

# Creating an Information Governance Roadmap

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Mark Diamond, CEO & Founder, Contoural, Inc.

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Often the most difficult part of an IG program is simply getting started. Even with key stakeholders involved and senior management support, IG steering committees wrestle with a number of questions:

- What's the right size program for the organization?
- What projects should be included?
- In what order should the projects be executed?
- How long will it take?
- Can existing technologies be used or do new systems need to be purchased?
- How much will it cost?
- How much will it save?

These and other questions are best addressed through developing an IG roadmap.

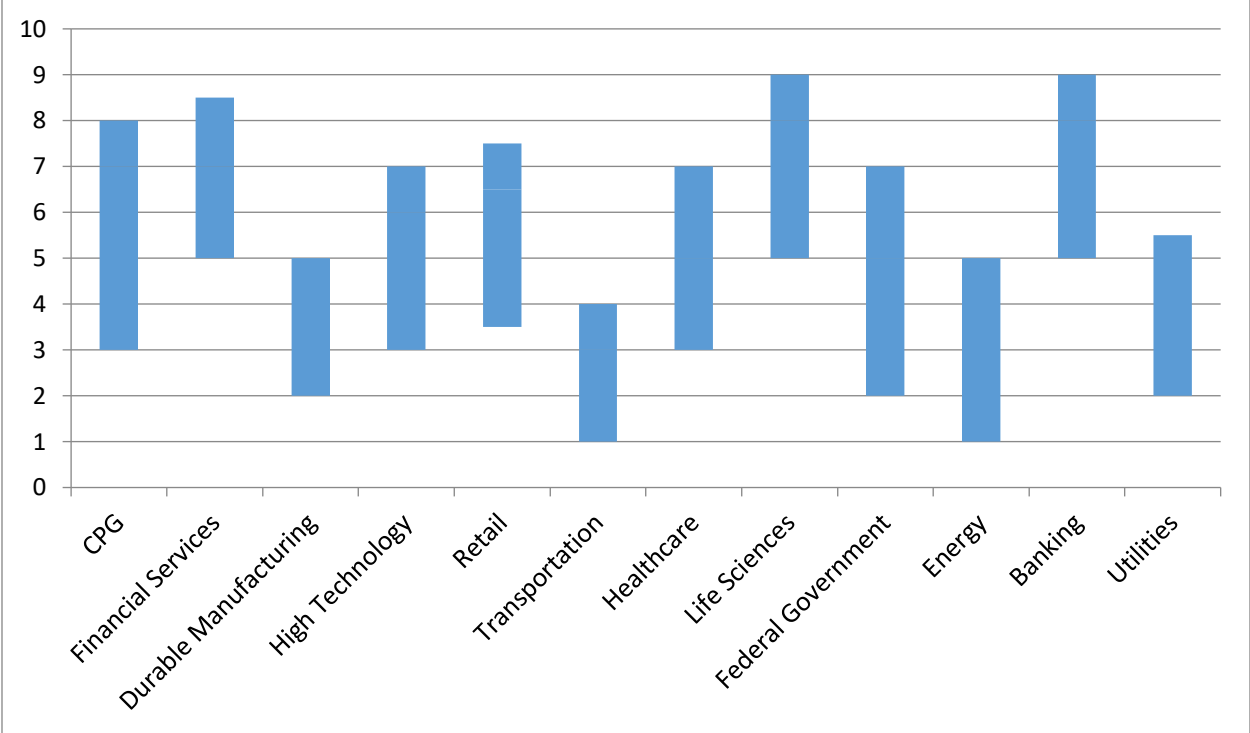
## Take a Divide and Conquer Approach with Wins along the Way

There is a tendency to simply start with a small component and work on that, without worrying about some of the bigger picture details. But even small initiatives run across, and may conflict with, other program elements. Organizations wanting to dispose of files and other unwanted unstructured data, for example, may start with an electronic data deletion project. But before this can be done the records retention schedule may need to be updated. Then someone realizes that the legal hold process should be addressed so information under legal hold is not deleted. Just getting started can be difficult. Avoid creating one single, large project. Rather, to avoid getting stuck, take a big picture view and develop a roadmap that divides projects into smaller, more manageable pieces.

