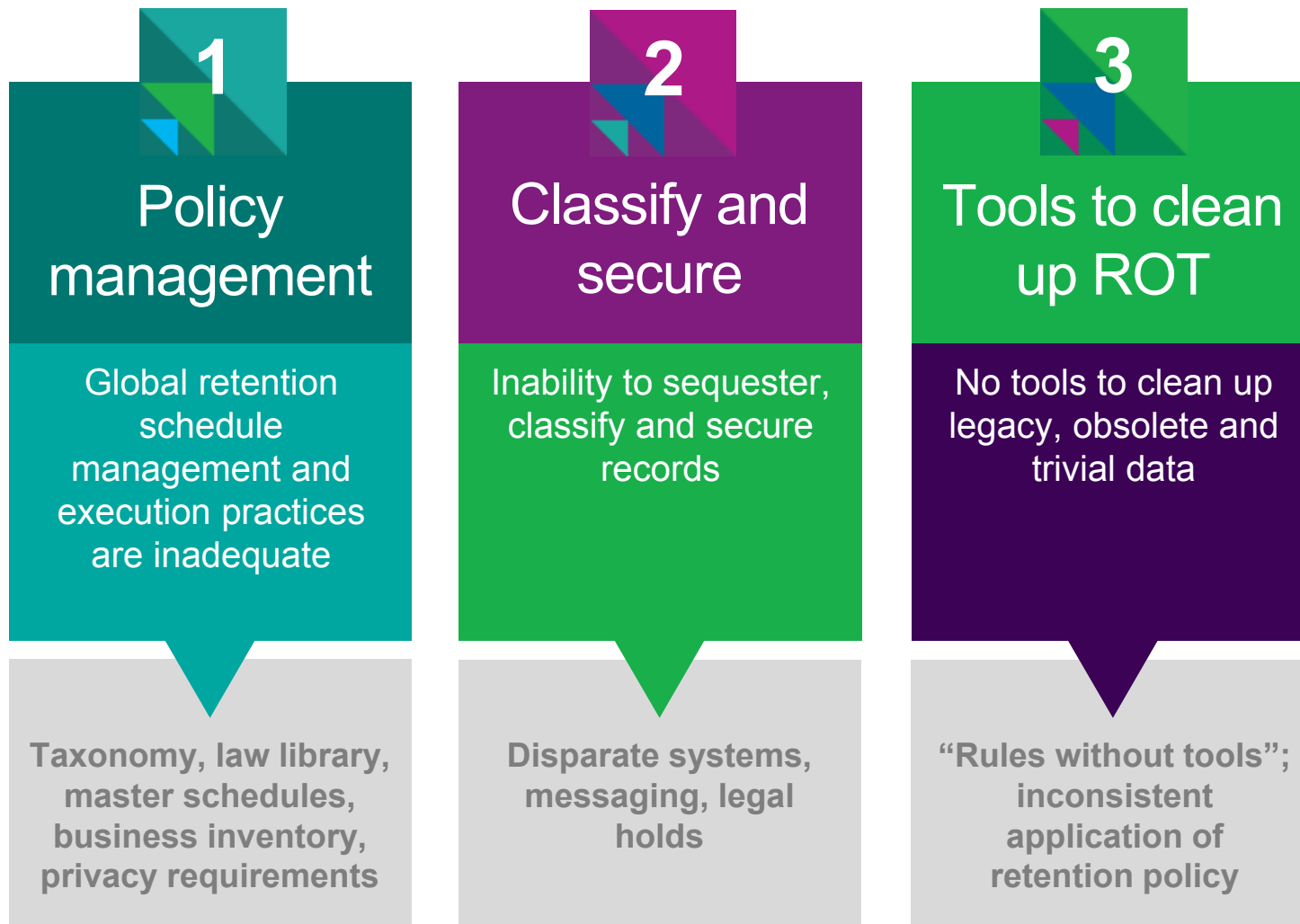# Delivering Enterprise Value with Effective Records Management

Improving Information Economics

Agenda

- RIM and Governance Challenges
- IBM's Solution For Records and Retention, and ILG
- What's New in IBM's Records and Retention Solutions
- What's Next

Typical Challenges in Records and Compliance

1

Policy management

Global retention schedule management and execution practices are inadequate

Taxonomy, law library, master schedules, business inventory, privacy requirements

