The World of Information Governance

Society of Corporate Compliance and Ethics
Maggi Johnsen, CRM
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  - Corporate Governance Oversight Council (CGOC)
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What is Information Governance (IG)?

Information Governance is the specification of decision rights and an accountability framework to encourage desirable behavior in the valuation, creation, storage, use, archival retention (author substitution), and deletion of information. It includes the processes, roles, standards and metrics that ensure the effective and efficient use of information in enabling an organization to achieve its goals.

-- Gartner

Information Management is defined as the means by which an organisation plans, identifies, creates, receives, collects, organises, governs, secures, uses, controls, disseminates, exchanges, maintains, preserves and disposes of its information; as well as any means through which the organisation ensures that the value of that information is identified and exploited to its fullest extent.

-- Queensland (Australia) Government

What Might Lead To An IG Failure?

- Scarcity of behavior-based corporate policies standards
- Lack of clarity around roles and responsibilities
- Inadequate information governance processes and controls
- Minimal effective technologies that provide proper, repeatable categorization and organization of unstructured information
- Lack of recognition that not all information has equal value
What Challenges Do IG Programs Mitigate?

- Inadequate internal accountability
- Weakened capacity for informed decision-making
- Increased legal, financial, or reputational risks
- Reduced ability to assess information governance program impacts
- Reduced employee effectiveness and efficiency
- Increased administrative costs
- Wasted technology investments
- Gaps in the organization’s corporate memory

What Models and Standards Are Available?

- ARMA Generally Accepted Recordkeeping Principles (GARP®)
- Corporate Governance Oversight Council (CGOC) Information Lifecycle Governance Model
- International Organization of Standardization (ISO)
  - ISO 15489 – Information and documentation – Records management
  - ISO 16175 – Information and documentation – Principles and functional requirements for records in electronic office environments
- MIKE 2.0 (Method for an Integrated Knowledge Environment)
## Generally Accepted Recordkeeping Principles (GARP®)

<table>
<thead>
<tr>
<th>Principle</th>
<th>Definition</th>
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<tbody>
<tr>
<td>A</td>
<td>Accountability</td>
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<tr>
<td>T</td>
<td>Transparency</td>
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<tr>
<td>I</td>
<td>Integrity</td>
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<td>P</td>
<td>Protection</td>
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<td>C</td>
<td>Compliance</td>
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<tr>
<td>A</td>
<td>Availability</td>
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<td>R</td>
<td>Retention</td>
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<td>D</td>
<td>Disposal</td>
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</tbody>
</table>

### GARP® Maturity Model

<table>
<thead>
<tr>
<th>Principle</th>
<th>Level 1: Substandard</th>
<th>Level 2: In Development</th>
<th>Level 3: Essential</th>
<th>Level 4: Proactive</th>
<th>Level 5: Transformational</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accountability</td>
<td>No senior executive (or person of comparable authority) is responsible for the records management program...</td>
<td>No senior executive (or person of comparable authority) is involved in the records management program.</td>
<td>The records manager is an officer of the organization and is responsible for the tactical operation of the ongoing program on an organization-wide basis.</td>
<td>Continuous update of duties and responsibilities, automatic employee transition alerts.</td>
<td>The organization’s senior management and its governing board place great emphasis on the importance of the program.</td>
</tr>
<tr>
<td>Transparency</td>
<td>It is difficult to obtain information about the organization or its records in a timely fashion.</td>
<td>The organization realizes that some degree of transparency is important in its recordkeeping for business or regulatory needs.</td>
<td>Transparency in record-keeping is taken seriously and information is readily and systematically available when needed.</td>
<td>Transparency is an essential part of the corporate culture and is emphasized in training.</td>
<td>The organization’s senior management considers transparency as a key component of information governance.</td>
</tr>
<tr>
<td>Integrity</td>
<td>There are no systematic audits or defined processes for showing the origin and authenticity of a record.</td>
<td>Some organizational records are stored with their respective metadata that demonstrate authenticity; however, no formal process is defined for metadata storage and chain of custody.</td>
<td>The organization has a formal process to ensure that the required level of authenticity and chain of custody can be applied to business systems and processes.</td>
<td>There is a clear definition of metadata requirements for all systems, business applications, and paper records that are needed to ensure the authenticity of records.</td>
<td>There is a formal, defined process for introducing new record-generating systems and the capture of their metadata and other authority requirements, including chain of custody.</td>
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<tr>
<td>Compliance</td>
<td>There is no clear definition of the records the organization is obligated to keep.</td>
<td>The organization has identified the rules and regulations that govern its business and introduced some compliance policies and recordkeeping practices that ensure the adequacy around those policies.</td>
<td>The organization has identified all relevant compliance laws and regulations.</td>
<td>The organization has implemented systems to capture and protect records.</td>
<td>The importance of compliance and the role of records and information is clearly recognized at the senior management and board levels.</td>
</tr>
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Corporate Governance Oversight Council (CGOC) Information Governance Risks