As the strategy is being developed, consider the timeline in which these projects can be completed. The timeline should factor in competing initiatives, funding, and the speed at which the organization can absorb change. Some smaller programs can be executed in a quarter or two. Larger and more complex organizations often have IG program timelines that may span a number of years. Perhaps most important, each project or small group of

projects should offer an organizational “win” in which the enterprise witnesses the benefits of these types of programs. Having wins early and then throughout the process will help build momentum and buy-in, as opposed to experiencing a win at the end of a series of long projects.

### Sports Car, Sedan or Golf Cart – Picking Your Program Maturity



Organizations should consciously target the appropriate level of maturity for their IG program. Technology vendors and law firms often warn of dire consequences of poor IG efforts (and that only their technology or services will avoid these disasters.) In reality, organizations have a wide range of compliance requirements, litigation profiles, privacy risks, cultures, and resources available. A few organizations do indeed need a “sports car” level of program maturity; however, more organizations would be better off with a “sedan” or even “golf cart” level program. It is better to have a well-executed, albeit simpler, approach than a more complex, difficult, and expensive “sports car” target maturity that spends more time in the repair shop than being driven. Senior managers know this to be the case and savvy IG professionals know that targeting the right level of maturity is key.

Take note that maturity varies tremendously across industries. Industries facing more regulatory requirements or higher litigation profiles in general have higher average information governance maturity than those in less regulated industries such as manufacturing. Often senior management is willing to invest in a target maturity level that

is slightly above the average in their industry, but are less interested in having a program that is far above this. This is OK, so long as maturity is properly calibrated.

Make a conscious choice on target maturity based on these factors. When justifying a program, be sure to explain the choice and the rationale behind it.

## IG Frameworks and Standards

Sometimes organizations want to refer to outside IG standards and frameworks to gauge target program maturity. Some of these standards include:

IG Frameworks and Standards	
<p><b>Records Management</b></p> <ul style="list-style-type: none"> <li>▪ Legal and Regulatory Requirements (10K+)</li> <li>▪ Generally Accepted Recordkeeping Principles (GARP)</li> <li>▪ Information Governance Maturity Model (IGMM)</li> <li>▪ Federal Sentencing Guidelines</li> <li>▪ EDRM Information Governance Model</li> <li>▪ ISO 15489-1:2001</li> </ul>	<p><b>eDiscovery</b></p> <ul style="list-style-type: none"> <li>▪ Sedona</li> <li>▪ Sedona Canada</li> <li>▪ EDRM.net</li> <li>▪ Case Law (Pension Committee v. Bank of America, Victor Stanley v. Creative Pipe, Chin v. Port Authority)</li> <li>▪ TREC</li> <li>▪ Practice Direction 31B (UK)</li> </ul>
<p><b>Information Security</b></p> <ul style="list-style-type: none"> <li>▪ FIPS 199</li> <li>▪ ISO 27001, 27002</li> <li>▪ HIPAA</li> <li>▪ General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)</li> <li>▪ Privacy Shield</li> <li>▪ PCI Requirements</li> <li>▪ State Privacy Laws</li> <li>▪ GLBA</li> </ul>	<p><b>Data Storage and IT</b></p> <ul style="list-style-type: none"> <li>▪ ITIL</li> <li>▪ ISO 32000-1 (PDF)</li> <li>▪ CORBA</li> </ul>

