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The information governance imperative: Expert advice for developing a strategic plan to govern critical enterprise information

Information governance programs can help organizations set policies, procedures and controls for managing and using all types of corporate information, from structured data to unstructured content such as documents and email messages. But information governance is a relatively new and still-evolving discipline, and many organizations have yet to align their processes for governing structured data and unstructured information. In this eBook, readers will find an overview of key information governance issues and practical advice on building a business case for information governance, developing an information governance strategy and structuring an information governance program.

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Table of Contents

[Weighing the need for an information governance framework: key issues](#)

[Developing an information governance strategy: tips on getting started](#)

[Information governance policy issue: Who owns a governance program?](#)

[Building the business case for an information governance process](#)

[Resources from IBM](#)

Weighing the need for an information governance framework: key issues

By Chris Maxcer, SearchContentManagement.com Contributor

At first glance, information governance may seem like just another buzzword phrase, competing for attention in the vast landscape of similar terms covering similar topics. If information is data, how does information governance differ from data governance? And where do information management, enterprise information management (EIM), enterprise content management (ECM), knowledge management (KM), e-discovery, governance, risk and compliance (GRC), records management, IT governance and master data management (MDM) enter the information governance picture?

In practical use, information governance is somewhat of an umbrella term, covering multiple elements of related data and governance disciplines. It starts from a perspective of controlling information-related risk in an enterprise, beginning with structured data (data in databases) and extending to unstructured information governance (documents, email, instant messages, images). In short, information governance looks at the larger issue of governing all types of corporate content.

To cover that broad swath of content, an information governance framework must extend beyond hardware and software into management policies, procedures and decision rights that shape how an organization creates, uses, stores and deletes information – all the while minimizing legal and regulatory risk.

In short, any definition of information governance ends up becoming the sum of many, sometimes seemingly incongruent, elements of information management.

“The worlds of data governance and content governance are not at all aligned,” said Rob Karel, principal analyst for data management at Forrester Research Inc. “How do people access data when they are trying to answer a question through reporting or business intelligence? They ask a very structured question and they get the right answer.”

“Now, how do people access information with content? They go do a search and they get 100,000 potential answers and they are OK with that, flipping through it until they find the answer for them. There are very different cultures in how these kinds of information are managed,” Karel added.

Functional data like customer data, product data or financial data is very structured and process-centric.

“Data, by definition, is already being governed by the physical structure that it is in,” Karel said. “With unstructured, anyone with a laptop can create new content. So governing it – it’s a different set of stakeholders, and it requires a different set of competencies, so spanning across both may result in biting off more than you can chew.”

Drivers not lacking for an information governance framework

There are lots of drivers for information governance initiatives, according to Jill Dyche, a partner and co-founder of Baseline Consulting Group Inc.

“Many of them are normal company evolution issues like risk management, compliance, revenue management, and policy-making around customer information,” she said. “Many are also industry-specific, like state reporting in the pharmaceutical industry or an enterprise master patient index in health care.”

Meanwhile, understanding the processes for decision-making and oversight around corporate data is becoming a C-level and board-level mandate.

A number of factors have contributed to the rise in information governance initiatives, said Debra Logan, an enterprise information management and governance analyst at Gartner Inc. While IT has faced increasing storage requirements the solutions has been buying more drive space. Additionally, in highly regulated industries, compliance mandates led to archiving systems, followed by the rise of e-discovery laws and the recent global recession.

As costs and complexity mounted for compliance, regulation and e-discovery people began to realize they had neglected the information governance process.

“People were never deleting anything, taking care of email, or teaching people how to use things, and nobody was in charge of information except IT, and IT was basically just in charge of the physical infrastructure, not how the business uses information,” Logan said. “Now in the regulated industries, you’ve got a lot of legal focus, risk focus and privacy compliance issues that have really brought information governance into focus – people are now starting to see it as a larger problem and not just IT’s problem.”

Legal costs associated with e-discovery have been one of the biggest drivers.

