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Successful Strategies for Managing Ungoverned Data: Lessons Learned from the Remediation Trenches

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Every Company is Fundamentally an Information Company

Information is largely electronic

Office 365

Dropbox

salesforce

Google docs

twitter

facebook

And coming from more sources that ever

The Challenge is: Companies have too much ungoverned data

- They don't know where it is
- They don't know what's in it.

Why is this a problem?

- Makes everything less efficient
- Increases costs (edisco, storage, migration)
- Increased security risk
- Increased regulatory burden (GDPR, NYDFS, CA Privacy Law, etc.)
- Lost leveraging opportunities: Can't get value out of data you know have access to

Remediation Addresses These Problems

- What is remediation?
  - Information governance (IG) process directed at bringing order to information
  - Not merely deletion

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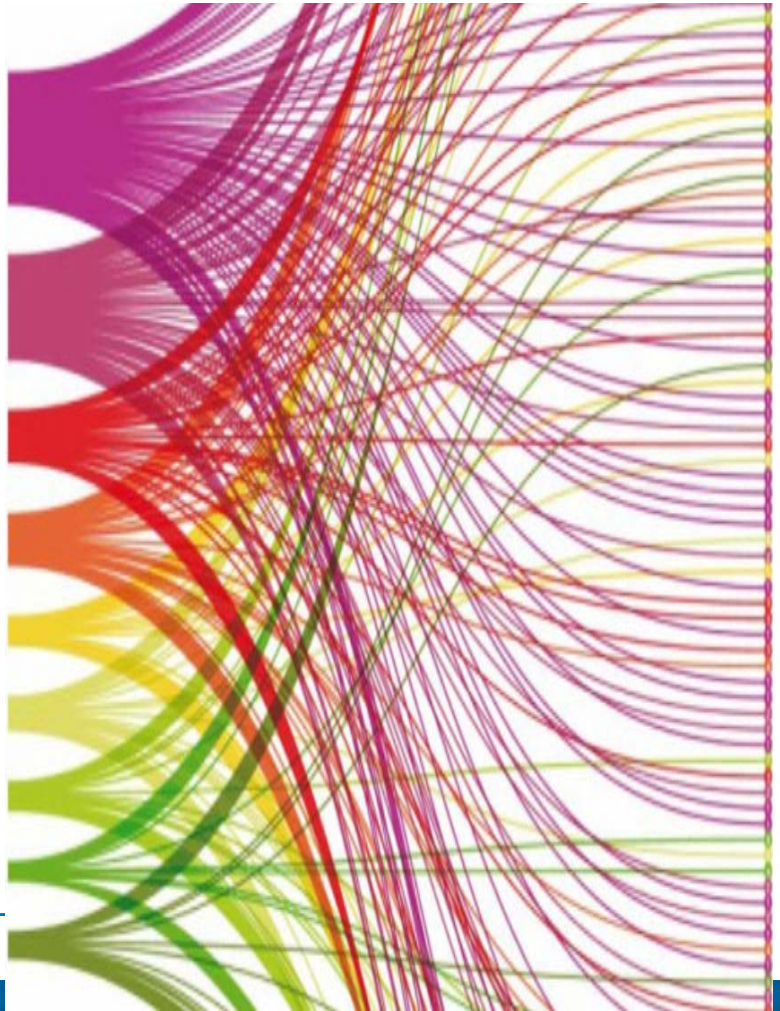
Remediation Addresses These Problems

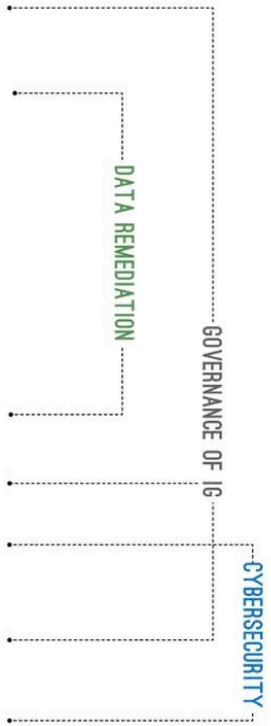
- Focused on overall management of information and enabling critical IG activities
  - Cleaning up information
  - Organizing information
  - Migrating information