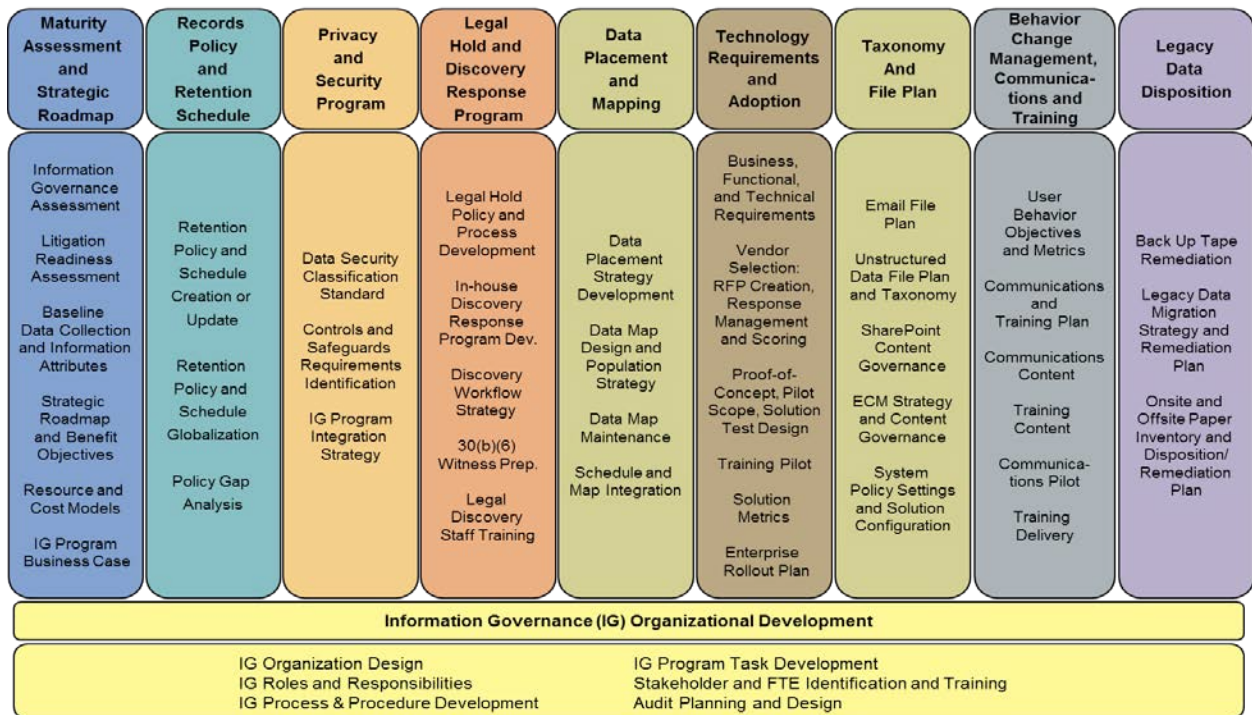
These multiple standards create some challenges:

- Many of the above are only focused on one small piece of IG, such as eDiscovery. No standard or framework addresses all of IG.
- Some are well-defined standards and most are less prescriptive frameworks. IGMM, for example, is at best a framework. It does not provide much prescription on targeting specific levels of maturity.

- Few of these provide any type of objective measurement against current capability.

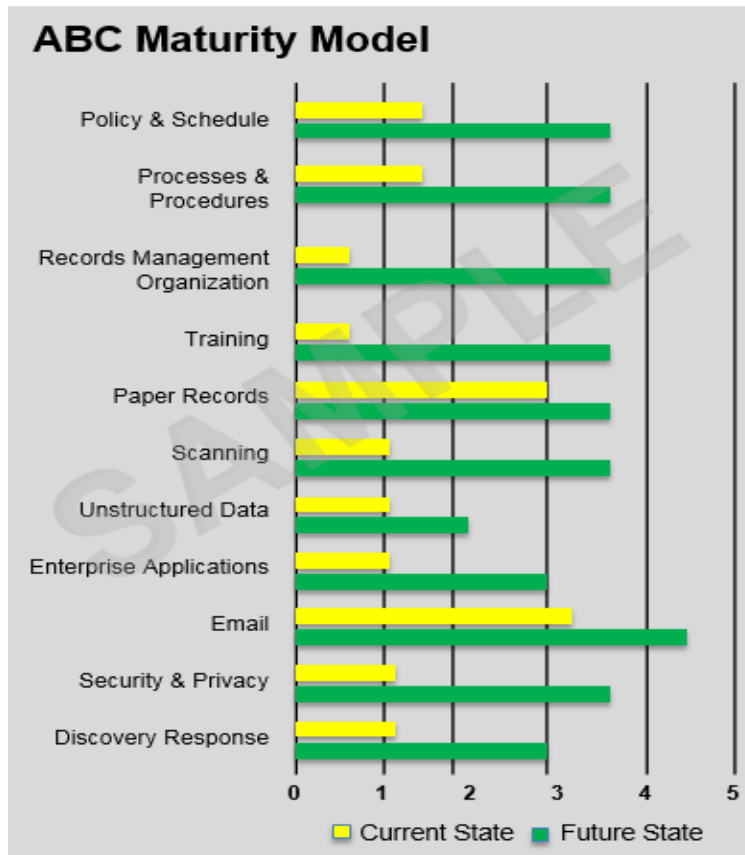
The above standards are useful in examining program elements, such as FIPS 199 for information security. As of today, however, no single standard exists for an overall IG program (and one is not likely to come around in the near future). As a result, organizations often assess their own needs based on a variety of drivers, as well as against peers in their own industry.

