

Innovative Ideas for **Making IG Happen!**



Five case studies highlight how records and information management professionals recognized and seized opportunities to enlighten their organizations about the power of information governance (IG) by taking innovative and practical actions to link IG to their organizations' bottom line.

Susan Cisco, Ph.D., CRM, FAI, and Sue Trombley, IGP, FAI

The benefits of information governance (IG) are now acknowledged by most industries, and most agree that records and information management (RIM) is *not* a synonym for IG but rather a component of IG, alongside compliance, e-discovery, privacy, and security.

That said, IG program adoption in organizations of all sizes is lagging. The degree to which they embrace IG varies widely; many adopt only components of the IG framework in organizational silos, which undermines their organizations' ability to effectively mitigate risk, cut costs, and leverage the value of information.

While it is ideal to have an IG council and/or chief information governance officer to help ensure enterprise-wide IG program implementation, the chance for those positions being established is slim when there is a lack of understanding, sponsorship, or resources. It is important for RIM professionals facing these obstacles to help their organizations institute the components of IG in the best way they can.

RIM Must Take the Lead

To make further progress, RIM professionals must work strategically to raise awareness of the importance and value of a comprehensive IG strategy. This is made apparent by Iron Mountain's 2015 research "Overcoming the Disconnect: Establishing Shared Ground between Records Managers and Business Leaders," which indicates 83% of European and 70% of North American employers don't know what RIM professionals do. In return, more than half of those RIM professionals surveyed admitted they are not sure what their senior leaders or other functions across the enterprise expect of them.

Align IG with Business Goals

First and foremost, RIM professionals must understand their orga-

nization's business goals. In almost every publically traded and private business, revenue generation will be at the top of the list; the demands of shareholders and investors must be met for continued success. For governments, meeting the needs of the citizenry is tantamount. So, it is logical that savvy RIM professionals align their programs' activities with being profitable, staying competitive, and delivering on a mission statement.

This article shares five case studies about what some RIM professionals have done to enlighten their organizations about the power of IG and discusses the vital role they played through innovative and practical actions.

They highlight unique drivers for IG and the "hooks" these professionals used to successfully link IG to the bottom line. Sometimes their hook was carefully planned, while other times they seized on an unexpected and serendipitous occurrence. Though these cases are taken from organizations in specific industry sectors, their lessons are applicable across industries and are meant to stimulate readers' thinking about how to promote IG within their own organizations.

Case 1 IG Improves Information Availability

Who would have thought the 2015 record snowfall in New England could be the trigger to raise IG awareness and institute new practices? For years the RIM staff at a particular law firm had advocated for attorneys to become less reliant on paper to manage their cases. The enduring culture of the practice, though, was to be present in the office with records stored in efficient filing systems. When attorneys ventured out of the building, they carried a briefcase full of paper files.

When significant snowfall disrupted or halted transportation into the office for consecutive days, casework was negatively impacted; attorneys

simply had no access to files they required to deliver on client commitments. Suddenly, attention shifted to the notion of imaging client files and storing them in a secure but accessible and collaborative content management system – the domain of the RIM staff, who seized the initiative.

Along with creating specifications and leading vendor selection activities, the RIM team participated in updating the mobile use policy and conducted training to ensure information is protected according to policy and client expectations. All of these undertakings have raised the firm's awareness of information availability and protection – and about the strength and relevance of the RIM team.

Case 2 IG Streamlines Processes

In the oil and gas industry, commodity pricing has diminished budgets and the ability to commit resources to new projects. Many exploration, production, and oilfield services companies have reduced head count, eliminated new hires, and delayed or cancelled technology purchases.

Forward-thinking RIM professionals have adapted to the boom and bust cycles of the industry by viewing the disruption as an opportunity to streamline enterprise policies and processes with a focus on efficiency gains and productivity improvements. Following are four examples of such thinking.

Consolidating Technology Platforms

Storing information in isolated platforms undermines an organization's ability to effectively mitigate risk, cut costs, and leverage the information value. To save money and reduce risk, RIM and IT collaborated to identify all platforms and then applied retention and security controls as applications and systems were consolidated and obsolete systems were decommissioned, eliminating

unnecessary licensing fees and maintenance costs.

Being Involved in Mergers, Acquisition, Divestitures

A downturn in the oil and gas industry creates merger, acquisition, and divestiture (MAD) activity as companies consolidate to manage scarce resources. Earlier MAD initiatives had created separate work teams of due diligence business analysts, legal counsel, internal business experts,

oil and gas industry seek opportunities to raise the visibility and priority of RIM. In this cycle's "bust," streamlining policies and processes, whether through consolidation of technology platforms, streamlined retention management, or collaboration on MAD teams, is proving to be successful.

Case 3 **IG Ensures Compliance**

Consulting firms are expected to meet and prove compliance with their

minimal centralized control, the RIM manager assembled regional records managers who agreed to put a plan in place to standardize and "globalize" their records retention schedule to answer the call for consistency.

In this example, the assertive actions of a seasoned RIM professional helped jump start his firm's IG program.

Case 4 **IG Controls Risk**

Financial services have been on the front line of strict regulatory control for years now, and there are more regulations on the horizon with the prospect of even heavier fines. According to the U.S. Securities and Exchange Commission's (SEC) "FY 2016 Congressional Budget Justification," the SEC is planning to hire 225 additional examiners this year, primarily to conduct additional examinations of investment advisers and other staff.

Given the intense scrutiny by regulators, shareholders, and customers, RIM managers at some of the major financial services institutions in the world have joined with their compliance and internal audit teams to create a set of "controls" for major RIM functional categories, such as disposition, vendor management, and privacy and security. Controls equate to RIM policy requirements, and each has a risk-rating system.