The Top 10 IG Projects Underway

IG Projects Organizations Are Doing Or Planning To Do This Year

Content in parentheses indicates year-over-year (YOY) change, if any	Current Rankings (plus YOY)
Updating policies and procedures	1
Data consolidation and cleanup	2 (+1)
Defensible deletion	3 (+2)
Migration of unstructured information from one system to another	4
Scanning paper documents	5 (-3)
Decommissioning an archive or system	6
Implementation of a new corporate governance framework for IG	7
Data loss prevention	8
Implementing legal hold tracking	9
User rights audit and analysis	10



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Projects IG Professionals Would Do if They Had Authority and Budget

Practitioners' Rankings	IG Projects
1	Define and implement a corporate governance framework for IG
2	Update policies and procedures
3	Defensible deletion
4	Moved up 2 spots YOY — Execute a comprehensive legacy data cleanup project
5	Data loss prevention
6	Implement legal hold tracking
7	Execute a big data analytics project

Goals of Remediation

1. Retain information valuable or necessary to meet the organization's **business**, **legal**, or **regulatory** objectives and obligations
2. Ensure that information no longer useful to the organization is deleted in a defensible manner

Key Questions that Drive Remediation

- What are the primary objectives of the organization?
- What information is needed to accomplish those objectives?
- How long is that information useful?
- What do we do with it when it is no longer useful?

A Framework for Remediation

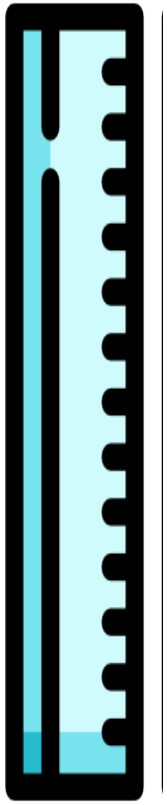
- Gain Visibility
- Develop and Apply a Measuring Stick
- Acting on the Data

Visibility

- In order to act on information, you have to gain visibility into it
- Levels of Visibility
  - Metadata
  - Content
- Lots of tools available to do this
- Buy or make do with what you have?

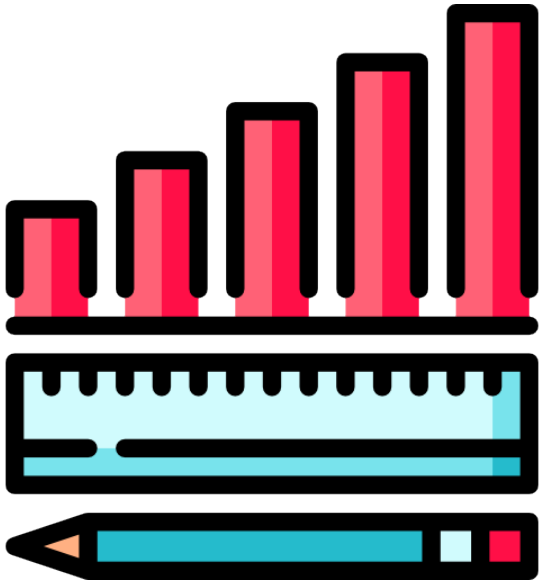
Measuring Stick

- Once you get visibility into your data, you have to have some means of classifying it.
  - What is it?
  - Keep or delete
  - Confidentiality
  - Security



Developing Measuring Sticks

- What are our primary objectives?
- What information do I need to accomplish those objectives?
- The answers to those questions are supposed to be expressed in a records schedule.