“You see judges having almost zero-tolerance policies about organizations being ignorant about their duties,” said Barry Murphy, an information governance consultant and CEO of the online publication eDiscovery Journal. “For many organizations, it’s because of issues like e-discovery that they are putting information governance on the fast track.”

Expanding vision helps fuel information governance push

The big push for information governance isn’t all focused on reducing risk and deleting content to save on storage costs – some CEOs are looking ahead.

CEOs surveyed by Gartner indicated that IT is going to be more important in the next decade because they’re making a strategic push to unlock the value of information in the enterprise. That demands data quality, data governance and ultimately an overall information governance strategy, said Anne Lapkin, another Gartner analyst.

“Technology only plays a small part. So you can have a policy engine, but it won’t write the policies for you. The point of your governance process is to ensure that the right decisions are being made around how your information is captured and the quality is maintained,” Lapkin said. “So anyone who talks about information governance is really talking about information management overall, which is essentially the way you make decisions about information.”

Better information management might enable enterprises to better understand their customers. For example, Lapkin said, insurance companies have big data-quality problems.

"Your insurance company doesn't know that the life insurance policy and the three car policies and the summer home and boat policy is owned by the same person because they have tended to be very product-centric with each type of policy having its own underwriting and systems," she said. "For insurance companies to pull together a consistent view of their customer and who you are in terms of their relationship to you is very difficult."

With consistent customer information, an insurance company should be able to more easily sell additional policies to customers or create entirely new policies.

Management challenges abound within an information governance framework

"Enterprises can't even decide who is responsible for data," Logan said. "Who gets to give the go-ahead to delete things? People are asking, 'Do we need to save instant messages? For how long?' Lawyers refuse to make decisions. . . . So who takes responsibility and who doesn't? 'Why can't we just search this stuff and put it in nice buckets?' People don't really understand the semantic issues, so there's no easy technology solution."

Businesses are hungry for answers to these sorts of questions, but even when an information governance policy calls for data to be deleted, new challenges arise.

"People are shocked to learn that they can't retire systems, that although they put in a new ERP system, they may still have some legacy data and need to have the code to continue running it," Logan said.

Still, there are methods to tackling information governance. It's not an impossible task, and there are answers.

What about saving instant messages?

"Our advice is simple," Logan said. "Don't."

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Developing an information governance strategy: tips on getting started

By Chris Maxcer, SearchContentManagement.com Contributor

Because information governance is a new and evolving discipline, getting started can seem particularly daunting – especially when information is in various states of cleanliness and consistency across an organization. Worse yet, new types of unstructured information aren't waiting for a governance plan before bursting onto the scene.

With so many moving targets, information governance best practices may not all be applicable to an individual organization. But they can help a fledgling information governance team illuminate areas of opportunity and create both strategic and tactical plans, according to industry analysts.

"Picking the right place to start is difficult and also different for every organization," said Barclay Blair, president and founder of consulting and professional services firm ViaLumina Group. But he added that an information governance strategy doesn't have to begin with a mass remediation of existing content. "Many companies unfortunately do view that as the first step," Blair said. "Given that it can feel like stepping off a ledge, it makes sense that their information governance projects are often paralyzed."

Blair recommended that organizations focus at the outset on "building the environment they want to move toward." The foundational elements of an information governance framework should come first, he said – for example, agreeing on governance policies, procedures and structures, plus a technology strategy to support them. Those elements then need to be put in place, both within the IT environment and the organization as a whole – a step that involves training and change management processes.

After that, content cleanup can be done "in an ordered and selective way" as the new policies and procedures are implemented, Blair said. That isn't the end of it, though: Successful information governance is an ongoing process. "You're never 'finished,'" he noted.

Force-feeding an information governance strategy not a recipe for success

Blair and other analysts agree on one thing: that an information governance strategy needs to be customized to meet the unique needs of a company.

“The key recommendation I hear again and again from those who have been successful is, Don’t pick a governance program that has worked for someone else and try to force-feed it into your company,” said Rob Karel, a data management analyst at Forrester Research Inc. “If you’re a highly decentralized organization with lines of business that operate independently and have their own IT, building a mother-ship organization to tell all those decentralized lines of business what to do will never work.”

