Stories in Information Governance

THE IGI 2015 BENCHMARKING REPORT
About the IGI

The Information Governance Initiative (IGI) is a cross-disciplinary consortium and think tank dedicated to advancing the adoption of information governance practices and technologies through research, publishing, advocacy, and peer-to-peer networking. The IGI was founded by recognized leaders in the field of information governance and is supported by leading providers of information governance products and services.

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“The challenge and the opportunity in Information Governance is bringing together stakeholders (Practice Areas, Business Units, Executive and Administrative Teams) to leverage by fully understanding strategic objectives and various perspectives related to using, managing and protecting information/data assets. Creating a collaborative IG environment generates a knowledge base with application that increases efficiencies, ROI and mitigates organizational risk. As technology magnifies the ability to generate ever more data, Information Governance has presented itself as a critical component to overall organizational health.”

-SAMANTHA LOFTON, CHIEF RISK AND INFORMATION GOVERNANCE OFFICER AT ICE MILLER LLP
“One of the most frustrating things about Information Governance is watching a business ‘suffer’ unnecessarily. Many of the issues that plague them are the result of not having a strong, supported Information Governance Program. Translating the symptoms into a single ‘disease’ and helping them understand that the ‘cure’ is IG is what is needed. The IGI Benchmarking Report provides a comprehensive look at real world examples that help organizations recognize these symptoms and focus efforts on addressing the problem through Information Governance, thereby focusing resources on a real cure, not band-aids.

The IGI Benchmarking Report is very complete, providing real-world examples that deal with everything from the legal to the cultural aspects of implementing an Information Governance program. The industry maturity ratings included in the report confirmed my suspicions that IG programs are advancing faster in the more regulated industries, and this helps me paint a picture for my organization to understand where we are with IG and how far we have to go.”

- HOLLY STARLING, DIRECTOR, INFORMATION GOVERNANCE AT AUTOTRADER.COM
Stories in Information Governance

THE IGI 2015 BENCHMARKING REPORT
INTRODUCTION

Our mission at the IGI is to advance the practice of information governance (IG) because we believe that IG is the best chance that organizations have to truly get their information under control and to maximize its value. The best way to advance that mission is to show that effective IG is achievable and that obstacles to its adoption can be overcome.

What better way to demonstrate that than by looking at the experiences of actual IG practitioners? In fact, in our conversations with people in the IG community, we have been told repeatedly that hearing what other practitioners are doing is especially valuable to advancing the discipline. The community is eager to learn from fellow practitioners’ answers to questions like: How did you get started with IG? How did you “sell” the program internally? What obstacles did you encounter and how did you overcome them? What are you working on, now—specifically, how are you achieving successful IG?

Our 2015 Benchmarking Report will show how some practitioners have answered these (and other) important questions and will provide useful “tips” to practitioners based on those responses.

Background, Methodology, and Format

As part of annual research, we conducted 28 one-on-one benchmarking interviews with people actively working on projects they identify as part of IG. Interviewees were drawn from the IGI Corporate Council (or similar practitioners). The IGI Corporate Council is a select group of senior practitioners representing the disciplines that together comprise IG. From those interviews, we selected the most useful and have included more detailed analysis of 22 of them.

In order to ensure that practitioners were frank with us, we agreed to not identify them personally in the final benchmarking report or elsewhere without their permission. As such, we have changed their names and simplified the description of their organizations and titles in order to protect that anonymity. We appreciate the candor of our benchmarking interviewees, and we hope you will, too.

Members of our Corporate Council who would like to talk directly to any of these IG professionals are welcome to contact the IGI, and we will put you in touch.

Each practitioner was asked 10 benchmarking questions:
1. Describe your role in information governance.
2. What are you working on right now?
3. What is the single biggest barrier to achieving the ultimate goals of your IG activities, projects, or programs?
4. How did you get started with information governance? What was/is the first IG project you did/are doing?
5. How would you rate the current maturity of your IG program?
6. Why do you rate your IG program maturity at this level, and what would it take to get to the next level of maturity?
7. How did you sell your IG program internally?
8. How much are you going to spend as an organization on IG products, staffing, and services this year? Next year? By 2020?
9. Do you think your organization will be in a better or worse position this time next year as it relates to the management of information? Why?
10. What is the most valuable thing that the IGI could do for you this year?

During these interviews, unifying themes, interesting approaches to IG, effective solutions, and so on often emerged. Rather than presenting responses as disjointed answers, question-by-question, and in order to maximize the usefulness of the Benchmarking Report to IG practitioners, we have distilled and organized the responses from a subset of these interviews into short IG vignettes. Each of these includes a snapshot of the practitioner’s organization and IG program, an overview of the practitioner’s role in the organization, key takeaways from the interview, and practitioner tips based on what was discussed.

But before we delve into the individual interviews, in our “Highlights” section below, we discuss a number of the interesting ideas that appeared across a number of the benchmarking interviews.

About the Maturity Ratings

To create a more accurate comparison of IG program maturity levels at different-sized organizations across all verticals, we asked the interviewees to grade their programs based on the Carnegie Mellon Capability Maturity Model®. They were asked to assign a maturity level for the organization’s overall IG maturity. We also graded them ourselves based on the information the interviewees provided and have included our rankings for comparison. In the discussion of why they ranked their organizations where they did, many practitioners noted elements of their programs that were more or less advanced than others.
Having High-Level Support for IG Is Critical to Its Success

It should come as no surprise that having high-level support for IG at your organization increases the probability of IG project and program success or that the lack of such support impedes progress. Generally, programs with executive-level support are doing better than those without. However, because this factor came up often throughout the benchmarking interviews and in responses to different questions, we think it warrants further note here.

In the benchmarking stories below you will see the role of executive-level sponsorship, and in some instances C-suite support, is raised several times. The lack of leadership support for IG efforts was also the second most commonly mentioned response when practitioners were asked to identify “barriers to success.” (The most common answer was lack of sufficient resources, including people, time, and money.)

Executive support came up yet again in response to the question of how practitioners “sold” IG within their organizations. Just to name a few instances: In one case, a practitioner herself was the executive sponsor. In others, practitioners described a high-level executive (sometimes in the C-suite) as either being behind or at least supporting successful IG efforts. Finally, another practitioner mentioned making the case to someone in the C-suite, the CIO (who was receptive). All of these instances demonstrate the importance of getting high-level support to ensure IG efforts succeed.

