



Setting the Stage for Automatic Disposition

March 18, 2015

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Why Not...

...Dispose of Redundant, Obsolete & Trivial Information (ROT*)?

It's best practice

- Generally Accepted Recordkeeping Principles
 - Retention
 - Disposition

It's cost effective and reduces business risks

- The Sedona Conference Commentary on Information Governance

* *ROT includes records with expired retention periods*

What are the Barriers for Automatic Disposition?

People

Process

Technology

Barriers for Automatic Disposition: People

- Overcoming skepticism
- Issues with legacy information
- Confusion about big data – keep everything?
- Business unit inaction
- Lack of Information Governance Steering Committee
- Automatic classification
 - Accuracy – is 80% good enough?
 - Stakeholders distrust algorithms

Barriers for Automatic Disposition: Process

Some want to apply the typical physical record disposition process to electronic records:

- [From RM Listserv] Destruction of official records based on the following conditions:
 - The approved retention period has expired
 - Written approval is received from owner
 - Concurrent has been received from legal
- Organizations may have policy but lack supporting procedures and processes

Barriers for Automatic Disposition: Technology

- Can be limited built-in functionality for retention
- Unreliable or non-existent dates to determine retention
- Difficulty implementing event-based retention periods
- Automatic classification
 - Auto-classification tools can be expensive
 - Difficulty identifying representative files for training the tools

Is Automatic Disposition Just Too Difficult?

Success Stories: Global Energy & Petrochemical

People

Started with Executive Committee mandate, then leadership teams, then communicated through various channels

Allowed one year to get the message out

Training is a self-directed web-based tutorial

Process

Legal holds are applied as litigation occurs

Approvals not required

Notifications are not planned

Event-based retention – User selects Record Type from pick list which generates Record Series metadata. User enters close date.

Technology

Popular enterprise records management system for physical and electronic records

Have plans to migrate to a suite of integrated tools, better suited to manage the entire Information Lifecycle, including Records

Success Stories: City of Bellevue WA

People

Raised awareness for RRS and SharePoint content types in context of a game

Incorporated RM into mandatory training on email management

Training on SharePoint 3 Cs = communication, collaboration, and content

Process

Streamlined RRS from 730 to 75 record series

Changed when we were getting “permission” from end of lifecycle to point of declaration

Updated legal hold/release program

Addressed event based retention

Technology

Gimmel Compliance Suite and SharePoint 2010

Success Stories: Mid-Stream Energy Company

People

Filers/deleters vs. pilers

Massive training effort took 9 months, staggered implementation by region

Learned how to tag email with one click; otherwise email is automatically disposed after 120 days

Process

Developed 3 tiered approach for email retention:

Zone 1 – 120 days

Zone 2 Workspace Records – 2 years

Zone 3 – Records Retention Schedule

Event-based retention periods

Technology

OpenText

Extending/integrating to other systems

Focusing on higher risk records first

Emerging Practices from the Success Stories

PEOPLE

- It's going to take some time
- Training and change management are "constant"
- Just because people can abuse/game the system, that's not a good excuse for doing nothing

PROCESS

- Tag information at the front end of the lifecycle
- Establish and enforce business rules such as retention, legal holds
- Take a stand on event-based retention periods
- Approvals and metadata 1) government, 2) leased data

TECHNOLOGY

- Connect systems seamlessly to identify event trigger dates (contacts, HR, etc.)
- 3rd party solutions rather than home grown
- Check if audit log/trail is automatic – is that a requirement?

Setting the Stage for Your Success Story: People

You can't knock down barriers by yourself

- Form an interdisciplinary team / Information Governance Steering Committee
 - Oversee development of standards and policies
 - Harmonize policies and practices
 - Minimize potential policy conflicts and overlapping efforts
- Establish a Records Coordinator network to facilitate disposition, with dotted line authority to the Records Manager / Officer
- Decide not to keep everything, based on risk and value
- Embed change management into all program level activities