Instead, Karel suggested identifying governance advocates within each of the business units and getting them to work together on a cross-functional basis. Looking for similar initiatives that have worked in the past is also a good strategy, he said. For example, if your company has a successful data privacy program that cuts across all lines of business, model your information governance process on it. “Ride their coattails,” Karel advised.

Information governance plans that start off on the wrong foot often have something in common: a pitch that asks employees to change operating processes or give up something they use for the greater good. As a result, “information governance all too often starts from a position of conflict,” Karel said, adding that a better approach is to create a governance program “that solves for everyone’s priorities, not just one group’s.”

Getting everyone on the same page is where executive sponsors and steering committees come into the picture. “In the end, it’s not the front-line data governance team that figures out what’s a priority,” Karel said. “Their job is to build the business case and provide options based on business benefits and risk, and then let the executive steering committee make the hard decisions.”

Information governance strategy endgame: What are your business goals?

Another thing to keep in mind is the end goal of an information governance strategy. “When companies come to us and say they’re going to manage information better, there’s a question I always ask,” said Anne Lapkin, an analyst at Gartner Inc. Her question: “What material business outcome is going to be improved if you start managing information better?”

Clients often “look at me as if I’ve grown a second head,” Lapkin said. But, she added, information governance programs tend to fail if they’re too broadly scoped and don’t have clear goals or metrics for measuring performance. To get backing from senior executives and acceptance by business users, you must be able to show that a governance program will lead to specific business improvements – even, she joked, if the end result might simply be “that your CEO won’t go to jail.”

In a similar vein, Barry Murphy, an information governance consultant and CEO of the online publication eDiscovery Journal, recommended narrowing the field to get started on information governance. “Focus on a specific pain,” Murphy said, citing areas such as electronic discovery and compliance management where a well-designed information governance policy can provide clear business benefits while not bogging you down in an all-encompassing initiative.

Some companies hire consultants to do the job of developing an information governance strategy for them, a move that can backfire under the wrong assumptions.

“What you don’t want to do is have someone come in and set up your governance program for you,” Lapkin said. “They can help you set up the structure, but work on it with them as a blended team, shoulder to shoulder, so that when they leave you can keep going.”

There’s also the question of when and how information governance software enters the picture.

The answer depends on what kind of information management issues you’re looking to address, according to Lapkin. “If you have a master data management problem, there are

tools for that," she said. "If you have an access control or policy control problem or a records management problem, there are tools for that. [But] there is no one tool that does information governance – it's too complex and multifaceted."

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Information governance policy issue: Who owns a governance program?

By Chris Maxcer, SearchContentManagement.com Contributor

Because successful information governance efforts are ongoing programs rather than projects with finite endings, the question of ownership is an elemental one. Someone has to secure funding, make the difficult decisions and ultimately take responsibility for an organization's information governance policy development and enforcement processes.

In certain situations the legal department can provide an easy starting point, but the process still demands some careful thinking.

"In risk-averse or highly litigious companies, the legal department should own the information governance program, but they should hire an information management person at a high level," said Debra Logan, an enterprise information management and governance analyst Gartner Inc. "Lawyers understand the risk and need and they will delegate responsibility – they have a hammer and see the nails that are sticking up."

When an information governance program is owned by a legal department, its shape tends to be focused on hunkering down to mitigate risk rather than also being open to business value, she said.

"We've also seen other ownership succeed in companies where data gathering costs a lot – like in oil and gas exploration. So we see these industries put geophysicists in charge of information management because there's real business value they can demonstrate," Logan said. Gartner has seen less traditional owners in financial services and pharmaceutical companies, too.

For most companies, though, questions of ownership are rarely clear.

"Many executives mistakenly assume that the person on the management team with 'information' in his or her title is taking care of the information management problem," said Barclay Blair, president and founder of consulting and professional services firm ViaLumina

Group. "However, while most CIOs view infrastructure – software, hardware, cables – as their problem, they consider the information flowing through that infrastructure to be someone else's problem – usually the people who created the information. On the flip side, most group managers say that they do not have the authority, knowledge or money to control what happens in IT."