At the IGI we advocate the creation of a Chief Information Governance Officer (CIGO) role. The ideal CIGO should be a person with a sufficient breadth of organizational knowledge and authority to join all of the parts of IG at an organization into an operational whole. While your organization is unlikely to have a CIGO just yet (although we are now seeing practitioners with this title or effectively in this role), it is critical for IG program success that you gain executive-level support. Aim for it in your efforts.

Titles and Positions Within an Organization’s Structure Matter

Two other interesting threads that ran through a few of the benchmarking interviews were the importance that the title of the IG role and its location within an organization appear to play.

As you will read below in the interview summaries,
something seemingly so minor as adding “information” to a title can have an impact on perception of the role. In this vein, we are seeing the word “governance” appearing in titles with more frequency. While “a rose by any other name would smell as sweet,” IG practitioners with titles befitting their roles with respect to information may have an edge at getting the work of IG done in some organizations. Consider whether a title change will have an impact at your organization. Of course, it will not solve your IG problems altogether, but it could make a big difference in the organizational perception of your activities, and thus increase the chance of progress and success.

An IG role or program can develop from within any of the various facets of information governance, but we have commonly seen them emerge from certain areas, including records and information management (RIM), legal (e.g., e-Discovery and compliance), and IT. You will see these and other facets represented in the benchmarking interviews discussed below.

Interestingly, however, there appear to be pluses and minuses related to where an IG role sits within an organization. In the stories below, you will see how an intentional shift in reporting structure and a fortuitous restructuring led to increased support for IG. If your program is not getting the support it needs, consider whether an organizational shift might help. What title an IG role should bear and where it should sit within the various facets will need to be adapted to fit the unique demands of your organization. There is no single answer to these questions.

Selling IG: The Role of Risk in Selling IG, Natural Drivers, and “Triggering” Events

While some practitioners reported that future risk was a hard sell in terms of garnering support, others report the risk side of information as being a natural driver for the adoption of IG.

Throughout our interviews and as you will see in the stories below, the risk side of information has been a very effective driver for IG efforts at some organizations. Practitioners in heavily regulated industries (e.g., health care, pharmaceutical, and banking), have legal and regulatory compliance obligations that serve as natural drivers for IG adoption. Some organizations, however, appear to need an actual incident (e.g., litigation or an investigation) or “trigger” event to get attention focused on IG. Indeed, a few practitioners noted the absence of such factors (legal/regulatory requirements or an “incident”) in their discussion of barriers to IG adoption. These practitioners were certainly not lamenting the absence of an incident, but rather noting the absence of something to get IG the attention needed to move it forward.

Salience of the risk side may be what is critical in driving IG support. But it is not ideal to wait for an incident to occur before acting. Damage control and working from a defensive and reactive posture is far less optimal than proactively taking control of your organization’s information. Mock scenarios (e.g., audits, investigations, and litigation) may be a way to test your program and increase awareness of the risk. One organization, below, tried a mock audit to limited success. Showing stakeholders the costs of not being prepared (e.g., e-Discovery costs), particularly of companies in the same vertical, may also help increase the saliency of risk.

The State of IG Is Improving

The good news is that our practitioners are optimistic about the future. Overwhelmingly, practitioners thought their organization’s IG programs were improving, with 26 of the 28 interviewees saying their organizations would be in a better position one year out with respect to the management of information. Not surprisingly, that expected improvement was generally connected to planned initiatives or projects already underway. The two who predicted a worse position were concerned with staff reductions and an influx of more information with which they could not keep up, respectively.

“...The great thing, and maybe the terrible thing as well, is that I saw myself in every single one of the profiles!”

- VICKI LEE CLEWES, VICE PRESIDENT, GLOBAL RECORDS & INFORMATION MANAGEMENT, MCKESSON CORPORATION
INFORMATION GOVERNANCE BENCHMARKING STORIES
Breaking Down Silos

**BENCHMARK SNAPSHOT**

- **Vertical:** Government
- **Size:** Unreported
- **Program Maturity Rating:** 1 – Initial (Self Ranking) / 1 – Initial (Our Ranking)
- **2014 IG Budget:** Unreported
- **2015 IG Budget:** Unreported

**BENCHMARK OVERVIEW**

Andrew is a records management leader at a state department of health. When enterprise content management (ECM) was assigned to his group, they made it clear that in order to do things properly, a commitment to IG was necessary. Currently, Andrew’s department is working on setting up SharePoint®, including drafting IG policies and procedures. They are also raising awareness of IG and its value whenever they can.

**PLANTING THE IG SEED**

Consultants can help get IG started at your organization or help to implement a specific project. Andrew’s boss is a supporter of IG; he brought in a consultant who did “a mile wide, inch-deep” analysis of their situation. The consultant then gave a presentation outlining a road map indicating how the health department might implement an IG program. Though IG lost momentum for a period of time due to a shutdown, that event sufficiently planted the seed, convincing the organization IG was important enough to move forward.

**ENDING SILOS AND ONE-OFFS**

Various functional areas charged with handling information or facets of IG can become isolated or “siloed.” This can lead to one-off projects that fail to consider the bigger picture of the role information plays inside an organization. IG promises to end this disconnected approach, consolidating the management and control of information.

When Andrew’s team was building support for their IG efforts, they shared their plans with IT first. Their presentation explained that information was not just IT’s problem and that a coordinated approach to IG was better. IT really appreciated that perspective instead of being the ones solely responsible for finding solutions. This more integrated approach helps ensure that all stakeholder interests are taken into account and the job is done right.

“We showed them a slideshow that said information was not just IT’s problem. That resonated with them—the fact that someone said it was not just their problem resonated with them.”

—ANDREW, RECORDS MANAGEMENT LEADER AT A STATE DEPARTMENT OF HEALTH

**PRACTITIONER TIPS**

SHATTER SILOS

In the world of IG, silos and one-off projects simply will not work. Break down the walls between various departments that handle information. Demonstrate how a more coordinated effort to handle information adds value.

**CONSIDER AN OUTSIDE EXPERT TO GET STARTED**

IG efforts need to start somewhere. An outside consultant can spark IG adoption by assessing the situation at your organization and mapping out a preliminary plan.
Unifying IG at a Large, Slow-Moving Company

**BENCHMARK SNAPSHOT**

**Vertical:** Insurance  
**Size:** Over 10,000 employees  
**Program Maturity Rating:** 2 – Repeatable (Self Ranking) / 3 – Defined (Our Ranking)  
**2014 IG Budget:** Unreported  
**2015 IG Budget:** Unreported

**BENCHMARK OVERVIEW**

Evan is a records manager at a Fortune 50 insurance company. His position falls within the legal group, and he handles records management for in-house counsel and compliance, a group of several hundred people.