2

Classify and secure

Inability to sequester, classify and secure records

Disparate systems, messaging, legal holds

3

Tools to clean up ROT

No tools to clean up legacy, obsolete and trivial data

"Rules without tools"; inconsistent application of retention policy

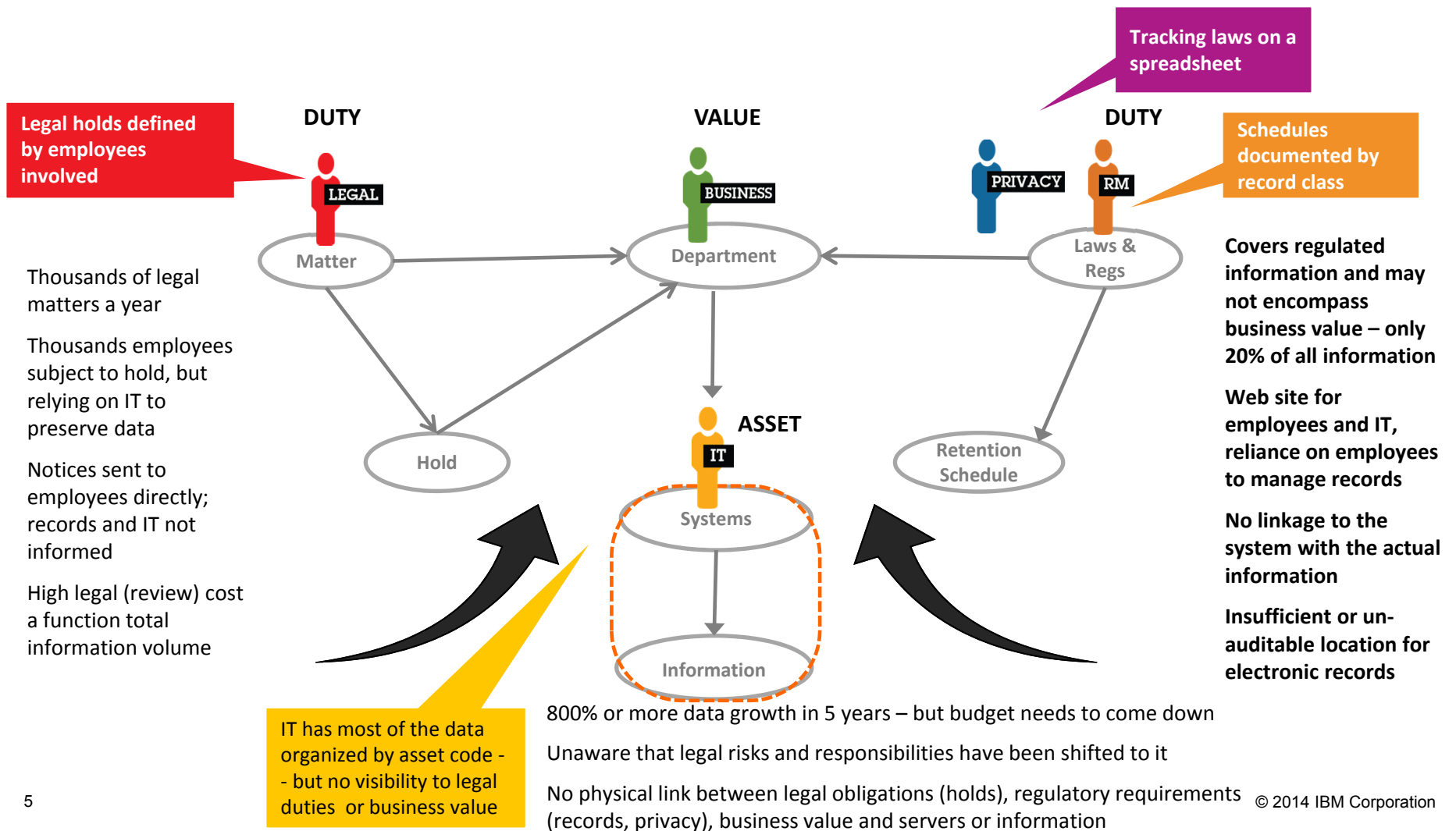# RIM team challenges and process complexity

RIM

IT

BUSINESS

Complexity in retention schedule

- One global policy with hundreds of records classes

- Policies are created and distributed to employees, but there is no indication that they are being followed for electronic data

- Overretention is rampant; the organization keeps everything forever and ends up with piles of legacy data

Complexity in IT and lines of business

- Thousands of departments with unique naming conventions; no alignment with the global retention schedule

- Thousands of systems in IT that may have records in them

- Employees in the tens of thousands who need to follow the retention schedule but can't or won't classify records

RIM Challenges and Related Stakeholder Leading to Increased Cost and Risk

Tracking laws on a spreadsheet

DUTY   **VALUE**   **DUTY**

Legal holds defined by employees involved

LEGAL   BUSINESS   PRIVACY   RM

Schedules documented by record class

Matter   Department   Laws & Regs

Thousands of legal matters a year

Thousands employees subject to hold, but relying on IT to preserve data

Notices sent to employees directly; records and IT not informed

High legal (review) cost a function total information volume

Hold

ASSET

IT

Systems

Retention Schedule

Covers regulated information and may not encompass business value – only 20% of all information

Web site for employees and IT, reliance on employees to manage records

No linkage to the system with the actual information

Insufficient or un-auditable location for electronic records

Information

IT has most of the data organized by asset code - - but no visibility to legal duties or business value

800% or more data growth in 5 years – but budget needs to come down

Unaware that legal risks and responsibilities have been shifted to it

No physical link between legal obligations (holds), regulatory requirements (records, privacy), business value and servers or information

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Most organizations struggle to align supply to demand: Information value declines over time, but cost and risk do not

BUSINESS

- **Information volume doubles every 18-24 months in most organizations**
- 90% of the world's information was created in the last 2 years[1]

LEGAL

- **It costs $18,000 to do e-discovery on 1 gigabyte[2]**
- e-discovery consumes as much as half of litigation budget

IT

- **$4M to store 1PB and app cost materially adds to run rate[3]**
- Data storage consumes growing share of budget; sun setting too slow
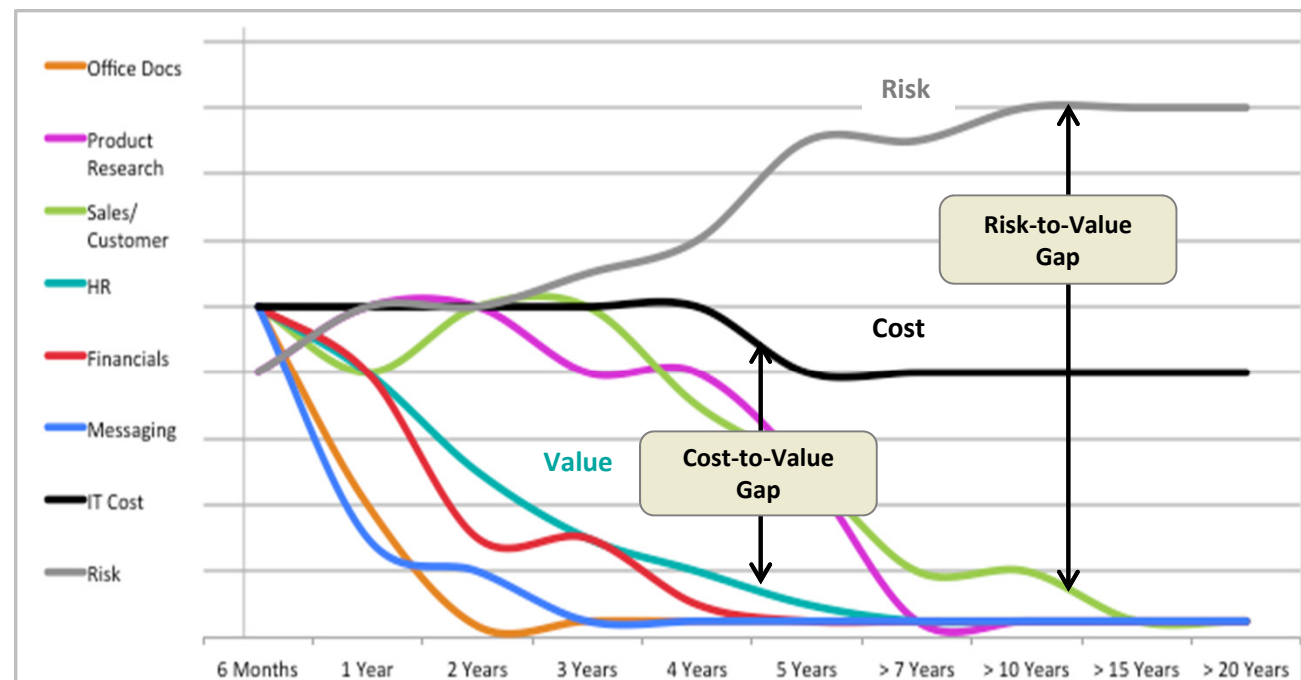
1 Source: Big data: The next frontier for innovation, competition, and productivity McKinsey & Company, 2011 Study
2 Gartner e-discovery Report
3 CGOC 2012 Summit Survey