Information governance policy needs can influence ownership strategies

"Ownership of governance depends on the need, pain or problem that it's slated to address. Sometimes it's the risk management organization. Sometimes it's marketing. Sometimes the CEO is actually saying 'Clean this up,'" said Jill Dyche, a partner and co-founder of Baseline Consulting Group Inc. "In any of these cases, the ownership is temporary: Governance should ultimately be cross-functional and systemic."

The simplest answer would seem to be insisting that business unit own the information governance framework because they derive value from information. That's not happening.

"The executive sponsor more often than not ends up being the CIO or someone downstream," said Rob Karel, principal analyst for data management at Forrester Research Inc. "IT is often the first group that has shared cross-enterprise visibility because they are building shared architectures and services to support multiple lines of business. So very often it's the CIO who 'gets' it first. They can be evangelists or the sponsor, but what they can't do to ensure success is own the results."

CIOs still need to work with their C-level peers, to take ownership and accountability and open up resources. Business stakeholders need to articulate the impact and opportunities that high-quality trusted information can deliver – and that collaboration between business and IT is what will make an information governance strategy successful, Karel added.

So, why doesn't a records and information management group own the information governance process? They can and do.

"The successful records and information management teams all live under the CIO and they play the role of bringing the business view to the information governance program," said

Barry Murphy, an information governance consultant and CEO of the online publication eDiscovery Journal. "They understand how users consume information, how they classify and store it, and they can go to legal and describe the regulations and decisions legal needs to make. We've seen too often that if legal writes the policy, it's 45 pages of legalese."

CIOs can get a budget and lean on legal for budget approval, Murphy added.

"When legal owns information governance, it's usually very e-discovery-centric and is about the information that goes out to law firms – not business information that exists and the risk within it," he said.

Once an organization decides who is ultimately responsible for an information governance program, the next step is to get people working – but these team structures are rife with pitfalls.

"Very often people will set up elaborate data structures and data stewards and policy documents around how data stewards are supposed to behave, and then say, 'We recognize that they have day jobs, so we won't measure them on their performance with the data,'" said Gartner analyst Anne Lapkin. "Well, if you do this, you've just guaranteed they won't take information governance seriously."

Smart organizations, Lapkin says, should write people's data quality and data stewardship obligations into their job descriptions and make it part of their performance metrics. This doesn't mean rewriting everyone's job descriptions in a massive change.

"Start by finding the minimum you have to do to have an impact, and then you move out from there," Lapkin said. "The worst thing you can do is to start out by setting up an elaborate structure and then expecting data quality to automatically improve."

The culture conundrum and its effect on information governance policy

Perhaps the most daunting issue for an information governance program is a well-entrenched company culture.

“Implementing information governance into the culture is much harder than implementing information governance technology,” Blair said. “For many years organizations have effectively allowed knowledge workers to create, use, retain and destroy digital information with almost no enforced rules or effective controls. Information governance seeks to change that. It is not an easy change.”

“Just think about how you personally view your email at work. Even the most enlightened information governance practitioners probably feel a stab of angst at the idea of someone – or some policy – dictating how they manage their email. Multiply this feeling across hundreds or thousands of less information-governance-enlightened employees, and the change management challenge becomes clear,” Blair said.

Make sure an information governance strategy fits within your existing culture, rather than using data governance as a vehicle to change the culture, Dyche said.

“Show me a data governance program that’s too disruptive, and I’ll show you one that doesn’t get traction,” she said. “Know enough about your culture to understand whether it relies on top-down decisions or bottom-up action, and design the data governance program so that you can socialize it into the culture as opposed to making cultural exceptions to enact data governance.”

However, Murphy countered that simply raising awareness of issues has the power to shape culture.

“Organizations that get policy right tend to shape a culture so that everyone is aware of the risks and their duties in managing information,” he said. “So the creation of a policy around Twitter or Facebook for work purposes will get people thinking. There needs to be an awareness of acceptable policy, and too few don’t create acceptable use policies or don’t create realistic ones.”