<table>
<thead>
<tr>
<th>Process</th>
<th>Risk Posed by Process</th>
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</thead>
<tbody>
<tr>
<td>A</td>
<td>Employee on Legal Hold</td>
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<tr>
<td>B</td>
<td>Hold Publication</td>
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<tr>
<td>C</td>
<td>Legal Interviews</td>
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<tr>
<td>D</td>
<td>Evidence Collection</td>
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<tr>
<td>E</td>
<td>Evidence Analysis and Cost Controls</td>
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<tr>
<td>F</td>
<td>Legal Record</td>
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<tr>
<td>G</td>
<td>Staff Retention Schedule and Taxonomy</td>
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<tr>
<td>H</td>
<td>IT Departmental Information Practices</td>
</tr>
<tr>
<td>I</td>
<td>Privacy and Data Protection</td>
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<tr>
<td>J</td>
<td>Data Source Cataloging and Stewardship</td>
</tr>
<tr>
<td>K</td>
<td>System Provisioning</td>
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<td>L</td>
<td>Disposal and Decommissioning</td>
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<tr>
<td>M</td>
<td>Legacy Data Management</td>
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<tr>
<td>N</td>
<td>Storage Alignment</td>
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<tr>
<td>O</td>
<td>Audit</td>
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</tbody>
</table>

Potential Impact

- **High risk**: Requires constant monitoring and review, immediate escalation on failure or impending failure. 90% likelihood.
- **Moderate risk**: Requires frequent monitoring to prevent and detect; costs to correct or mitigate. Between 10% - 50% likelihood.
- **Low risk**: Does not require constant monitoring and is easy to prevent, detect, and correct; less than 10% likelihood.

Likelihood to Occur

- **A**: Employee on Legal Hold
- **B**: Hold Publication
- **C**: Legal Interviews
- **D**: Evidence Collection
- **E**: Evidence Analysis and Cost Controls
- **F**: Legal Record
- **G**: Staff Retention Schedule and Taxonomy
- **H**: IT Departmental Information Practices
- **I**: Privacy and Data Protection
- **J**: Data Source Cataloging and Stewardship
- **K**: System Provisioning
- **L**: Disposal and Decommissioning
- **M**: Legacy Data Management
- **N**: Storage Alignment
- **O**: Audit

Source: Compliance, Governance and Oversight Council (CGOC)
CGOC Information Governance Maturity Model

<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td><strong>H.</strong> Master Retention Schedule and Taxonomy</td>
<td>Define retention periods only for physical records.</td>
<td>Updated retention schedule for physical and electronic records.</td>
<td>Established retention periods for all information; define country/jurisdiction specific schedules (without over- or under-retention of records).</td>
<td>Value-based retention schedules are published appropriate for business, country, operations, library of country protocols for discovery, privacy, retention. Schedules align with and are systematically used to dispose of production and backup data (whether electronic, structured, unstructured, electronic, physical, leads to access management information.</td>
</tr>
<tr>
<td><strong>I.</strong> Departmental Information Practices</td>
<td>No knowledge of actual procedures; no inventory of information capturing location, use, or value.</td>
<td>Conduct inventory of departmental practice and information. Network of retention coordinators exists but is focused on physical records management.</td>
<td>Departmental records coordinators work with their line of business to define what information is of value for how long and where it is retained. This leads more comprehensive retention schedules that incorporate business value in addition to regulatory requirements. Enable change request processes to members of the business and system owners.</td>
<td>Retention schedules are systematically used to dispose of production and backup data (whether electronic, structured, unstructured, electronic, physical, leads to access management information. Level 3 capabilities.</td>
</tr>
<tr>
<td><strong>J.</strong> Privacy and Data Protection</td>
<td>Each country and business keeps a list of applicable privacy rules; implementation is done locally and informally.</td>
<td>Privacy and data protection requirements are included in the privacy officer and corporate policies are published on the internet; implementation decisions are left to local business and system owners.</td>
<td>There is an accurate catalog of privacy laws and policies by country accessible to privacy. Policy communications are routine and semi-automated to records, business, and system stakeholders. Critical systems are provisioned with access controls.</td>
<td>Systems are provisioned with access, masking, and controls to protect privacy; information classifications in business, legal, and IT databases are confidential; access to privacy controls in real-time; changes in law are applied to systems within 7 days. Changes in law are integrated into protocols governing data and privacy.</td>
</tr>
</tbody>
</table>

Source: Compliance, Governance and Oversight Council (CGOC)

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International Organization of Standardization (ISO)

- ISO 15489 – Information and documentation – Records management
- ISO 16175 – Information and documentation – Principles and functional requirements for records in electronic office environments

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MIKE2.0

- MIKE2.0, Method for an Integrated Knowledge Environment,
- Open-source methodology for Enterprise Information Management
- Framework for information management best practices – linked into common business issues and technology-specific solutions. Its scope covers the complete information supply chain within an organization: from how it is created, accessed, presented and used in decision-making to how it is kept secure, stored and destroyed