Proper RIM helps reduce costs and risks associated with overretention

Dispose of unnecessary data = cost and risk reduction

Legal hold: Hold and collect evidence **1%**

Regulatory record keeping: Retain records and dispose **5%**

Business value: Archive for value and dispose **25%**

69%
Information without duty and value = unnecessary data

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Agenda

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o   What's Next

Solution View – Records Compliance Lens

- Manage global taxonomy and retention schedules for all information

- Manage privacy & data protection requirements globally and by jurisdiction

- Coordinate retention program across business units, records liaisons and legal more efficiently

- Collect, classify and sequester records for ready, rapid retrieval

- Syndicate and enforce retention schedules on structured and unstructured records and information

- Extend your existing ECM investment

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Systematically Lowers 6 of 18 Governance Risks

G	Company is unable to comply or demonstrate compliance with its regulatory record keeping obligations. Disparate nomenclatures for records make application of retention schedules/procedures difficult to apply and audit
H	IT 'saves everything' which increases discoverable mass, complexity and legal risk; IT disposes of information of business value undermining enterprise operation. Procedures for retention/disposal difficult to articulate and defend and unapplied by LoB
I	Important business decisions are made on missing information or poor quality information, resulting in poor decisions. Information is not used shortly after its creation because business has forgotten the source or location of information or can't find it, resulting in cost without corresponding value.
J	Information of value is not properly secured against internal security violations or external security breaches; entities can bypass or contravene security policies, practices, or procedures. Failure in securing information deeply heightens privacy issues if information accessed is not properly protected.
K	Access, transport and use limitations are not understood by employees with information custody or collections responsibility and customers or employees rights are impacted
R	Unable to demonstrate reasonable efforts to establish and follow governance policies and procedures increases sanctions risks, penalties and judgments and erodes customer trust

Highest Risk

Potential Impact

Likelihood to Occur
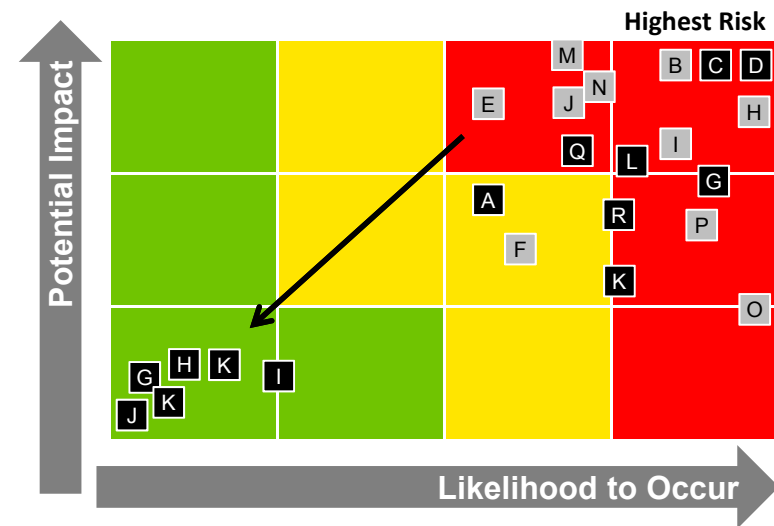
High risk Requires constant monitoring and review, immediate escalation on failure or impending failure. 50% likelihood

Moderate risk Requires frequent monitoring to prevent and detect; costly to correct or mitigate. Between 10% -50% likelihood

Low risk Does not require constant monitoring and is easy to prevent, detect, correct, defend. Less than 10% likelihood

Manage Global Taxonomy & Schedules Efficiently, Ensure They Tie to Law

Use a single, consistent taxonomy globally across records, business and IT.

Catalog the laws that dictate both retention and privacy requirements along with policies for security in a shared law library. Associate law and policy to specific procedures to enable changes in either and to retain less data more defensibly.

Define master retention schedules. Enable employees to see only their specific rules. Allow online change requests with automatic routing to policy owners.

Outcome: Company understands the specific record keeping and privacy laws that apply to the businesses in the jurisdictions in which they operate. Employees understand and company can demonstrate compliance with actual records obligations [G, J, K].

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Conduct Information Inventories, Define Business Value & Link to Location of Information to Enable IT Execution, Improve Holds

Easily catalog the classes and types of information within the organization and where and how it should be managed.

Data-source specific retention and management procedures and applicable legal hold overrides are <u>automatically</u> created for IT, tying obligations and value to assets.

Easily enable country and local schedule variations as needed; compare retention practices for the same information across business, systems.