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Building the business case for an information governance process

By Chris Maxcer, SearchContentManagement.com Contributor

Articulating a general business case for an information governance program can be tough, especially when you have to explain that governance efforts never really end. Actually calculating a demonstrable return on investment (ROI) is even more difficult. Still, analysts who focus on governance issues detailed some strategies for shaping a business case and winning approval for information governance initiatives.

According to Barclay Blair, president and founder of consulting and professional services firm ViaLumina Group, there are two basic “plots” to the information governance business case story.

The first is the “faster, better, cheaper” angle, Blair said, adding that a well-designed information governance process can help organizations speed up decision making, new product development and other business tasks and can also make business processes more efficient.

And the second one? “Fear, uncertainty and doubt,” he said. That focuses on the risk management side of information governance, which has been “a relatively easy story to tell in the past few years” due to business failures and high-profile court cases, Blair noted. But he offered a note of caution: “Don’t overuse it. Many in the information governance field are guilty of over-relying on the ‘sky is falling’ argument to make their point.”

Both approaches do have merit, Blair said – and mixing them may be the most effective way to win broad support for an information governance strategy. “The key is to tailor the story to the audience and tell it using practical, concrete examples,” he advised. “Business units that drive 80% of the company’s profits may not care as much about risk as the compliance department. And the litigation team may not care as much about cutting information management costs as the CFO.”

State your case for an information governance process in business terms

Many information governance efforts never have a chance to get off the ground because of disconnects between the IT department and business units, said Rob Karel, principal analyst for data management at Forrester Research Inc.

For example, telling business executives that an information governance program is needed because a certain percentage of the documents, records and other unstructured content in an organization's systems is duplicated "doesn't speak to them in their language," Karel said. But he added that they might be very interested if the message focused on the business impact of the duplication, such as excess costs or potential regulatory compliance issues.

"Most people just don't think the business case through," said Gartner Inc. analyst Anne Lapkin. She cited an example similar to Karel's from a client engagement in which the members of an IT team said they had been unable to get backing for a governance and data quality project aimed at making information about the company's products consistent across different systems, despite "banging on doors for five years."

The problem, Lapkin found out during the conversation, is that they weren't tying the lack of a consistent information governance policy to any business problems. After she asked them about that, one member of the team said a new CEO was pushing for more cross-selling of different products to customers – a directive that could be hard to meet without consistent information. That created the opportunity to sell business executives on the governance effort by raising the specter that they wouldn't get their annual bonuses without it, Lapkin said.

Barry Murphy, an information governance consultant who also is CEO of the online publication eDiscovery Journal, said that efforts to build a business case can suffer from information governance's inherent lack of sexiness. In addition, executives weighing an information governance process may look at some promised savings as potentially ephemeral. "If I do a business case, it's typically based on cost savings or risk mitigation, and just because I'm going to save on storage costs, it doesn't mean I won't buy more storage," Murphy said. "So there's some cynicism from the business."

Long-term ROI may complicate the information governance business case

Even senior IT executives may ignore a carefully crafted information governance business case showing a projected ROI over a period of several years in favor of initiatives that promise much faster returns, according to Murphy. "I've had CIOs say, 'Don't even talk about what's going to benefit the company in three years – I'll be gone in three years,'" he said.

Murphy added that when CIOs do act on proposals to create an information governance framework, it's often after their organizations have already felt the pain of governance shortcomings, such as difficulty in meeting electronic discovery requirements during litigation. In such cases, he said, "a CIO can be under intense pressure, and their mandate is literally, 'Make sure that never happens again.'"

One other possible tactic is to eschew an ROI calculation altogether. Preparing one "can take longer than actually launching an initial effort and proving its value," said Jill Dyche, a partner and co-founder of Baseline Consulting Group Inc.

Most companies don't have sophisticated enough processes to measure the potential ROI of data and information governance programs up front, Dyche added. As a result, she said, it often is "better just to design a solid approach, apply it to a business problem and then measure the improvements it engenders."

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