Evan’s responsibilities have grown over the years from shipping records offsite to now managing the totality of information that moves through his group. He is currently involved in a large information management project aimed at pulling together the different pieces of how information is being handled so that they can be uniformly managed.

Right now, he reports, it is difficult to have a clear view into other parts of the company, and he considers it a bit like "herding cats." The goal is to bring all of this under control within a reasonable amount of time and money.

**USING A CONSULTANT TO GET IG STARTED**

Bringing in a consultant is sometimes an effective way to get an IG program or specific project moving. Consultants bring an outside perspective and can sometimes provide a clearer view of the problem (and hence the solution).

Evan is using this approach. The general counsel wanted to do better at IG and wanted to make sure that the company was not unnecessarily keeping outdated and useless information. To achieve their goals, they hired a consultant to help build consensus and to pull things together.

Taking the consultant’s advice, they are now working on a large project that includes a defensible disposition analysis and the development of an overall strategic plan on how IG should be organized and led. They started in legal but are now looping in other departments. There are initiatives underway in various parts of the company, and they are trying to pull these together with a consultant under one effort. The chief of staff to the general counsel is leading the charge.

**THE NEED FOR C-SUITE SUPPORT**

Evan identifies the absence of a "CIO-type" leader as the single biggest barrier he faces. The responsibilities of a senior IG leader are now spread out across the company. He needs someone at a higher level with sufficient authority and budget to get the work done.

Many practitioners point to the lack of executive sponsorship as a barrier to achieving their IG goals. Some, like Evan, are beginning to see the importance of elevating the role to the C-suite. Many IG programs suffer from the absence of a single person with the authority and breadth of organizational knowledge to join all of the parts of IG at a company into an operational whole.

At the IGI, we support the creation of an IG-specific position, the Chief IG Officer (CIGO). The CIO could serve this function, perhaps, but at many organizations, they are only responsible for technology infrastructure and not the information itself.

"It’s hard to have a view of what all different parts of the company have. The sales side has better control, but the rest of the company is like ‘herding cats’—everyone is doing something differently.”

—Evan, a records manager at a Fortune 50 insurance company

**PRACTITIONER TIPS**

**USE OUTSIDE IG EXPERTISE**

Using a consultant can help bring new perspectives on old problems and can jump start an IG project or program. If your IG efforts are stuck, consider bringing in outside help to get you started. Consultants are sometimes a way to effectively supplement your internal knowledge base.

**CREATE A SENIOR IG ROLE**

The lack of a person with the knowledge and authority to tie an organization's IG program into an operational whole can lead to its failure. Elevate IG authority to the C-suite with the creation of an IG-specific role, like the CIGO.
Think About the People First

BENCHMARK SNAPSHOT

Vertical: Insurance
Size: 1,001–5,000
Program Maturity Rating: 2 – Repeatable (Self Ranking) / 3 – Defined (Our Ranking)
2014 IG Budget: Several million dollars
2015 IG Budget: Unreported

BENCHMARK OVERVIEW

Ingrid is an information management advisor at a major insurance company. She is collaborating with management to develop an IG strategy, which includes working with IT on technology solutions. Currently, Ingrid is working on two major projects. Her company is using the rollout of an ECM system as an opportunity to revisit and update its records retention schedule. It is also building an IG framework and standards—the “gold standard” against which people will be evaluated. Now, the company is trying to figure out where each employee is in the process.

For the past five years, Ingrid’s company has had an ongoing email management program. Both the Chief Compliance Officer and CEO bought into it due to concerns about the risks associated with discovery. Ironically, for an insurance company, they have not been able to sell IG more generally because management does not believe there are many risks associated with poorly managed information. They are also worried about potential impacts on end users.

FINDING THE RIGHT BALANCE

Some policies and procedures are so detailed that they are difficult to comprehend and implement. Others are not granular enough, and valuable information gets lost.

Ingrid encountered the latter situation as she revamped her company’s records retention schedule. Though the company had a schedule for years, the categories were too broad to make sense of what they collected. Now, they are working on validating what they have and developing a more granular schedule moving forward.

The optimal level of granularity for policies and procedures depends on the situation. Striking the wrong balance in either direction can lead to problems.

FOCUS ON END USERS

The lower the burden on the end user, the easier it will be to sell your IG efforts and get compliance. Ingrid detects a perception within her company that IG initiatives will have a negative impact on end users, adding significantly to their workloads. This fear has led to pushback from management and resistance to accepting IG more generally. You can reduce user impact by automating as many processes as possible.

“When you try to implement, you get a lot of pushback from management. They think that end users are not going to like the extra work.”

—INGRID, INFORMATION MANAGEMENT ADVISOR AT A MAJOR INSURANCE COMPANY

PRACTITIONER TIPS

AUTOMATE PROCESSES

The fewer burdens on end users, the more likely that your IG efforts will be supported and compliance achieved. Automate as many processes as possible to reduce workloads.

STRIKE THE RIGHT BALANCE

It is important to find the optimal level of granularity on IG policies and procedures. Simplify rules where possible but not to the extent that you lose valuable information. IG is about handling information better—something you will not achieve when important details are lost. Consider the impact of lost details when refining existing rules and drafting new ones.
Rebuilding the Airplane in Flight

BENCHMARK SNAPSHOT

Vertical: Banking
Size: 1,001–5,000
Program Maturity Rating: 1 – Initial (Self Ranking) / 2 – Repeatable (Our Ranking)
2014 IG Budget: $2 million
2015 IG Budget: $2 million

BENCHMARK OVERVIEW

Dianne is an IG manager in the banking industry. She oversees data and knowledge management, and information architecture. Her company is very young and growing quickly. It did not have enough time to build a solid IG foundation prior to that growth, but that is what she is working on now—while they are moving fast. Dianne’s current projects include an ECM system, developing an information retention and disposal schedule, and building a data classification system.

CHANGING END-USER BEHAVIOR

For IG initiatives to succeed, human behavior needs to change—which can be a major obstacle. In the wake of a costly data storage problem, Dianne is drafting a service-level agreement for internal company end users intended to alter behavior. She is developing a system in which the end user pays for storage. The program will help raise awareness about storage costs, and she hopes it will change user storage behavior.