Outcome: *Legal has a reliable "data map" by organization [B, C, D]. IT can manage information based on legal, records and business needs [N, O, P].*

| Details | Citations | **Information Types** | Policy Syndication |

No filter applied · Search Filter

Information Type	Retention Period	Data Source
107RecordType	Short Term	Iron Mountain - GWM Private Bank - Chicago
	Long Term	Iron Mountain - GWM Private Bank - Chicago
	Regulatory	Iron Mountain - GWM Private Bank - Chicago
Account Documents	Short Term	Iron Mountain - GWM Private Bank - Chicago
	Regulatory	Iron Mountain - GWM Private Bank - Chicago
Common Office Doc...	Short Term	Onsite Storage - SF

Data Source Catalog » Credit Report System - PROD
Policies

Generate Report

Credit Report System - PROD

Details · History · Related Data Sources · Servers · **Policies** · Holds and Collections · Plan Templates · Policy Syndication

Data Source Details ▾

| All Hold... | Collections | **Retention Policies** | Archive Policies | Backup Policies | Security and Privacy Policies | Storage Policies |

Sort by: Longest Retention First ▾

Show Notes

No filter applied · Search Filter

| Schedule	Organization	Information Types	Short Term Retention	Long Term Retention	Regulatory Requirements	Owner
Human Resources	EUROPE - V	Human Resources	14 Year(s)	✓ Declaration of record + 14 Year(s)	3 Year(s)	Administrator, System
LNS100, Bank Cards/...	Alternative Investme...	Credit Card Service ...	Transitory Record	Contract Expiration	✓ Account/Relationship is open/active + 7 Year(s)	Gordon, Sarah
HUM420, Personnel Fi...	GWM-Private Bank U...	Personal Record		Transitory Record	✓ Employment is terminated + 4 Year(s)	Ross, Alex

Schedule name: LNS100, Bank Cards/Cred Cards -Credit/Loan Record

Description: Records comprising the ca file and official history of a credit card customer. This record class reflects the establishment and maintenance of a credit ca customer relationship. It a contains records regarding closure of a credit card customer relationship.

Organization: Alternative Investments

Information types: Credit Card Service Agree Credit Card Application

Short term retention: Transitory Record

Where ...

Local Schedule Title	Organization	Description	Regulatory Requirements	Short Term Retention	Long Term Retention	Status
HUM420, Personnel Files	Corporate: Operations: Human Resources (US)	Records providing a history of employment from initial hiring through termination/resignation.	Event + Fixed Time Employment is terminated 7 Year(s)	Transitory Record	Transitory Record	Approved
HUM420, Personnel Files	Corporate: Energy: Upstream: Exploration: North America: Gulf of Mexico (US)	Records providing a history of employment from initial hiring through termination/resignation.	Event + Fixed Time Employment is terminated 7 Year(s)	Transitory Record	Transitory Record	Incomplete

Showing 1 - 2 of 2 · Page:

Assess Data Sources to Determine and Prioritize Policy Remediation and Compliance Targets

Assess data to determine over-aged and other non-compliant data.

Extract records and move to appropriate repository while enforcing disposition on file share, SharePoint and other data sources.

Outcome: *Retention schedules are consistently and appropriate enforced to reduce excess eDiscovery [E] and compliance issues [G, H, P]. IT can manage information based on legal, records and business needs [N, O, P].*
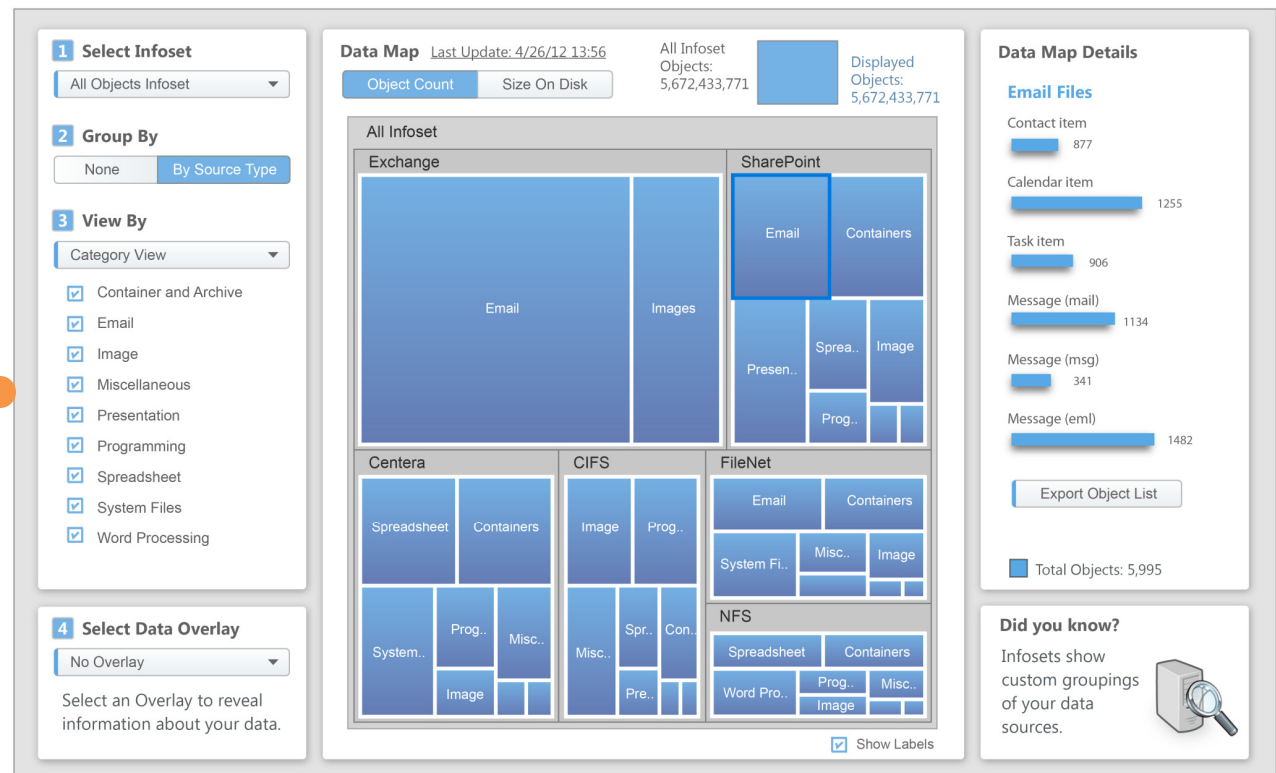
Align and Reconcile Retention, Privacy and Security Obligations Globally and Enforce Them Locally

Provide precise actionable instructions to information holders on the applicable privacy and security obligations; enforce them on unstructured and structured data automatically.

