Even in a "Never Delete Anything" World, Compliant Information Disposition Has Its Place
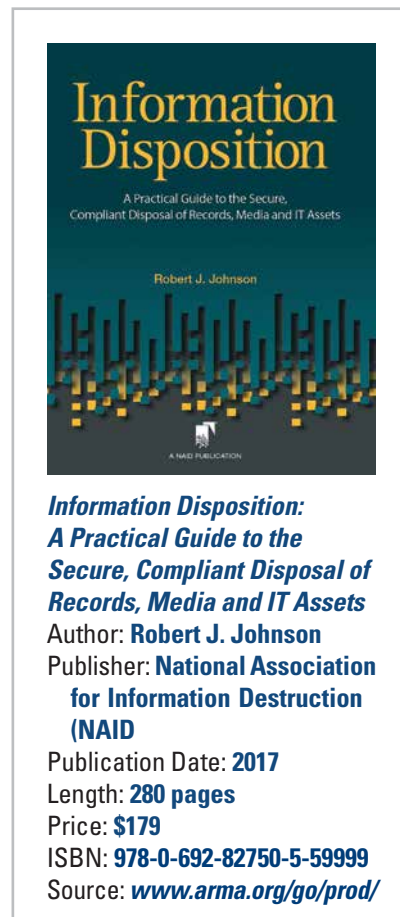
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One of the biggest challenges to the disposition of information is posed by attitudinal shifts fostered by technological advancements. Who could argue with Google executive Tom Kershaw's advice that appeared in *The New York Times* "Bits Blog" in March 2015?

"Never delete anything, always use data – it's what Google does."

But in *Information Disposition: A Practical Guide to Secure, Compliant Disposal of Records, Media and IT Assets*, Robert J. Johnson makes a good argument against that advice. The title implies that disposition – of at least some records, media, and IT assets – is a necessity. Johnson, who is the chief executive officer of the National Association for Information Destruction (NAID), a non-profit trade association established to educate on the importance of proper destruction of information, explains *why* and *how*.

NAID represents more than 1,800 member-organizations that provide commercial secure destruction services worldwide; therefore, it is not surprising the author promotes secure destruction as an essential compo-

Information Disposition: A Practical Guide to the Secure, Compliant Disposal of Records, Media and IT Assets
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nent of an organization's information governance strategy.

Audience

The content aligns closely with the NAID certification requirements, which makes it a valuable resource for data security professionals. In addition, records management and compliance officers will find their understanding of the issues clarified, and operations managers in small- and medium-sized companies will appreciate guidance they can use when making information protection and information disposition decisions. Students pursuing careers in archives, law, information governance, and related careers will become aware of issues related to protecting information that has met the end of its useful life.

Jurisdiction

Examples are drawn from U.S. federal and state sources, except for one figure listing the data protection laws of Australia, Canada, the European Union, Hong Kong, Japan, Mexico, New Zealand, Singapore, and South Africa.

Source Format

Sources are cited at the end of each of the nine chapters, many with links to the resources online. They include books, publications by professional associations and departments of the federal government, state regulations, national standards,

and numerous works authored by Johnson.

Standards and Best Practices

Currently the most significant records management standard is *ISO 15489-1:2016–Information and documentation—Records management—Part 1: Concepts and principles.* Section 9.9 on disposition states that records destruction should be conducted in a way that "ensures complete destruction and which complies with any security or access restrictions on the record." However, precisely how destruction should be accomplished is not explained. Johnson's work picks up where the ISO guidance leaves off when it comes to records disposition but assumes an expanded view of a record to include "any recorded information created in the course of or as a function of an organization."

Content

Johnson introduces the reader to data protection regulations in the United States and abroad. He emphasizes the need for digital and physical security. He stresses the importance of classifying records that require special handling (e.g., personally identifiable information, internally sensitive information). He introduces secure destruction methodologies, policies, and procedures. And he provides case laws relating to

disposition as well as examples that demonstrate the need for data/document destruction policies.

What Is Missing

The terms *electronically stored information* (ESI) and *Federal Rules of Civil Procedure* (FRCP) are missing from the glossary and index. Based on case law related to "sporadic or undisciplined records disposition," inclusion of the broad term ESI is warranted. In addition, when addressing "The Reasonableness Standard," the author could have made note of the December 2015 amendments to the FRCP. The Sedona Conference®, a non-profit research and educational institute, is a reliable source for changes in law and policies related to ESI. Mention of this resource would have been of value to readers as well.

Bibliographic Tools

Chapters 1 through 8 include a brief introduction, a conclusion, and a list of resources. Five of the eight chapters contain one or more appendices. Chapter 9 provides a glossary of more than 100 terms. The glossary is followed by an eight-page index.

Recommendation

Johnson's laser-like focus on "information disposition" is unique. He provides a wealth of content that

anyone responsible for information disposition can put to immediate use to comply with current laws, regulations, and policies. For the rest of us, it provides an overview of the data protection regulations and disposition practices we should be familiar with. For information professionals specifically, it provides answers to "how" the guidance provided in ISO 15489:2016 that is related to information disposition can be accomplished. **E**

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