MOVE BEYOND FIGHTING FIRES

While crises (e.g., litigation and government investigations) can certainly drive IG initiatives, a reactive posture will not always take your program in the direction you want. Dianne sometimes finds herself in this position. It is usually hard to get a decision maker’s attention, but they listen when crises occur.

While the work she is doing in response to some incidents is certainly IG-related, Dianne would prefer to move in a different direction to advance the company’s overall IG goals. Instead of remaining in a reactive posture (i.e., “fighting fires”), Dianne is working to build “informational awareness” and “intelligence” at her company. She is also developing a company-specific language within the organization. She hopes her IG efforts will help her company avoid crises altogether.

“When you are constantly fighting fires, it is harder to keep your eye on the long game. So, while you may be addressing an IG matter, it is not always the thing that would most advance your IG goals.”

-DIANNE, IG MANAGER IN THE BANKING INDUSTRY

PRACTITIONER TIPS

EMBRACE INNOVATIVE APPROACHES

Changing behavior is a major challenge when it comes to implementing an IG project or program. Develop innovative approaches to increase end-user awareness of the costs of their behavior. Alternatively, develop rewards systems to encourage compliance.

BE PROACTIVE

Responding to crises and having a reactive posture may advance IG in some respects, but it may also take your program in a direction you did not plan. In business, crises are often predictable, and it is essential they are avoided if possible. Look to your industry and learn from others’ experience. Use that knowledge to shift to a proactive posture.

EDUCATE ALL STAKEHOLDERS

All employees need to be on the same page. Drafting company-specific language and encouraging the awareness of “information intelligence” will help ensure compliance.
Keep Pushing and Carry a Big Stick

**BENCHMARK SNAPSHOT**

**Vertical:** Banking  
**Size:** Over 10,000 employees  
**Program Maturity Rating:** 4 – Managed (Self Ranking) / 4 – Managed (Our Ranking)  
**2014 IG Budget:** $2.4 million  
**2015 IG Budget:** $4 million

**BENCHMARK OVERVIEW**

Rebecca is the VP of information management at a Fortune 500 bank. She manages the RIM part of the organization but works closely with other IG stakeholders in the business (e.g., legal, IT, and audit). She used to have to push hard to get support for IG. Now, she leads the company’s IG board (which she helped form).

There are some big IG efforts underway, and IG is being integrated across the company. For example, her organization is moving all of its information from multiple hosted repositories to a single, offsite, hosted IG platform. Rebecca is also working on an email archiving project.

**CONTINUING THE CONVERSATION**

Colleagues are often busy with competing priorities of their own, so getting them to sit on yet another committee may be a hard sell.

When Rebecca joined the company, her first initiative was to build an IG board that brought together stakeholders from across the organization. She did not get support at first, but she says she just kept at it—and you should do the same. Rebecca found that many of the colleagues she approached were too busy to work with her on IG efforts. Since time is finite, this is not an uncommon problem. Still, Rebecca attributed their busyness to the company’s hectic schedule.

Busy people need to be convinced of the value of IG to get involved with the process. Rebecca built relationships with all pertinent stakeholders, showing them why their actions are important and how IG adds value. Over time, she gained support. Today, Rebecca heads the board she built.

**BE THE DRIVER**

Because Rebecca’s company is in a highly regulated industry, it is easier for her to sell her program internally. She has a “big stick” in her back pocket to help get things done. Even so, she says that while regulation is a perfectly good, natural driver for some IG efforts, it takes her in the opposite direction of where she needs to go for others. Regulators, she points out, are not exactly driving people to get rid of information.

E-Discovery costs and the threat of litigation are drivers that encourage Rebecca’s company to embrace IG. These forces can be valuable in moving IG forward, but be aware of the direction each one is pushing. If they are not aligned with your optimal IG plan, take control and redirect.

**PLUGGING IN**

IG needs to be top of mind for all organizations—not something that is brought up after issues arise. When IG becomes an afterthought, it can be difficult to fund and complete projects. You will save time and resources by incorporating IG into projects from the start.

Rebecca’s company considers IG in all its functions. She describes her IG efforts as “plugged in” to a lot of different places in the company where data is managed. She is also plugged in at the project level. Her team is involved with a new project or application from its inception. While there are still some unmanaged repositories that remain, they are aiming for complete, systemic control.

**PRACTITIONER TIPS**

**SHOWCASE IG’S VALUE**

Colleagues have competing priorities. Some may be too busy to join yet another committee, but coworkers can be convinced to take on new projects if they see the value in them. They are only too busy to take on projects that promise little or no return. Show stakeholders the value IG adds. If you do run into people who truly have too much on their plates at a given point, consider someone else from that person’s team. Do not let one person’s busy schedule thwart progress.

**BUILD WITH IG**

It is much harder to implement IG once a project commences. Consider IG at the beginning of every project to avoid hurdles down the road.
“It took a while to build the relationships and to pull everyone together. It is a busy company and a busy time. People need to find value in what we are doing.”

—REBECCA, VP OF INFORMATION MANAGEMENT AT A FORTUNE 500 BANK

DO NOT LET DRIVERS BLINDLY STEER YOU
Litigation, IT projects, and other IG drivers can help push IG efforts forward. But they can also compete with one another and take you in a direction you do not want to go. Use these drivers to further initiatives that you have thought through carefully. Use them to further your company’s objectives rather than letting them dictate where you end up.
Moving Beyond Compliance

**Benchmark Snapshot**
- **Vertical:** Financial Services
- **Size:** Over 10,000 employees
- **Program Maturity Rating:** 2 – Repeatable (Self Ranking) / 3 – Defined (Our Ranking)
- **2014 IG Budget:** $5 million to $10 million
- **2015 IG Budget:** Decreasing

**Benchmark Overview**
Colleen is a records and information management leader at a large financial services firm. She sets policies and procedures and oversees implementation and compliance. She is mainly focused on records, but her work also involves data retention, archiving, retrieval, and destruction. Though she works in a heavily regulated industry that would appear risk-oriented, her company also focuses on extracting business value from its data.

**Leveraging New Technology**
IG is not just about minimizing the risk and costs associated with storing and retrieving information. It is also about extracting business value. Colleen’s company understands that information systems can often overlap, creating an opportunity for a more effective approach to IG.