- Retention
- Disposal Method Requirements
- Storage Media Requirements
- Security Requirements
- Use Limits
- Transport or Transfer Requirements
- Disclosure of Failure Requirements

Outcome: Company understands the specific privacy and data security laws that apply to the businesses in the jurisdictions in which they operate, globally. The policies are then executable across a global program [G, J, K, R].

Provide Employees With a Customized View Of Their Record and Information Obligations to Simplify Compliance & Enable Defensible Disposal

Show employees specific portions of the retention schedule that apply to the information they create and use. They can easily see where information is and where it should be retained and for how long.

My Schedules

Name	SAL180, Product Marketing Plans
Local Name	aka "Marketing Plans", "Campaigns", or "PM Plans"
Belongs To	Corporate: Pharmaceuticals: Pain Managment: Supressa: Marketing (Supressa)
Code	SAL180
Description	Records related to marketing plans and activities for products and services offered by the company. See SAL100 for Advertising Artwork
Local Description	
Records Officer	Benson, George
Office of Record	Corporate: Pharmaceuticals: Pain Managment: Supressa
Retention	Superceded or discontinued + 4 Year(s)

Record Types

Name	Local Name	Document	Data Source Name	Data Source Location
Product Marketing Concalls	Concall Sessions	Drafts	Phone System (VOIP)	10 Wall Street New York US:United States
Product Marketing Concalls	Concall Sessions	Official	Phone System (VOIP)	10 Wall Street New York US:United States
Product Marketing Plans		Official	RM Legacy	17400 Bayshore Drive Los Angeles US:United States
Product Marketing Concalls	Concall Sessions	Official	RM Legacy	17400 Bayshore Drive Los Angeles US:United States
Product Design Process Flows		Official	RM Legacy	17400 Bayshore Drive Los Angeles US:United States
Packaging Designs	Packaging Layouts	Official	RM Legacy	17400 Bayshore Drive Los Angeles US:United States
Focus Group Blasts		Official	RM Legacy	17400 Bayshore Drive Los Angeles US:United States
Email Campaigns	Email Blasts	Official	RM Legacy	17400 Bayshore Drive Los Angeles US:United States
Advertising Campaigns		Official	RM Legacy	17400 Bayshore Drive Los Angeles US:United States
Product Marketing Plans		Drafts	Marketing - File Storage	17400 Bayshore Drive Los Angeles US:United States
Product Design Process Flows		Drafts	Marketing - File Storage	17400 Bayshore Drive Los Angeles US:United States

Outcome: Business value and record obligations are known and understand organizationally [G, H, I]. Legal , IT and Audit ʹs confidence in governance processes increase, enabling defensible disposal [N, O, P, R].

Systematically Collect and Classify Records to Improve Compliance, Simplify Regulator/Litigation Response and Avoid Burdens on Employees

Data-source specific retention schedules can be applied and executed.

Configure and schedule automated business value retention policies against unstructured data sources.

Outcome: *Retention and Business Value schedules can be consistently and systematically applied across the enterprise. IT can dispose of information with confidence [H, I, N, O, P].*

Execute Retention and Disposal Across Records and Information in Lock Step with Legal

Legal holds are systematically syndicated as legal identifies records and information on hold.

Local schedules and individual records are flagged and held.

Syndicate retention schedules to repositories and information archives for in-place execution, including robust records management within ECM.

Collect and classify records, including auto-classification; collect structured and unstructured information to archive and dispose per retention approved schedules.

Outcome: *Retention schedules can be consistently and systematically applied across the enterprise [F, M, N, P, Q].*

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Execute Retention Schedules Automatically on Structured and Unstructured Data for Efficient, Defensible and Routine Disposal

Access and execute approved schedules on records repositories, structured and unstructured archives, SharePoint and other data sources.

Changes in business or regulatory requirements initiated by policy owners are automatically syndicated for reliable, defensible and efficient execution.

Application archive automatically receives retention and disposition schedule to execute on records.

Outcome: IT can dispose information based on legal, reg and business needs in an automated, defensible way [A, B, C, F, G, H, I, L, M, N, O, P]. Cost, risk and effort are reduced.

| Tasks | Setup | Logs |

Show: All

ID	Name	Task	Occurred On	Status:
192	SAL120, Customer Relations	Change Local Schedule	Oct 23, 2011 5:42:23 PM	Execute
191	SAL120, Customer Relations	Change Local Schedule	Oct 22, 2011 1:12:43 AM	Completed
190	SAL120, Customer Relations	Add Local Schedule	Oct 22, 2011 12:50:10 AM	Completed
182	ADM100, Internal Services			Completed
				Completed
180	ADM100, Internal Services			Completed

My Atlas
Alert Detail

Date: Dec 31, 2008 1:25:21 PM
Subject: SCHEDULE CHANGE: HUM420, Personnel Files

Schedule: HUM420, Personnel Files
Modified By: Administrator, System
Change: modified
Reason for Change: Retention period updated based on new citation added.

The following fields for HUM420, Personnel Files were modified:

Message
Retention Sche Status Execute
Disposition: 7

Title	BNK100, Account Set-Up/Maintenance
Record Code	BNK100
Record Category Name	BNK100 Global Investments-Portfolio Group US (US)
Record Category Identifier	BNK100-LSEZ
Version	1
Triggering Event	Account/Relationship is open/active
Retention Type	Event + Fixed Time
Triggering Metadata Field	DateCreated
Period	5 Year(s)

PSS_200 - Storage Profile Definition
File Edit Tools Options Help

Description:
SAL120, Customer Relations

Segment Sizes (MB)
Fixed: 0   Removable: 10

Primary Copy | Retention Policy

Automatically Delete File
☑ Delete after:
Days 365

LOCAL
File Edit Tools Options Help
Description:
PACustomers Access Definition   ☐ Global Archive Actions specified
Tables | Relationships | Variables | Point and Shoot
Default Qualifier: DBO.DBO
Start Table: OPTIM_CUSTOMERS   (No Point and Shoot list in use)

Table/View	Type	DBMS	Table Specifications	Ref Tbl	Delete Rows After Archive	Extract Parms Row Limit
1 OPTIM_CUSTOMERS	Table	SQL Serve		☐	☐	
2 OPTIM_SALES	Table	SQL Serve		☐	☐	
3 OPTIM_ORDERS	Table	SQL Serve		☐	☐	
4 OPTIM_DETAILS	Table	SQL Serve		☐	☐	
5 OPTIM_ITEMS	Table	SQL Serve		☐	☐	
6						

Automate Disposition and Storage Tiering on Structured Data

Apply the right retention and disposition policies and execute on structured data without modifying every application.