MIKE2.0 Core Solutions

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Composite Solutions
- Information Management Strategy
- Data-Driven IT Transformation
- Information Sharing
- Enterprise 2.0
- Agile Information Development
- Open Sustainability

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PHASE 1: Business Assessment and Strategy Definition Blueprint

- Activity 1: Strategic Mobilization
  - 1.1 Objective
  - 1.2 Major Deliverables
  - 1.3 Tasks
    - 1.3.1 Conduct Initial Direction Setting with Sponsor
    - 1.3.2 Meet with Key Stakeholders
    - 1.3.3 Begin Collection of Artifacts
    - 1.3.4 Understanding Current State of Project Activities
    - 1.3.5 Establish Charter for Information Management Plan
    - 1.3.6 Introduce Overall MIKE2.0 Program Plan
  - 1.4 Core Support Assets
  - 1.5 Yellow Flags
  - 1.6 Key Resource Requirements
An Information Governance Program

Case Study:
ERAN Services, Inc.

ERAN Services’ Program Roadmap

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ERAN Services’ Organizational Structure

**ERAN Services’ GARP® Program Assessment**

<table>
<thead>
<tr>
<th>INFORMATION GOVERNANCE THEME</th>
<th>Accountability</th>
<th>Frequency</th>
<th>Integrity</th>
<th>Privacy</th>
<th>Compliance</th>
<th>Availability</th>
<th>Retention</th>
<th>Operation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Governance Structure / Strategy</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>2.5</td>
<td>3</td>
<td></td>
<td></td>
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<tr>
<td>2. Laws and Regulations Inventory</td>
<td>3</td>
<td></td>
<td>2.5</td>
<td></td>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Information Governance Policies / Standards and Procedures</td>
<td>2</td>
<td></td>
<td>1.5</td>
<td></td>
<td>3</td>
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<tr>
<td>4. Retention Schedule</td>
<td>4</td>
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<td>2</td>
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<tr>
<td>5. Copyright Compliance</td>
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<tr>
<td>6. Data Privacy</td>
<td>3.5</td>
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<td>4</td>
<td></td>
<td>3</td>
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<tr>
<td>7. Litigation Support</td>
<td>4</td>
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<td>3</td>
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<tr>
<td>8. Records Management Processes</td>
<td>2</td>
<td></td>
<td>2.4</td>
<td>1.5</td>
<td>3</td>
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<tr>
<td>9. Corporate Archives</td>
<td>2.5</td>
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<td>0</td>
<td></td>
<td>3</td>
<td></td>
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<td></td>
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<tr>
<td>10. Vital Records and Business Continuity</td>
<td>2.5</td>
<td>2.5</td>
<td>2.5</td>
<td>2.5</td>
<td>2.5</td>
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<tr>
<td>11. Technology</td>
<td>2</td>
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<tr>
<td>Average Maturity Score</td>
<td>2.62</td>
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ERAN Services’ Information Governance Model

Create, Access, Use, Maintain, Dispose

- System / Application Governance
- Information Ownership
- Information Organization and Taxonomy
- Information Retention / Disposal
- Information Protection (Privacy and Confidentiality)

Reliability, Authenticity, Integrity, Usability

ERAN Services’ Program Elements

<table>
<thead>
<tr>
<th>Information Governance</th>
<th>Legal and Regulatory Requirements</th>
<th>Corporate Policies and Standards</th>
<th>Industry Standards</th>
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Program Elements

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<thead>
<tr>
<th>Copyright/Compliance</th>
<th>Data Privacy / Confidentiality</th>
<th>Litigation Support</th>
<th>Records Management</th>
<th>Vital Records Protection and Recovery</th>
<th>Corporate Archives</th>
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Processes and Recordkeeping Systems

<table>
<thead>
<tr>
<th>Classification / Naming</th>
<th>Migration</th>
<th>Protection / Recovery</th>
<th>Retention</th>
<th>Organization / Search</th>
<th>Security / Access</th>
<th>Preservation</th>
<th>Storage</th>
<th>Disposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Taxonomy / File Plan</td>
<td>Business Rules</td>
<td>Metadata Management</td>
<td>Computing Infrastructure</td>
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Take Home Message

- Information Governance is just another important type of governance.
- There are resources available to help you get started.
- Like many of these efforts, it won’t be perfect the first time. It’s the journey that is important – both as evidence that your organization takes information governance seriously and to reap the benefits that an information governance program provides.
Sources and Additional Reading

- MIKE2.org

Food for Thought

Let your Eminence give orders throughout each and every province that a public building be allocated, in which building the magistrate is to store the records, choosing someone to have custody over them so that they may remain uncorrupted and may be found quickly by those requiring them, and let there be among them an archives, and let that which has been neglected in the cities be corrected.

-Emperor Justinian I (reigned 527–565 CE)
(quoted by Baldassare Bonifacio, De Archivis, 1632)
Contact Information

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