inter-

10 years it will update the policies and retention schedule again and continue operating under the false assumption that staff will voluntarily comply.

#### Partial Deployment

An organization employs hundreds of Microsoft® SharePoint® sites for various departments to use to manage their projects' digital information. With Microsoft continually updating and adding enterprise capabilities to SharePoint, the IT department has the opportunity to turn on standard "content descriptions and record center" functionality.

When asked why IT does not im-

# Focusing on communication, education, and careful technology deployment will help personnel make the changes necessary...

views stakeholders, creates taxonomies, revises policies, and develops a compliant, realistic retention schedule. The consultant's presentation about the new program structure and its associated policies and schedule to the GC and the management team introduces:

- The lifecycle position of managing company information assets at the point of creation with indexing standards and rules
- Tools to assist personnel in processing and retaining their docu-
- Policies for enforcing compliance through audits and performance penalties

Upon the presentation's completion, the GC's immediate response is, "This program proposal will force too much change on the company and its personnel. Just provide a retention schedule that can be issued for the staff to follow."

As a result, this company will have a policy-driven program with "no teeth" to ensure compliance and sustainability – and the prospect that in plement this enterprise functionality to universally manage digital records, IT staff respond, "It creates too much change for the user and will necessitate adding full-time SharePoint administrators."

#### No Compliance Auditing

A large, heavily regulated organization reorganizes and wants to move the RIM program to the facilities department because it is perceived as a warehouse function, simply managing paper documents in offsite storage. A program assessment finds an outdated, department-based retention schedule and RIM policy that the majority of personnel ignore. In fact, the only recollection personnel have of the RIM policy is from their new employee orientation where they were asked to review all company policies and sign an acknowledgement form.

Although the RIM policy clearly states that the schedule is to be used to manage and dispose of paper and electronic records, it is used only to destroy paper records in storage; identifying and disposing of electronic documents from shared drives and e-mail are perceived as too time-consuming and non-productive.

#### Pockets of Compliance

While resistance to change often causes RIM programs to fail at the enterprise level, there are pockets of compliance with RIM and IG policies and RIM procedures in many organizations. Adherence is usually found in individual departments or in locations that are externally audited by ISO or government agencies.

For example, if U.S. Nuclear Regulatory Agency (NRA) auditors retention schedule and that they will suffer consequences if they do; these fears may be causing staff to ignore policies and retain information "just in case" management needs it.

#### Educate Senior Management

Senior management must understand the RIM program's purpose that it is not just about e-discovery or legal holds, but it also drives standards that:

- Enable authorized personnel to access complete and accurate information easily
- Reduce information volumes

# ...fears may be causing staff to ignore policies and retain information "just in case" managment needs it.

cannot access specific documents or if those documents are not appropriately maintained in certain parts of a nuclear energy company, NRA auditors can shut down the power plant, creating a major crisis for the parent company. Yet in the company's administrative office environment, resistance to change is often evidenced by inconsistent application of policy.

## **How to Overcome Resistance** to Change

Focusing on communication, education, and careful technology deployment will help personnel make the changes necessary for implementing and sustaining an effective RIM program.

#### Communicate: from the Top Down

Minimizing resistance starts with communication from the top executive down that constantly and consistently reinforces that compliance with RIM and IG policies and related RIM procedures is mandatory. This will dispel staff fears that management will not accept them destroying information in accordance with the

- Instill confidence in information disposition
- Minimize legal and operational

Senior management also must understand from program conception:

- RIM and IG policies and the retention schedule are corporate standards that are not open to interpretation once approved by the organization's top level of authority, and these standards must be supported at all levels.
- The policies and retention schedule are living documents that must be reviewed and updated annually.
- Implementing the procedures related to the policies and retention schedule will result in changes to how staff process and handle information, from its creation through disposition. The gravity of the change can be diminished by an ongoing resource commitment, including for:
  - An application to assist users in creating, sharing, and storing information assets

- A single repository for final versioning of corporate documents
- Effective staff education and "town hall" meetings where personnel have input into the design of policy-driven standards and rules
- Continuous user assistance
- Audits to test the effectiveness of and compliance with the policies and retention schedule

#### Partner with IT

Introducing technology also often creates resistance to change. An IT department that is eager to respond to users' requests for new applications to make their work environment more efficient may introduce applications without standard rules for their use; deploy applications to meet a specific user or group's requirements, rather than enterprise-wide applications; and leave it to users to set up, index, and control enterprise-wide applications and tools, such as e-mail and shared drives.

These actions allow users to develop bad information-processing habits that affect their compliance with RIM and IG policies and the records retention schedule. It is then necessary to change the users' behavior, and managers may opt to avoid this effort rather than disturb the status quo.

To prevent these bad habits and minimize the need for changing user behavior, RIM must partner with IT to ensure that any new application or document repository is designed to allow conformance to the standards and rules provided in the policies, RIM taxonomy, and retention schedule.

The program standards and rules come first, not the technology.

#### **Elements of Effective Programs**

To have effective, enterprise-wide RIM and IG programs, their scope must include the lifecycle processing of the organization's information assets. This requires:

- IG policies, which are strategic in nature, that conform to management objectives and the organization's culture
- Mandated adherence to RIM and IG policies, in the same way that adherence to other corporate policies is mandated and compliance with them is monitored and en-
- An enterprise application that has policy and retention standards and rules imbedded in its administrative tables and is accessible throughout the organization for users to create, capture, share, distribute, retain, and dispose of digital and physical information
- A retention schedule that is easy to use and has realistic retention values. The day of 100-page retention schedules is over; big bucket categorization is required in this digital world.
- · Annual updates of policies and the retention schedule
- Ongoing user support and education to reduce resistance and help ensure acceptance and compliance with the policies

#### **Sell the RIM Program**

Change is inevitable. The role RIM plays is dependent on management commitment and their understanding of what elements an effective enterprise RIM program comprises.

If RIM and IG professionals can strategically sell these elements, then change can be managed, rather than be a roadblock to the program's success.

The search for a sustainable. effective, enterprise RIM or IG program goes on.... END

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