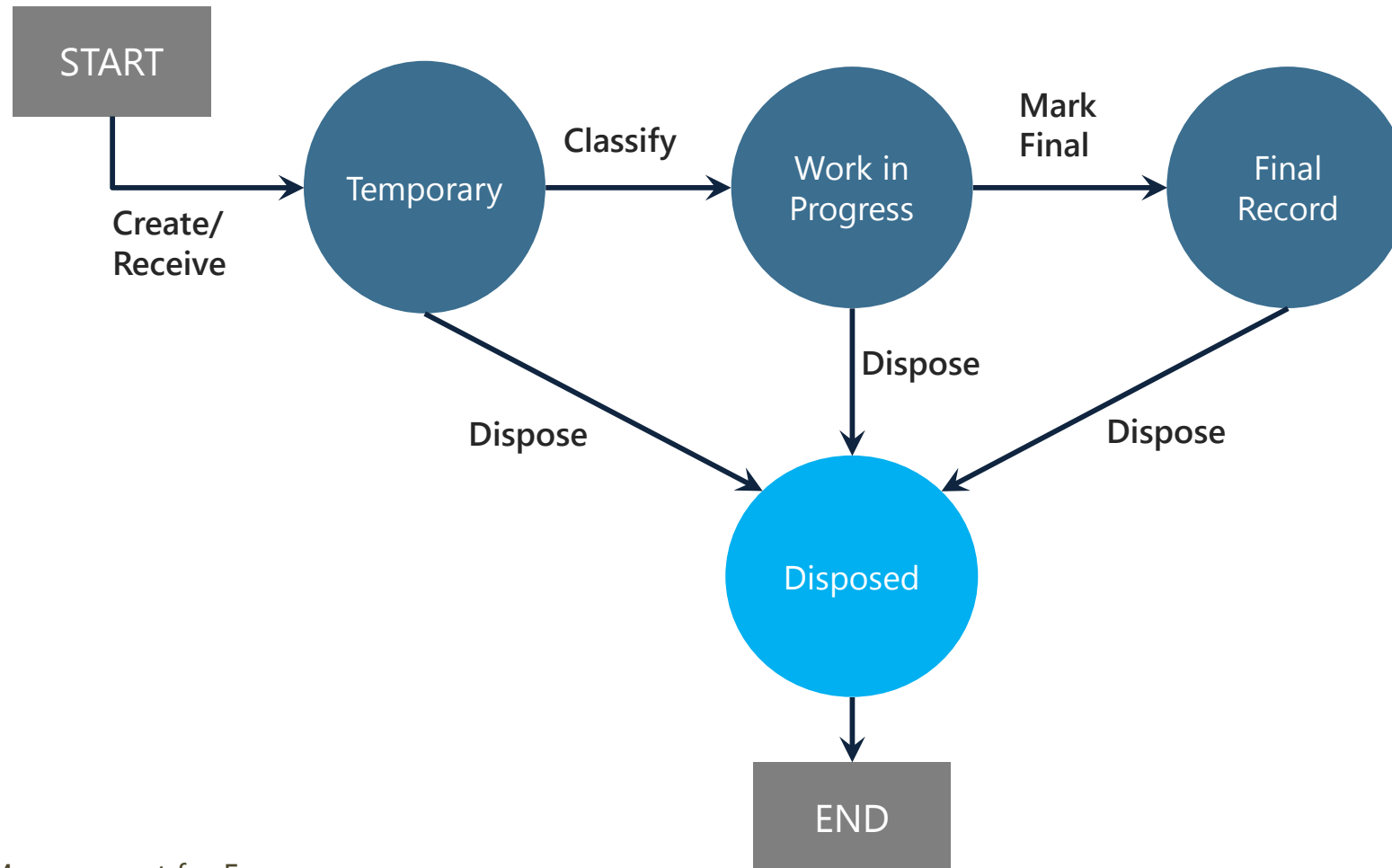
Setting the Stage for Your Success Story: **Process**

Need business rules for consistent retention and effective compliance monitoring

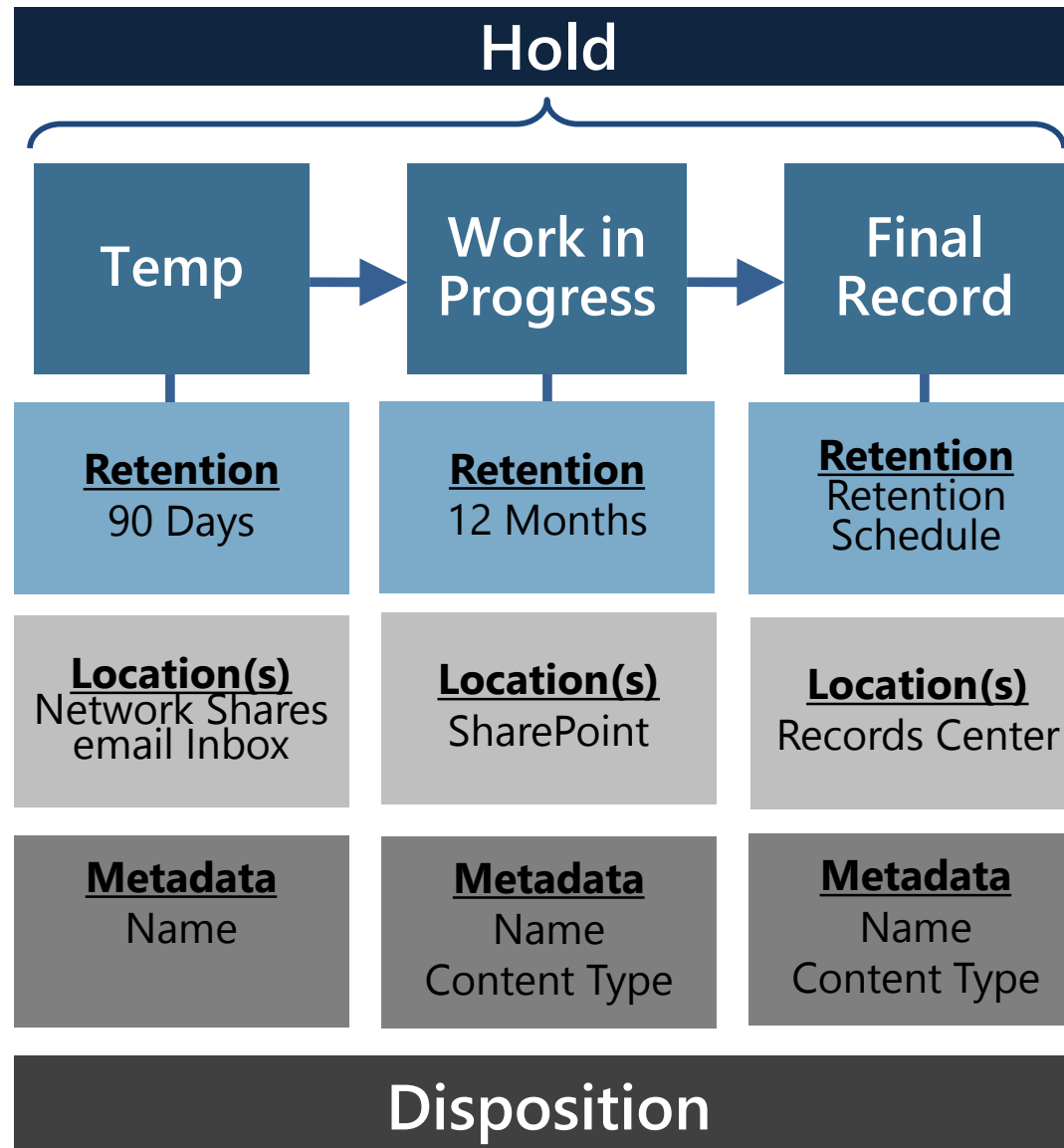
- Update your rules / compliance framework
 - Define an information lifecycle model and associated business rules
 - Simplify existing retention schedule with the big bucket approach
 - Make sure RIM policy is up-to-date and approved
 - Legal hold / release program needs to be in place