The company had been struggling with its existing technology. It was not meeting their needs, and it soon became apparent that they needed to upgrade their infrastructure. Her team decided to implement an enterprise-wide solution to manage, archive, and retrieve information used by the HR, legal, and compliance departments. As part of their efforts, Colleen’s company created a centralized e-Discovery area.

Interestingly, the company assembled a core group of people to become experts on the underlying systems in order to quickly produce results for other departments, too. The goal is not only to create a repeatable process for legal requests, but also to leverage that information for business purposes.

**Look Short and Long**
An effective IG program addresses both short- and long-term issues. Because she had a senior sponsor and is in a regulated industry, IG efforts at Colleen’s company were easier than they might have been at other organizations just getting started with IG. Her team never needed to present IG as an initiative in isolation. Colleen says she was able to sell the program by showing people what their industry was required to do and why it was smart to do it.

Even so, with the enterprise-wide system in place, Colleen considers her company’s IG program a “work in progress.” They get consistent results, but she thinks they need to broaden the reach of IG. She advocates a two-prong approach: one that addresses immediate issues while also considering long-term strategic goals. Comprehensive IG programs include both.

“The legal compliance perspective, our real objective is to have a consistent, repeatable process for legal requests. But we also want to leverage that information for business purposes.”

—Colleen, Records and Information Management Leader at a Large Financial Services Firm

**Practitioner Tips**

**Technology is Versatile**
Technology adopted to address one problem can be leveraged for other purposes. This versatility can be helpful in selling your IG efforts. The true promise of IG is not just about minimizing costs and risks. It is also about maximizing the value of information.

**Identify Short- and Long-Range Goals**
An effective IG program addresses both short- and long-term IG issues. Make sure your IG program does not become so focused on immediate projects that you neglect long-term goals. At the same time, you should not get lost in long-range goals and fail to demonstrate immediate value. A strong IG program balances both approaches.
Moving IG Forward with Available Resources

**BENCHMARK SNAPSHOT**

**Vertical:** Financial

**Size:** 5,001–10,000

**Program Maturity Rating:** 2 – Repeatable (Self Ranking) / 2 – Repeatable (Our Ranking)

**2014 IG Budget:** Unreported

**2015 IG Budget:** Unreported

**BENCHMARK OVERVIEW**

Amy is an IG leader at a financial institution. She serves as the records manager for her company, manages vendor relationships, reconciles regulations with retention schedules, and works with the legal team on e-Discovery matters. Amy’s first major project involved putting protections in place for certain non-public information (NPI) which included locating the NPI, migrating it to new servers, and implementing access controls.

Though she works in a heavily regulated industry, she does not have high-level executive support for an IG program. She says there have not been any major events that might spur support (e.g., litigation) and that there is a general lack of visibility for IG at her company.

Amy started as a records information specialist but now has IG in her title. Like others during the benchmarking interviews, she thinks the title is important and also better describes her role. She wonders about the best location for her IG role within the company; being in enterprise risk instead of IT might be better.

The promise of IG is to improve the way in which we handle our information. A key part of that is its ability to serve as a liaison between the various stakeholders and information functions. As demonstrated by Amy’s company, multiple IG facets need to work together to effectively address problems.

**USE WHAT YOU HAVE**

You will not necessarily always have the ideal tools and resources in place to tackle a particular IG problem. Sometimes, you need to make do with what you do have—just like Amy is doing now.

She is currently working on an enterprise cleanup week to address some of the unstructured data that has been piling up. Ideally, she would be able to use technology to take care of this, but her team does not have the budget to purchase a tool that would help automate the process. Instead, deletion will be done manually.

The only way she can make this happen, she says, is through education—which she sees as a key part of her current work. Though automation would certainly make the task easier, the company can still make progress without it. By moving forward, Amy will also be able to identify the exact tools she could have used to do the job better. A trial run like this can help organizations avoid investing in the wrong technology from the outset.

**PRACTITIONER TIPS**

**THE POWER OF COORDINATION**

Most IG issues cannot be resolved without coordinating various information-related activities. Information is not any one functional area’s asset or problem. It is everyone’s. Start thinking about your organization’s information as belonging to the organization—not to any single department. IG solutions—those that maximize the value and minimize the risks and cost of information—can only be fully realized by coordinating how information is handled across functional areas.

**DO NOT WAIT FOR RESOURCES**

You may not always have the right resources and best tools to tackle a particular IG issue. Work with what you have to move IG forward. You can still make measurable improvements by implementing thorough processes with a strong team. Fewer resources at the moment may also serve as a blessing in disguise. You will be able to make a better case for the additional resources and right tools when the time comes.
An IG Program with Broad-Range Support

BENCHMARK SNAPSHOT

Vertical: Retail
Size: Over 10,000 employees
Program Maturity Rating: 3 – Defined (Self Ranking) / 3 – Defined (Our Ranking)
2014 IG Budget: Unreported
2015 IG Budget: $6 million

BENCHMARK OVERVIEW

Peter is a senior analyst at a Fortune 50 drugstore chain. He leads the IG efforts at the company, serving as a liaison between various business units. Currently, Peter is working on updating the enterprise retention policy, developing an email policy, and establishing an ECM system. His main focus is educating and empowering people to manage information in a compliant way.

Unlike the issues many practitioners face, Peter reports having broad-range support for IG initiatives at his company. This may be related to company culture and the maturity of its IG program. Still, the company’s approach to new IG initiatives illustrates some best practices for both garnering support and getting IG projects done well.

A COLLABORATIVE APPROACH

When a new IG effort is proposed, Peter kicks off the project with extensive research. A committee then vets his findings, identifying all stakeholders in any given project.

By investing time and effort in research and due diligence up front, Peter’s team is able to present appropriate and reliable information and solutions to relevant stakeholders. This upfront work allows presentations to be clear and concise. Peter’s team does not waste anyone’s time, helping build relationships of trust. Projects are then further developed based on stakeholder input.

“We really have broad-range support for our initiatives. I don’t really see anything marshaling against them.”

–PETER, SENIOR ANALYST AT A FORTUNE 50 DRUGSTORE CHAIN

PRACTITIONER TIPS

FOCUS ON GARNERING SUPPORT

It is possible to develop a very effective, thorough approach to IG projects if you have enough support at your organization. When initiating an IG project, in addition to getting key stakeholders involved, build trust by demonstrating that you are a source of reliable and relevant information. Adopt a solutions-oriented, collaborative approach to encourage stakeholder buy-in.