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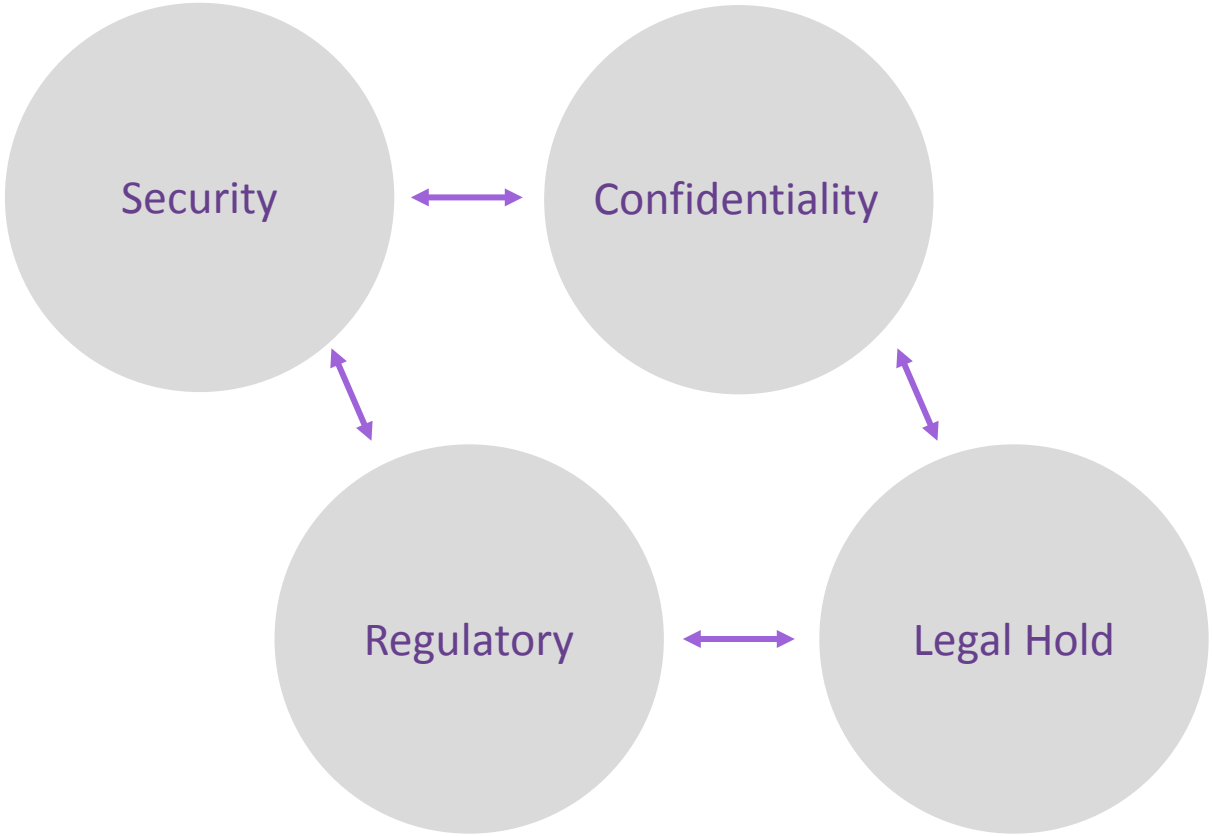
Weaknesses of the Typical Records Schedule

- Much too granular
- Confusing to users
- No efficient way to effectuate compliance
- Lack of compliance and consistency

Modernizing the Records Schedule

- Consolidate and Simplify – Bucketing Approach
- Goal is to design the buckets such that technology can act on data and automatically put it in the right buc
- Then you can remediate to the bucket

Other Measuring Sticks



Acting on the Data

- Find the tool that works for you
  - Lots of options here
  - Decision to buy or make do
  - Understand what it can and can't do
  - May have to start with what you have then build a use case for licensing something better

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Converting the Measuring Stick to Rules that Fit the Tool

- Most tools are Boolean based
  - Exceptions are Valora and ediscovery tools
- Converting rules into search parameters (content and metadata)
- Deciding what to do with the classified data
  - Keep
  - Tag
  - Migrate
  - Quarantine and Quack
  - Delete

Bucketing Approach

Three main ways to get visibility into data

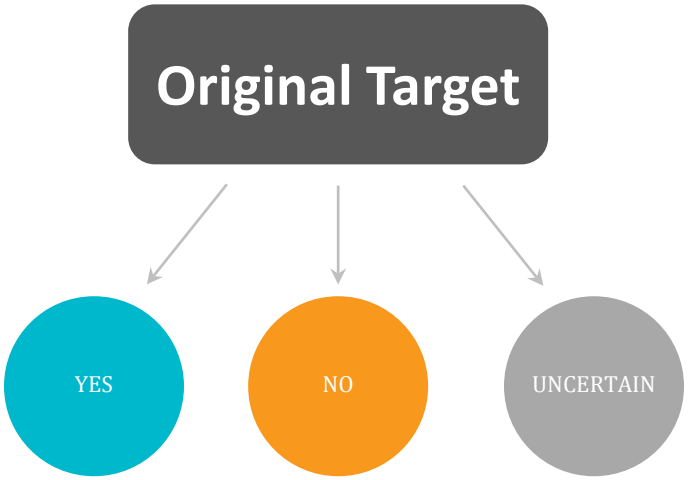
1. Metadata
   - File names, file types, folder names, created and accessed dates, accessed by, author, etc.
2. Content
3. Context in which it exists
   - SharePoint site name, database, business unit, etc.