Archive retention and back up practices are tied to authorized policy so data is stored on the right tier for the right period of time; the source of policy and rules are transparent, controlled and valid.

Outcome: IT staff can manage and store data aligned with actual obligations and business need [M, N, O, P, Q]. Practices are transparent, defensible and cost efficient [F, G, N O, P]. Data required by regulators and business can readily be restored while unnecessary data is disposed. [G].

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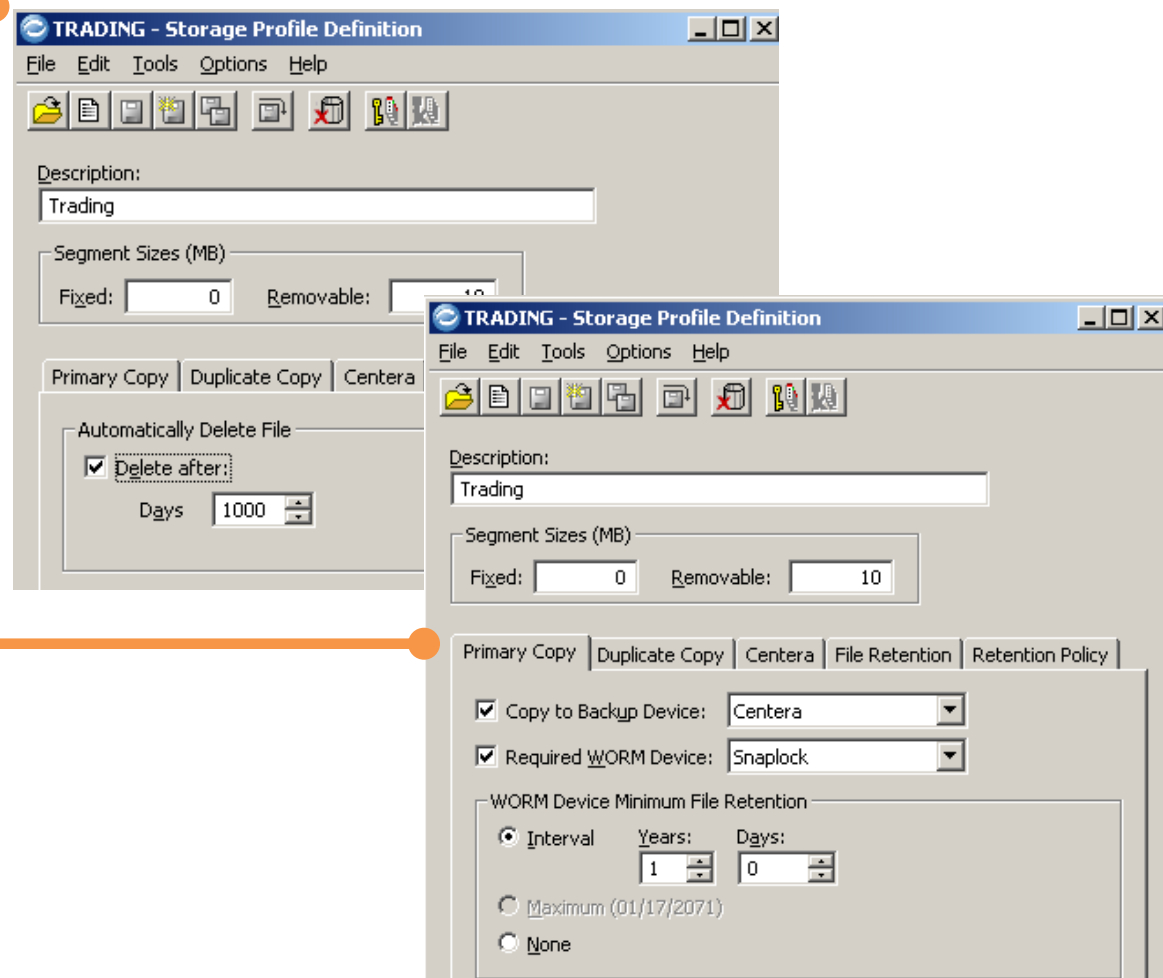
Automate Disposition on Unstructured Data in Its Native Location

Data filters and visualizations (e.g. data source, age, content owner, etc.) allow IT to quickly hone-in on disposal candidates. Content held or retained is ineligible for disposal.

IT can dispose in place or move to a staging location prior to disposal.