Setting the Stage for Your Success Story

Define an Information Lifecycle Model & Associated Business Rules



Lifecycle Business Rules



- Retention
- Location
- Metadata
- Security
- Versions
- Disposition

Setting the Stage for Your Success Story

Simplify existing retention schedule with the big bucket approach

- Same or similar business processes
- Same or similar legal/regulatory requirements
- Maintained for same or similar amount of time



Big Bucket Approach

Fewer / bigger buckets in a RSS

- Easier to manually and automatically classify records for retention and disposition
- Improves ability to consistently retain/dispose of records resulting in less selective destruction
- Simpler is usually better

Setting the Stage for Your Success Story

Make sure RIM policy is up-to-date and approved

- Ownership and responsibility for company information
- Definition of requirements for information lifecycle
- Definition and examples of types of records
- The company's records retention schedule
- Requirements with records retention and disposal
- Definition and importance of preservation hold orders

Automated Disposition Process 1

- Automated when possible and sustainable
- When a piece of content satisfies its retention period, it is expected to be destroyed immediately
- When the destruction of electronically stored content cannot be automated, manual processes are designed

Automated Disposition Process 2

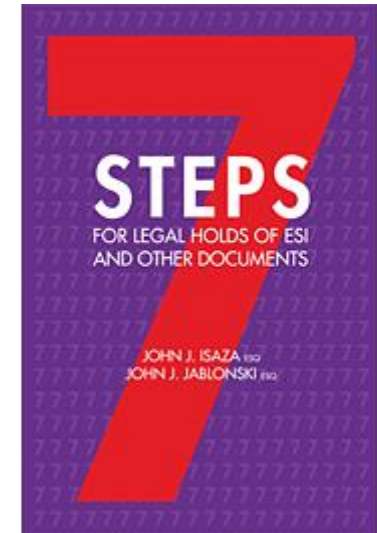
Third Party Destruction

- When third parties are contracted to destroy electronic or physical content, certificates of destruction are recommended and usually include date, time, location, method of destruction and signature of the operator who destroyed the records

Setting the Stage for Your Success Story

Legal hold / release program must be in place

- *7 Steps for Legal Holds of ESI and Other Documents* by John J. Isaza and John Jablonski
- New online course that includes the book *7 Steps for Implementing Legal Holds*
- Available at the ARMA Website



Setting the Stage for Your Success Story: Technology

- Do a pilot
- Easier to implement retention and disposition on a day-forward basis
 - When a new system being procured - get on the procurement team
 - When the organization is migrating to new system is a good time to introduce retention and disposition controls
 - Save email and shared drives for later after you gain experience
- Event-based retention periods can be automated

Setting the Stage for Your Success Story

Start planning for disposal in cloud-based services

- In contracts with cloud providers, document answers to these questions about disposition:
 - How is information destroyed?
 - Are there secure destruction options?
 - How do we confirm disposition takes place on a timely basis and according to our rules?
- Refer to Job Aid for guidance



Questions

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