Just Enough Information

- Visibility has costs
  - Time
  - Money
  - Other resources
- TMI: Too Much Information can be harmful
  - Will always be errors
- The goal is to gain just enough visibility to make a remediation decision
  - Legally able to rely on business records categorization

Remediation in Action

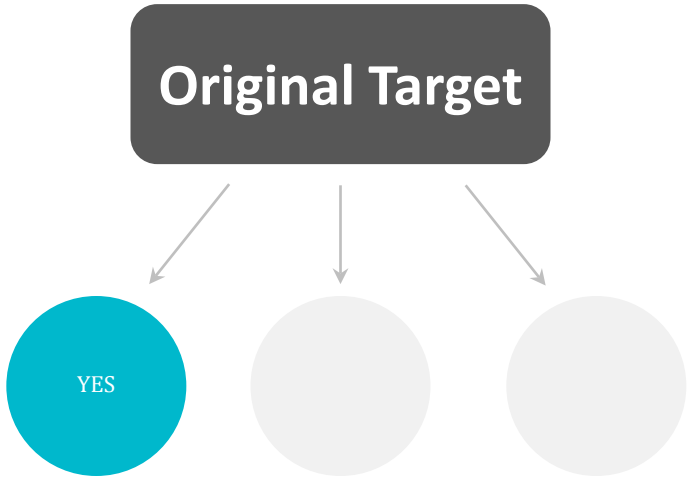
- 3 Bucket Approach



Remediation in Action

YES Bucket

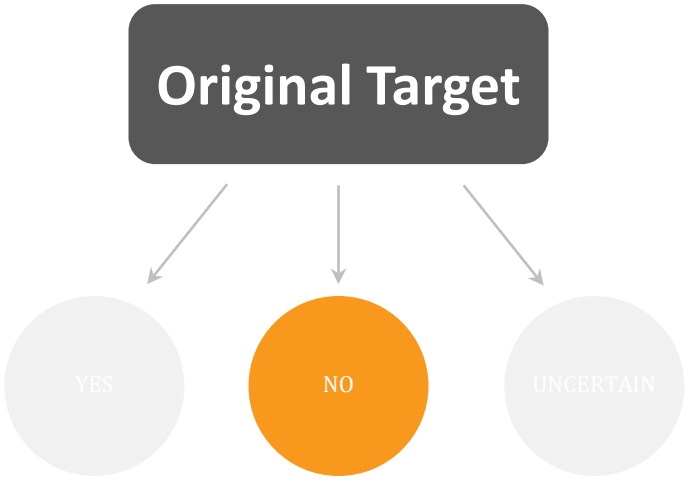
Information about which there is sufficient information to be confident that the answer to the remediation question should be “yes”



Remediation in Action

NO Bucket

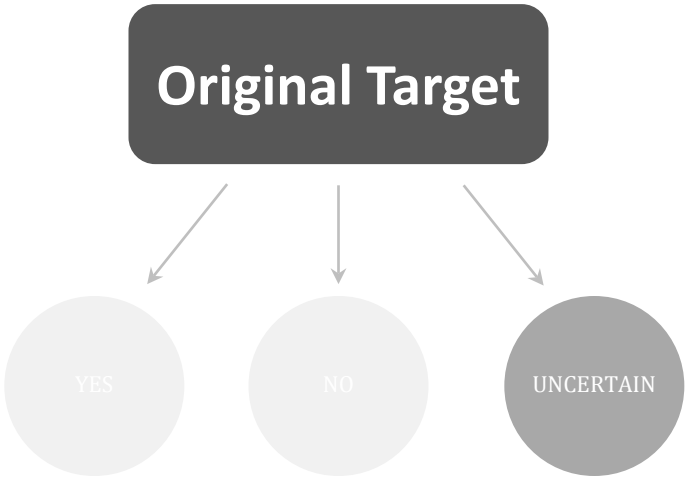
Information about which there is **sufficient information** to be confident that the answer to the remediation question should be “no”