## Assessing Current State and Developing a Roadmap



Since the process must begin somewhere, an IG assessment is a good place to start. Before figuring out where to go, a comprehensive understanding of where the current state and how it materialized is needed. This helps when determining where to be in the future.

Even if the general counsel knows, or thinks they know, that the current program is weak, or that the program needs some improvement in certain areas, an IG assessment is key to helping to identify what truly does need improvement, what steps need to be taken to effect the improvement, and who needs to be included in each of the steps. The assessment will help to identify the weak areas and confirm the areas that are a bit stronger. Skipping an IG assessment is like jumping into a lake without knowing what is in it. Issues or employee pain points cannot be properly identified without conducting a thorough assessment.



An IG assessment will provide a holistic, enterprise-wide perspective so that an organization can develop an approach to viewing information as a strategic asset that can support organizational objectives. The assessment can be benchmarked against other organizations in the same industry or organizations of the same size or revenue. This will help determine where the organization’s profile sits – what gaps are acceptable and what needs to be bridged to get to the desired future state.

An IG assessment will take into account the organization’s culture, risk and litigation profile, operational environment, appetite for maintaining a program, user behaviors, and existing infrastructure. One important goal of an assessment is to understand the business needs and actual behavior patterns of employees who create, manage, and destroy records in all formats (paper, electronic and other physical formats). This helps an organization prevent costly mistakes that can occur when organization’s jump into technology solutions without having a good understanding of the business requirements. It also helps an organization formulate a comprehensive program that responds to all the important business drivers – not just a narrow view from one functional perspective.

Recommendation		Priority	Effort (XYZ)	Cost
1	Update/Simplify Policy, Schedule and Procedures to Incorporate Electronic Records Management	High	Medium	\$\$
2	Enhance Records Management Organization and Matrix of Records Coordinators	High	Medium	\$\$-\$
3	Develop Email Management Strategy and Solution Requirements	High	Medium	\$\$\$
4	Develop RIM Behavioral Change Management Strategy, Content Creation and Delivery Vehicles	High	High	\$\$-\$\$\$
5	Unstructured Electronic Data Placement/Management Strategy	High	Low	\$\$
5a	File Share Clean Up/Offices and Centers File Plan Development/Training	High	High	\$\$-\$
5b	Develop Enterprise Content Governance/s File Plan Dev./Training	High	High	\$\$-\$\$\$
5c	Develop Authenticated Electronic Signature Process	Medium	Low	\$\$-\$
6	Evaluate and Implement Enterprise Search Solution	High	Medium	\$\$-\$
7	Legacy Structured Data Strategy and Remediation	High	Medium	\$\$-\$\$\$
8	Security & Privacy Improvements	High	Medium	\$\$-\$
9	Enhance Litigation Tools and Training	Medium	Low	\$
10	Standardize Scanning Guidelines and Processes	Medium	Low	\$\$-\$
11	Develop Integrated Content Data Map for Electronic Information	Medium	High	\$\$-\$
12	Update Desktop Backup Solution	Medium	Low	\$\$-\$\$\$

Information gleaned from the assessment can then be used to create a strategic roadmap that addresses the gaps and provides steps to achieve the desired level of records management, litigation readiness, and the protection of sensitive information. The roadmap provides a clear, detailed project plan for executing the overall IG initiative.

## Additional Information

### About Contoural

Contoural is the largest independent provider of privacy and Information Governance consulting services, providing assessments, records policies and schedules, M365

configuration, behavior change management and training and other strategic services. Selling no products nor providing any “reactive” eDiscovery services the company serves as a trusted advisor to more than 30% of the Fortune 500 as well as numerous small and medium-sized enterprises. Contoural is sponsor of ACC’s Information Governance Network as well as sponsor of ACC’s Legal Operations Network Records Management Toolkit. Additional information is available at [www.contoural.com](http://www.contoural.com).