Outcome: IT can dispose information based on legal, regulatory and business needs in an automated, defensible and transparent way [A, B, C, F, G, H, I, L, M, N, O, P]. Both cost and risk are reduced and manual efforts to instantiate disposal and document the activities are minimized.
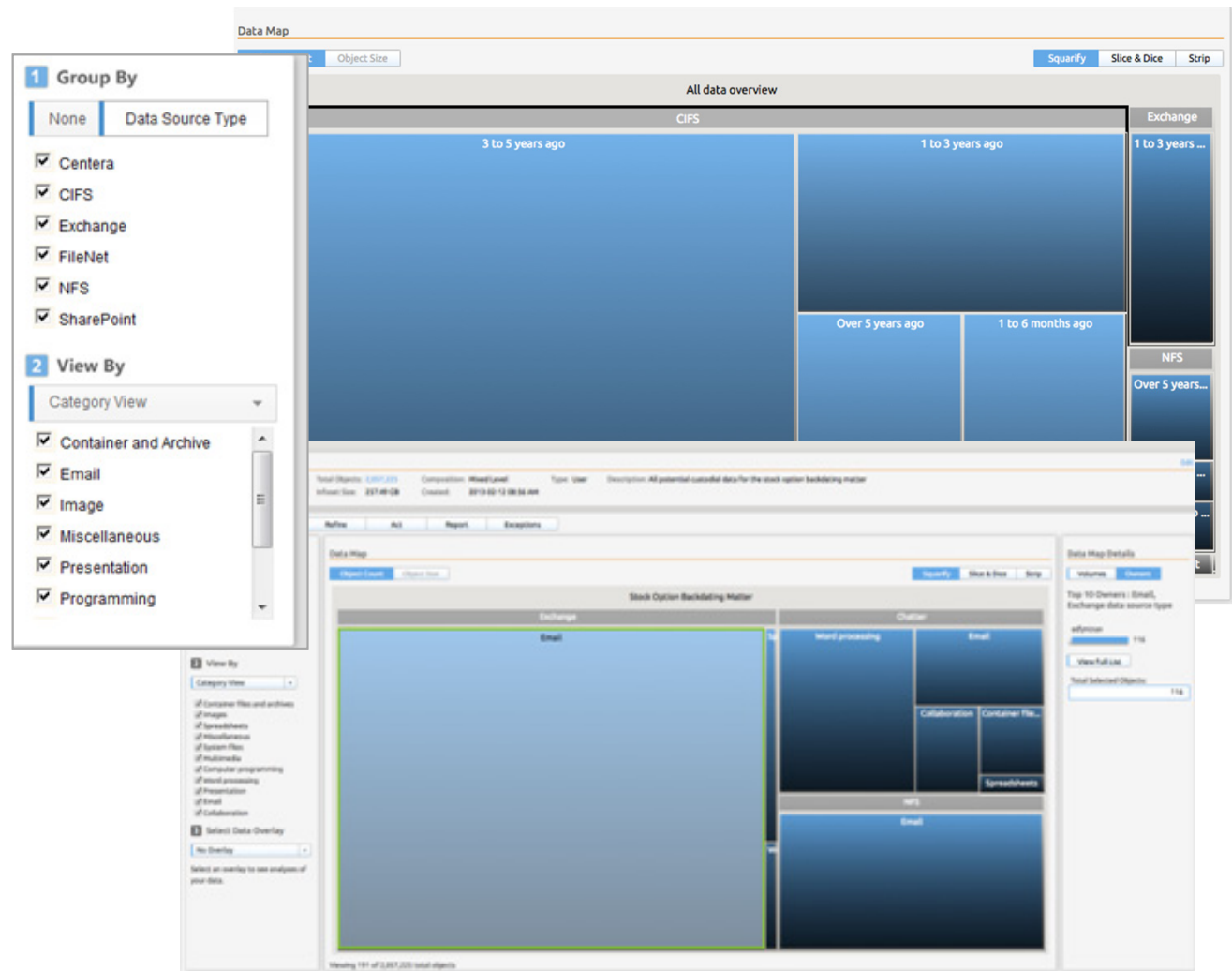
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IBM Global Retention Policy and Schedule Management

New Capabilities in 2013

- Capture additional record type parameters and provide greater visibility of details for organizations and data sources in local schedules

- Master schedule change propagation to local schedules (business inventories)

- Integration: New retention policy connectors for IBM repositories:

    - New Content Manager OnDemand (CMOD) Retention Connector

    - Enable IBM Content Collector to accept retention schedules

    - New FileNet Content Manager Retention Connect

- New Cognos report - Local schedule details and history

New Information Type

Schedule name:

| Overview | Repository Mapping |

Show Notes

Name:*	Common Office Documents
Description:	Common office documents required to conduct day to day business.
Media type:	Electronic and Paper/Physical
Security:	Internal
Privacy:	
Confidentiality:	No sensitive information
Integrity:	Sensitive
Availability:	Protected
Risk weight:	Very sensitive

Save   Save and Close   Cancel

▼ Retention Schedule

Prevails	Type	Schedule Type
	Short Term Retention ↩	Transitory Record
	Long Term Retention ↩	Inherited from Master Schedule ~~Transitory Record~~
✔	Regulatory Requirements ↩	Event + Fixed Time

IBM Enterprise Records

New Capabilities in 2013

- Redesigned, simplified user interface based on IBM Content Navigator technology enables customers to more easily deploy, manage, and use records management throughout the enterprise

- Integrated (GUI based) disposition enables records professionals to manage and initiate disposition without burdening IT

- Enhanced Atlas Policy Suite integration to expand customers' ability to defensibly dispose of excess data

- Bundling and leveraging Cognos Reporting tools for enhanced reporting and analytics
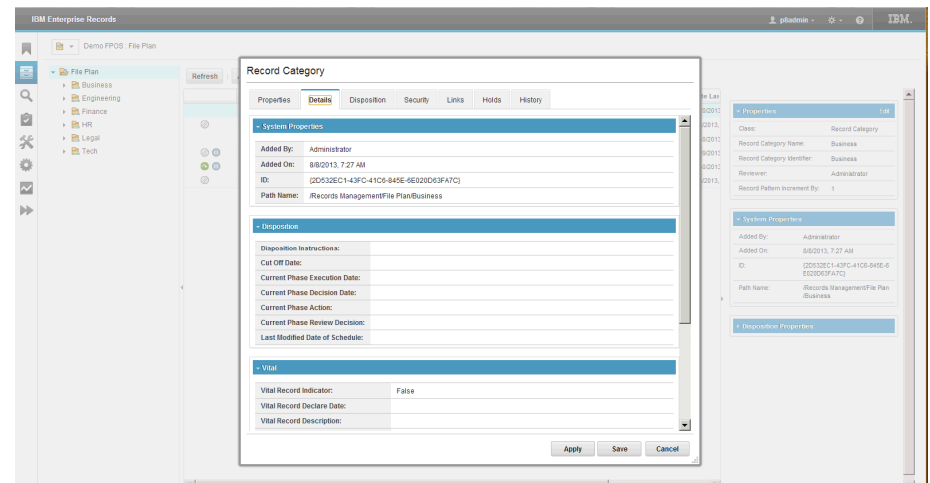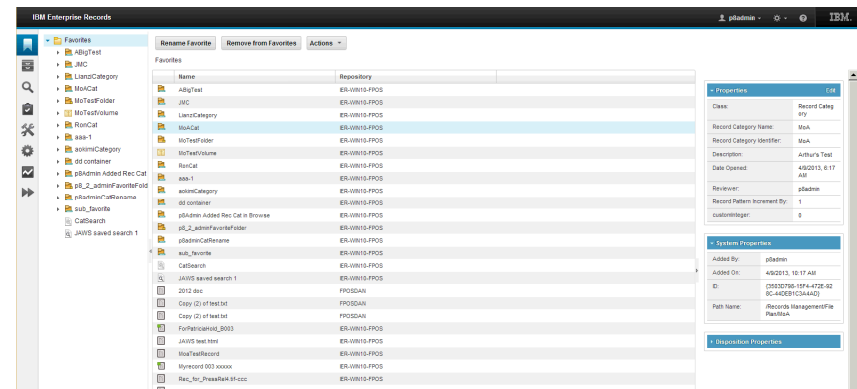
IBM Policy Assessment and Compliance