Remediation in Action

UNCERTAIN Bucket

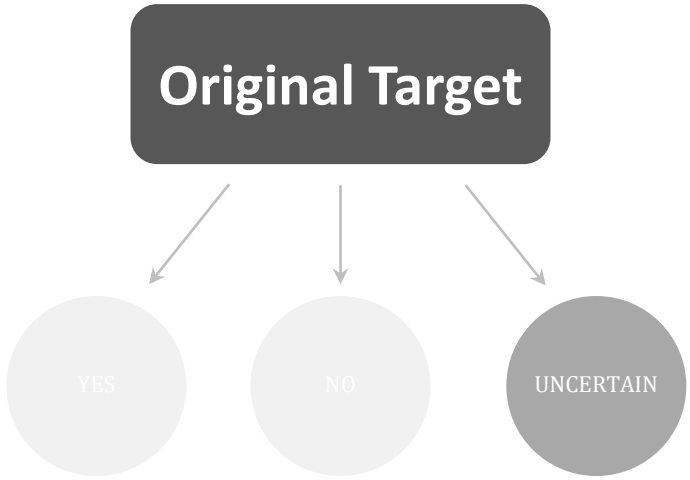
Information about which there is insufficient information to answer the remediation question



Remediation in Action

UNCERTAIN Bucket

Goal is to gain sufficient information during the remediation process to move data from the Uncertain to Yes or No



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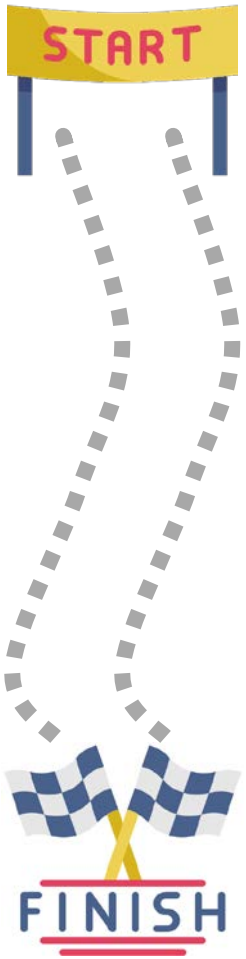
Where do you start?

I. Low hanging fruit

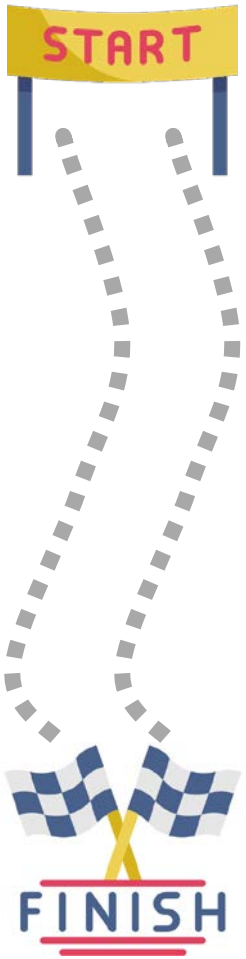
- Bite size chunk of data
- Low risk
- In your control



Where do you start?

II. Decide success metrics in advance

- Efficiency gains
- Risk mitigation
- Cost savings



Anticipate Challenges and Opportunities

- Build success one step at a time

Anticipate Challenges and Opportunities

- Go slow

Anticipate Challenges and Opportunities

- Add facets one or a few at a time
  - Start with your closest facets
  - Anticipate recalcitrant facets and develop strategy to convert them
  - Understand you are effecting a revolution, think like a revolutionary
    - Robert Shaw: Handbook of Revolutions

Biggest Challenge: The Execution Phase

- Stages:
  I. Getting Buy In
  II. Planning Stage
  III. Execution Phase

Biggest Challenge: The Execution Phase

- Every Project stalls at the first execution
  - Anticipate this
  - Go back to original purposes and commitments
  - Know who to escalate this to

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Questions and Discussion

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