DO YOUR DUE DILIGENCE

The easiest way to discourage stakeholders is by wasting their time. By doing your due diligence before presenting new IG initiatives, you will be able to relay information in a clear and concise way—something that will not go unnoticed.
Stuck: No Formal IG Program

**BENCHMARK SNAPSHOT**
- **Vertical:** Manufacturing
- **Size:** Over 10,000 employees
- **Program Maturity Rating:** 2 – Repeatable (Self Ranking) / 2 – Repeatable (Our Ranking)
- **2014 IG Budget:** Unreported
- **2015 IG Budget:** Unreported

**BENCHMARK OVERVIEW**
Bob is the compliance manager at a major manufacturer. He does not see his position as a distinct IG role, but rather a part of “standard business.” His responsibilities include issuing legal holds, bridging the gap between legal and IT on discovery issues, and policy administration for records retention and management.

Like many practitioners, Bob’s first big project at the company was updating the retention policy and schedule. He is currently working with IT on an Office 365 migration and is addressing policies related to employee use of online services like Dropbox. His company does not have a formal IG program. While Bob thinks IG is a good vehicle for coordinating information-related activities, he is having a hard time getting it formally started at his company.

**LACK OF EXECUTIVE SPONSORSHIP**
Lack of executive sponsorship serves as a major barrier to getting IG started at Bob’s organization. He is not alone; this is a common problem advocates face when trying to start IG projects or programs.

Without the support of someone in leadership who has the ability to allocate resources and draw appropriate attention to IG as a way to handle information better, the effort will likely fail. For this and other reasons, the IGI supports the creation of a C-suite-level role for IG, the Chief IG Officer (CIGO). Some level of executive sponsorship is necessary to build an effective program.

Still, Bob may be on the right track for getting the executive support he needs. He has already started to think about the problem in a way that will help him make his case, as demonstrated in the next section.

**MAKING THE BUSINESS CASE FOR IG**
Bob does not see his role as “selling IG.” He focuses on doing what he can to add value to the corporation. He thinks it is difficult to demonstrate that IG makes business sense, i.e., that it increases profits. Though Bob has not solved this problem yet, he is already thinking about it in a way that will lead him to a solution. He believes IG is good for the business, that it adds value. He is more likely to get support when he frames the problem that way. Next, Bob needs to identify and execute a few measurable projects to demonstrate the value of IG.

“You need an executive sponsor to drive this.”
—Bob, compliance manager at a major manufacturer

**PRACTITIONER TIPS**

**COURT EXECUTIVES**
The lack of executive sponsorship can stall an IG program. Initiate contact with potential executive sponsors for your efforts right away. If you do not find an existing supporter, show leadership that IG adds value.

**DEMONSTRATE VALUE**
Making the business case for IG is always important, but it is especially so when you do not have executive sponsorship. Identify short-term, small projects with measurable results to help build support.
“Strong IG programs, rooted in the foundational best practices of the Generally Accepted Record Keeping Principles, give businesses the peace of mind that comes with knowing its information is secure and easily retrievable. Beyond that, IG allows businesses to realize the true power of their data—and therefore a healthier bottom line. IGI’s Benchmarking Report provides IG stakeholders the insight they need when aligning their IG programs with standards and best practices in order to maximize the value of data as a strategic asset.”

—FRED A. PULZELLO, PRESIDENT OF ARMA INTERNATIONAL AND A MEMBER OF IGI’S ADVISORY BOARD.
Lone Wolf Howling to Get IG Started

**BENCHMARK SNAPSHOT**
- **Vertical:** Manufacturing
- **Size:** Over 10,000 employees
- **Program Maturity Rating:** 3 – Defined (Self Ranking) / 3 – Defined (Our Ranking)

**BENCHMARK OVERVIEW**
Theresa is a records manager at a Fortune 200 manufacturer. There is no formal IG program at her company, though elements of IG are in operation. She sees herself as the “lone wolf” trying to get IG implemented.

Over a year ago, Theresa’s company replaced its old records retention system and physical records with a new system that had IG capabilities. Her IG education began through the process of searching for the new system and implementing it. During that process, she became more “IG-aware” and now considers herself an “IG evangelist.” Up next, Theresa plans to organize an IG steering committee.

**ONE RELATIONSHIP AT A TIME**
Education, or the lack of it, is the biggest barrier impeding IG at Theresa’s organization. She sees the need to make people aware of IG and to show them why it is important.

At the moment, she does not have approval to set up an IG steering committee, so she is informally laying the groundwork herself—one person at a time. Theresa has built relationships with colleagues in various departments, including the executive who oversees HR. She also has backing from legal and her bosses. Theresa strives to build consensus and support for IG through these one-on-one interactions. Hers is an effective and often necessary approach. Theresa is creating a solid foundation that will undoubtedly pay off once a committee moves forward.

Building an IG steering committee takes time, so a lack of formal support should not bring efforts to a halt. Spending the right amount of time developing working relationships with key IG stakeholders helps build a strong foundation for an effective steering committee.

“It’s the biggest barrier is educating people in the C-suite and getting their buy-in.”

—Theresa, Records Manager at a Fortune 200 Manufacturer

**PRACTITIONER TIPS**

**BE PROACTIVE**
You will not always have immediate, formal support for setting up an IG steering committee. Don’t let that deter you. Be proactive even if you do not have the right people on board just yet. Spend time building relationships with key players in the various facets of IG. Those relationships will form a solid foundation for an effective steering committee.
Using Privacy to Drive an IG Program

BENCHMARK SNAPSHOT

Vertical: Pharmaceuticals
Size: Over 10,000 employees
Program Maturity Rating: 3 – Defined (Self Ranking) / 3 – Defined (Our Ranking)
2014 IG Budget: $1-2 million
2015 IG Budget: Unreported

BENCHMARK OVERVIEW

Paul works in a heavily regulated industry. He is the IG leader at a global pharmaceutical company. Paul’s IG function coordinates RIM, information protection, privacy, and knowledge management. Paul is currently working on implementing global data protection principles in the company’s US operations and on developing a better means of monitoring and policing user compliance with policies and procedures.

PRIVACY AS AN IG DRIVER

Paul is currently working on implementing global data protection and privacy principles in the US. The company is working on adapting EU privacy standards to its US operations. This is a challenge given the current disparity in approaches to privacy in the US and EU. Although there are external requirements, Paul’s efforts are also driven by a desire to achieve operational efficiency by having a unified approach across the globe. Reconciling the varying approaches to privacy and IG at operations across the world is expected to streamline business functions and improve the company’s ability to operate in compliance with legal and regulatory requirements as well as achieve its core values.