Core Capabilities

- Enforce information governance policies across enterprise data sources

- Spot and remediate compliance violations, records teams can uncover documents with retention requirements, and IT teams can clean up data that has no value to the business

- Provides advanced visualizations and reports to help users better understand their data, hone in on policy issues, and remediate

- Leverage the intelligent policy engine to quickly take action on the data, such as: copy it to a centralized repository, move it to a more secure location, or dispose it immediately

- Assess terabytes or petabytes of data to understand its content and context across 75 data sources including desktops and 450 file types
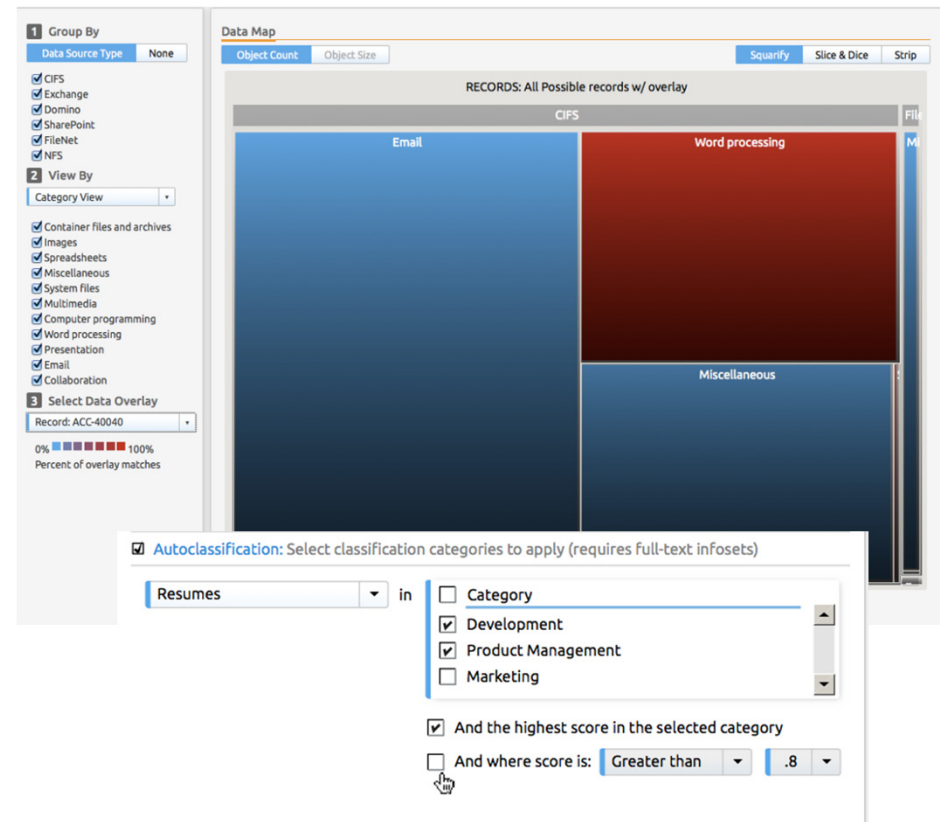
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Keep the conversation going!
Talk further with the ILG team at your organization and at these upcoming events!

Setup a call with IBM's ILG Experts to assess your records and retention maturity

o   Brent Pohl – bpohl@us.ibm.com - +1 (512) 286-3225

3rd Party Industry Events:

o   Wisconsin IT Symposium | Milwaukee | May 7

o   AIIM Seminar – Resetting SharePoint Expectations | Toronto | May 15

o   MER Conference | Chicago | May 19 – 21

o   AIIM Seminar – Resetting SharePoint Expectations | NYC | May 20

o   AIIM Seminar – Resetting SharePoint Expectations | DC | May 22

o   ARMA Canada | Ottawa | June 8-11

IBM Lunch & Legacy Data Cleanup Event Series – coming to a city near you!

o   Lunch & Learn| Dallas | May 6

o   Lunch & Learn | Kansas City | May 14

o   Lunch & Learn | St. Louis | May 28

o   Lunch & Learn | DC | TBD

o   Lunch & Learn | Buffalo | TBD

o   Lunch & Learn | Rochester | TBD

Learn More & Join the Conversation
Compliance, Governance and Oversight Council

Join the CGOC!

- Forum of over 2,000 corporate legal, IT, records and information management professionals. CGOC conducts primary research, has dedicated working groups on challenging topics, and hosts meetings throughout the U.S. and Europe where practice leaders convene to discuss discovery, retention, privacy and governance.

- Mission: To provide executives the opportunity to benchmark and exchange case studies; its practice groups focus on discreet areas in preservation, retention, and information governance to deliver work products that help our members best approach the challenges in maintaining best-in-class programs.

Online and in person events
Regional and International summits
Published materials

Benchmark Report on Information Governance in Global 1000 Companies (CGOC Publication, 2010)

Information Lifecycle Governance Leader Reference Guide (CGOC Publication, 2012)

German State Orders Businesses to Close Facebook Pages Over Privacy and Data Protection Issues (CGOC Advisory, 2011)

Elements of the Modern, Executable Retention Schedule (Work Product of the CGOC RIM Practice Group, 2011)

Additional ILG Sessions at Content 2014

o Second Generation Archiving – Shinning The Light on Dark Data

o Stop Data Hoarding – Cleaning Up Your Legacy Data

o Mitigate Risk With Cost Effective eDiscovery