Lines of business are required to conduct a risk self-assessment to identify problem areas and, working with the RIM team, drive the implementation of corrective actions to prevent, resolve, or mitigate key operational, legal, compliance, and reputational risks and costs.

The RIM leaders in each establishment contributed their subject matter expertise in the creation of the risk framework; the compliance and internal audit teams did not have the depth of knowledge in RIM and IG to create the controls or determine their risk rankings.

...the assertive actions of a seasoned RIM professional helped jump start his firm's IG program.

and IT systems support, as well as "islands of information" that left information assets at risk of being orphaned or lost.

RIM leaders presented executive management with a strong business case for involvement in the earliest phase of the MAD life cycle to set realistic expectations in merging or divesting information assets. When MAD teams are formed now, RIM is part of the core team working in unison throughout the MAD life cycle.

Streamlining Retention

RIM professionals streamlined records retention schedules into fewer record series/categories and made sure legal research was up-to-date. If there was no policy on how long to retain the "not records," they engaged with audit, compliance, IT, legal, and the business units to establish organization-wide retention rules for temporary and work-in-progress information – i.e., an information life cycle.

Planning for the Turnaround

The recovery is inevitable, and RIM professionals are looking to the future and planning for the additional workload that is sure to come with the turnaround.

In boom or bust, RIM leaders in the

clients' increasingly rigorous requirements for protecting their information. And if the firm is global, clients also require a consistency of practice across all the locations in which business is transacted.

One firm's savvy RIM manager recognized that satisfying these client demands is crucial to the firm's ability to retain client business in a highly competitive environment. Armed with years of global RIM expertise, he reached out to the firm's compliance and audit teams to offer his services.

The RIM manager conducted workshops to describe how RIM best practices could help produce content for audits and ensure that proper processes for protection and management are in place. This involved discussions about taxonomy updates, content repository usage, and e-mail policy revisions.

Barriers to defensible disposition were explored and a new process adopted to enable more timely and compliant destruction of records. Lastly, refresher training was conducted to remind employees of their RIM responsibilities for both client and firm content.

Although the firm is essentially an aggregation of local practices with

Case 5 IG Protects Intellectual Assets

Within the pharmaceutical and life sciences industry, MAD can seem like a daily occurrence. To remove some RIM inefficiencies and inconsistencies during these complex transactions, the RIM group leader at a global pharmaceutical company made sure she had a place at the MAD table.

In addition to a company's talent, products, manufacturing facilities, and sales and distribution outlets, its records are valuable because they often contain intellectual property, such as research, formulations, clinical trials, and more; they are, in fact, business assets.

Armed with this knowledge, the RIM leader engaged the MAD team and created a process that supports the identification of records of value, paper and electronic, in order to ingest them into the receiving systems of record with the proper tags and security classification codes.

They also reviewed which information (including databases and records) can be disposed of based on a redundant, obsolete, and transitory – often referred to as ROT – analysis and records retention schedule rules, reducing the volume of information they take in from the acquisition.

The RIM team is now involved from the beginning due diligence phase of MAD through the integration of the assets and beyond, including training new employees on the company's RIM program.

Another tactic to extend a RIM leader's value to the bottom line is to collaborate with other companies to broaden and enhance each company's network of IG experts. The Pharmaceutical Records and Information Management Organization (PRIMO) is a membership consortium committed to developing and advancing RIM programs in the industry. Members have learning opportunities quarterly with roundtable meetings and board

meetings that include presentations by experts in the IG field.

PRIMO develops compliance tools, including a model records retention schedule focused on the records of biopharmaceutical companies with retention recommendations based on legal and regulatory considerations.

Lessons Learned: 3 Best Practices

The five case studies highlight that different triggers can be used to raise awareness of IG and different tactics can improve IG controls, even in lean times. Emerging from these case studies are three practices RIM professionals can use to identify opportunities for improving IG and supporting colleagues through disruptive times of change.

Leverage Business Disruptions

When significant snowfall disrupted a law firm's business, RIM staff seized the opportunity to shift attention to imaging client files and storing them in a secure but accessible and collaborative content management system. A downturn in the oil and gas industry refocused the RIM team on streamlining policies and processes.

External collaboration will broaden and enhance your organization's network of IG experts.

Collaborate Internally

Improve IG controls through internal collaboration. In financial services, the threat of increased regulatory scrutiny compelled RIM managers to engage their compliance and internal audit teams to create a set of RIM controls for major RIM functional categories.

At the consulting firm, the RIM manager assembled regional records managers to put a plan in place to standardize and "globalize" their records retention schedule.

The RIM leader at the pharmaceutical company engaged the MAD team and is now involved from the beginning due diligence phase of MAD through the integration of assets and beyond.

Collaborate Externally

External collaboration will broaden and enhance your organization's network of IG experts. The pharmaceutical industry has its PRIMO consortium. ARMA International and AIIM provide industry-focused networking opportunities to benchmark IG best practices and lessons learned.

RIM professionals in the utilities industry established URIM monthly telephone conference calls more than 15 years ago, according to Gail Ann McCreary, a retired Certified Records Manager. URIM members have contributed to more effective regulations and standards by communicating shared goals to regulatory and standard-setting bodies at the federal and state levels.

Seize Any Advantage

The moral of these stories is to seize any advantage that helps raise awareness of IG. Align with business priorities, in particular those that

relate to revenue generation. Take full advantage of the emerging best practices to breathe life into your own organization's IG journey. RIM professionals now know that IG is more than just hype; it's a necessity for organizations to retain their competitive edge. **END**

Susan Cisco, Ph.D., CRM, FAI, can be contacted at Susan.Cisco@gimml.com. Sue Trombley, IGP, FAI, can be contacted at sue.trombley@ironmountain.com. See their bios on page 47.