Paul’s mission is to ensure that content is secure, but also easily and quickly available to the organization. His biggest challenge is keeping the company aware, culturally, of what they are trying to achieve and why.

IG IMPLEMENTATION = IG TRAINING AND METRICS

In a compliance-driven industry, making sure that end users follow policies and procedures is essential, but end users cannot follow what they do not understand. For this reason, one of Paul’s main projects is to create and collect IG compliance-related metrics. Every six months, the company conducts an internal survey consisting of 20 objective multiple-choice questions. Metrics targets are set and results are tracked over time to show company-wide improvement in understanding.

People who score less than 80% on the survey receive additional training. Training is not a one-time step approach at the company. There is follow-up, testing, and additional training as needed to reinforce concepts.

Looking ahead, Paul believes the company will be in a “much, much better” place with IG next year. The company has a culture of compliance, and there is excitement about what they have been able to achieve so far.

“Our main goal is to further the business and not get sideways with them. We are building IG compliance into the business process.”

—Paul, IG leader at a global pharmaceutical company.

PRACTITIONER TIPS

OPERATIONAL EFFICIENCY THROUGH CONSISTENCY

A strong argument for an enterprise-wide, global approach to IG is not just improved compliance, but also improved operational efficiency. Disparate approaches add friction to the business process.

METRICS ARE CRITICAL

IG programs cannot be based on tradition, fear, or superstition. Like other areas of the business, data insight is essential. Create and track metrics to help you understand your goals and progress. Training metrics are a good place to start.
How They Stack Up: Self Rankings vs. IGI Rankings

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<th>Self</th>
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An Instigator Takes an Executive Role

BENCHMARK SNAPSHOT
   Vertical: Pharmaceuticals
   Size: Over 10,000 employees
   Program Maturity Rating: 2 – Repeatable (Self Ranking) / 3 – Defined (Our Ranking)
   2014 IG Budget: Unreported
   2015 IG Budget: Unreported

BENCHMARK OVERVIEW
   Mary is the VP in charge of IG at a Fortune 50 pharmaceutical company. Her position sits within records and information management (RIM). She is navigating a large organization, in a heavily regulated industry that is subject to frequent litigation, through the process of setting up an IG program. She describes the program as being in its infancy, and Mary considers herself the “instigator” for IG at her company.

BUILDING THE FOUNDATION FOR AN IG COUNCIL
   When Mary joined the company just a few years ago, there was no IG program. She came in with the idea of consolidating RIM, privacy, compliance, security, human resources, and finance into an IG group. What she found was a common problem practitioners face when beginning an IG program—some of the facets of IG were immature or missing.

   According to Mary, privacy and RIM were immature, lacking important foundational program elements, and some regional operations were missing key facets of IG altogether. She did not think she could move forward with a more comprehensive program without getting a solid foundation in place first, so she spent the first two years developing those basic functions and building her team.

   Today, Mary’s company is in the process of building an IG council (or steering committee), writing its charter, developing a decision-making structure, and setting IG priorities. Mary could not have made this progress without building a solid foundation first.

GETTING BUY-IN FOR IG
   Because Mary is the executive sponsor for IG, selling her IG program internally is not as difficult as it is for those without senior-level support. Even so, Mary still needs to make the case for IG to many internal constituencies, and her approach illustrates some effective strategies that have general applicability.

   Each quarter, Mary meets with the security team (including the GC, CFO, COO, and head of HR) about initiatives that are underway. Every time they meet, she explains what IG work was done and where they are headed. She sets a clear vision of what to expect and addresses any concerns up front. With this approach, when she is ready to begin a project, everyone is already on board. Building her case over time—what she calls the “slow-blow” sell—avoids last minute, abrupt, hard sells, and the potential for resistance and projects stalling.

   Mary also notes that she tailors her approach to the specific audience. Her direct superior is very metrics-oriented, while other constituencies prefer anecdotal evidence. Mary adjusts her approach accordingly. It is more effective to sell an IG effort to a given constituency if you speak to what they value and in terms they understand or prefer.

FUNDING: THE IG TAX
   Like most executives, Mary could always use more money to fund her IG program. Mary is at a slight advantage over some in that she has a senior position and can draw from her own budget. But her budget cannot cover everything nor does she control all of the areas related to IG at the company. They have to “dip into lots of pots.” So Mary proposed a solution to overcome the funding issue: assessing an IG “tax.” Such a tax would allocate a few percent from each budget that IG touches, which, in many organizations, is nearly every budget.

PRACTITIONER TIPS
   BRINGING MATURITY TO IG FACETS
   For an IG program to succeed, key facets of IG must exist and be mature at your organization. If facets are missing or immature, train, hire, or seek outside guidance to address the deficiency.

   UNDERSTAND WHAT EVERYONE WANTS
   Building support for a given project can take time, and various constituencies within a company may value different selling points of an initiative. Try to address the concerns of each constituency from their perspectives and give them time to prepare for changes. The hard, abrupt sell can sometimes face resistance and get stuck.
“I had to step back and say that there are a lot of things that have to happen before the IG idea could even be heard. You have to show them you understand your information first before you can govern it.”

—Mary, VP in charge of IG at a Fortune 50 pharmaceutical company
Embracing Automation for IG Progress

**BENCHMARK SNAPSHOT**

- **Vertical:** Biotechnology
- **Size:** 5,001–10,000
- **Program Maturity Rating:** 2 – Repeatable (Self Ranking) / 2 – Repeatable (Our Ranking)
- **2014 IG Budget:** $2 million
- **2015 IG Budget:** $2.5 million

**BENCHMARK OVERVIEW**

Tracy is an IG and security leader at a Fortune 500 biotech company. Her position sits within infrastructure and reports to the CIO. She is responsible for global records and information management, including all policies and processes. Her work is expanding into IG. There is C-level support for IG at the organization, and Tracy hopes it will not stay “buried” in IT for long.

**REDUCING HUMAN ERROR**

Compliance is harder to achieve with each additional procedural rule. The more manual applications necessary, the more likely end users will apply the rules inconsistently. The resulting inefficiencies can be costly.

Tracy is currently working on an automated information classification project that is part of a data loss prevention (DLP) program. The project is considered of high importance and is being driven by board commitments. A policy has already been created and approved. It includes use of a pilot technology that automates the assignment of a sensitivity classification to information before the DLP tool is applied. This automation ensures rules are followed and classifications are accurately applied. Now, Tracy’s company does not worry about human error interfering and stifling results.

**PRACTITIONER TIPS**

**AUTOMATE, AUTOMATE, AUTOMATE**

It can be difficult and costly to get end users to consistently apply IG policies and procedures. Explore technologies that can help you automate as many processes as possible.
Nothing Has Happened...Yet

BENCHMARK SNAPSHOT

Vertical: Pharmaceuticals
Size: 1,001–5,000

Program Maturity Rating: 2 – Repeatable (Self Ranking) / 2 – Repeatable (Our Ranking)

2014 IG Budget: Unreported
2015 IG Budget: Unreported

BENCHMARK OVERVIEW

Megan is an information management leader at a pharmaceutical company. Though she works in a heavily regulated industry, her company does not have an official IG team. To date, she has not been able to sell one. She sees the value of IG and imagines her role fitting into that concept.

Currently, she is focused on RIM, telling the RIM steering committee the big picture is more than just records. She wears many hats, putting policies, procedures, and tools in place to help better manage records; handling e-Discovery and legal holds; and taking care of FDA inspections—all parts of the IG bigger equation. Megan’s company is rolling out SharePoint® with records information functions, including disposition of records and legal holds. She believes the information will be even harder to manage next year due to the simple fact there will be more of it.

No Catastrophes...Yet

Since future risk and associated costs are hypothetical in nature, IG programs can be a tough sell. People have a natural aversion to thinking about the bad things that might happen in the future—even if they know better. Future risks might also compete with current priorities for resources. Megan encounters these issues regularly when trying to get support for IG initiatives.

Megan notes that nothing catastrophic has happened at her company—which is a good thing. Unfortunately, it has created an atmosphere that lacks urgency. She has a hard time convincing management to create an IG board. Instead, they are focused on the present moment.

Her company had a mock audit, but Megan says it was too complex for them at the time. Still, using mock scenarios to test the preparedness of your IG program is an intelligent approach.

Concerned about the risk side of information, Megan wants to convince her colleagues it is important to address IG before something happens.

She suggests it might be helpful to have a way to illustrate the consequences of inaction—in a “facts and figures way”—to drive home the importance of IG. Megan may be on the right track to make her case successfully. By demonstrating the impact of not acting and supporting her case with relevant industry examples, she will convince her colleagues to buy in to IG.

“There’s no sense of urgency because nothing has happened to let them see the value of putting an IG board in place.”
—Megan, an information management leader at a pharmaceutical company

PRACTITIONER TIPS

MITIGATE FUTURE RISKS

Selling a program on future risk can be difficult if the threat seems distant—or altogether unlikely. To successfully make the case for IG, consider using mock scenarios to test your program’s strengths or demonstrate its weaknesses. Calculating the costs of inaction can also help. Use comparable industry examples to estimate the expenses your organization might incur.
Capitalizing on a Triggering Event

**BENCHMARK SNAPSHOT**

- **Vertical:** Pharmaceuticals
- **Size:** Over 10,000 employees
- **Program Maturity Rating:** 4 – Managed (Self Ranking) / 4 – Managed (Our Ranking)
- **2014 IG Budget:** Unreported
- **2015 IG Budget:** Increasing

**BENCHMARK OVERVIEW**

Veronica is an e-Discovery leader at a Fortune 200 pharmaceutical company. She serves as the legal representative on a cross-functional team that includes legal, records management, and IT. The IG program at her company has been running for several years. It has executive-level sponsorship and enjoys the money and resources necessary to make it effective.

Veronica’s company has numerous initiatives underway at this time. For example, it is working on policies for media backup, auto-deletion, recycling electronic media, and removable media; decommissioning old databases; creating a taxonomy for RIM systems; and building an archive for structured data. This advanced program got its start thanks to a major precipitating event.

**A BIG BANG**

IG initiatives do not always have to be sold internally. They can start with a big bang—a major precipitating event like litigation or a government investigation—that forces a company to reexamine the way it handles information.

The program at Veronica’s company traces its roots to such an event. Though she did not discuss the event’s specific nature, she did explain some reasoning behind how it laid the groundwork for the company’s current IG program. Veronica says her company uncovered large swaths of mismanaged data everywhere they looked during e-Discovery. Costs became a major issue, getting the attention of senior management who wanted to rein in spending and also get a clear understanding of proprietary data. The problem was simply too big for any one group to handle alone, so an interdisciplinary team was created.

“No one group could fix this, so an interdisciplinary team of records managers, legal, and IT was formed.”

—VERONICA, E-DISCOVERY LEADER AT A FORTUNE 200 PHARMACEUTICAL COMPANY.
An IG Council Is Not a Panacea

BENCHMARK SNAPSHOT

**Vertical:** Pharmaceuticals  
**Size:** 5,001-10,000  
**Program Maturity Rating:** 1 – Initial (Self Ranking) / 2 – Repeatable (Our Ranking)  
**2014 IG Budget:** Several million  
**2015 IG Budget:** Unreported

BENCHMARK OVERVIEW

Samantha is the head of records and information management at a biopharmaceutical company. The company has an active IG council (i.e., a steering committee). Samantha co-chairs the council, which has numerous initiatives underway. Currently, they are working on a campaign to raise IG awareness and recently launched a RIM policy framework, standards, and training. The council is also working on improved records management and e-archiving solutions.

COMPETING PRIORITIES

An IG steering committee—even one that is active, has proper representation and meets regularly—is not a panacea. Samantha’s company has assembled a core group of people to form its IG council. Members include the head of IT security and compliance, the privacy officer, the head of RIM, legal, audit, HR, IT architecture, and representatives of some business areas. The council meets quarterly and, among other things, is responsible for incident management (e.g., data breaches).

Samantha sees having the council—with the right level of people, knowledge, and enthusiasm—as a big step. She is right, and clearly her company has numerous IG elements in place and underway. Surprisingly, Samantha still ranks her overall IG program level rather low (between a 1 and 2 on a 5-point scale). While we would rank her program higher (based on her description), her reasoning shows why even having a solid IG council in place, in and of itself, is not always enough to effectively address IG.

Samantha says she still has trouble getting IG prioritized over immediate demands. Some recent restructuring created IT infrastructure challenges that are draining resources and “tactical solutions are overwhelming strategic imperatives.” She hopes that once the infrastructure issues are addressed, they can look more strategically at managing content. She also thinks the CIO should be more engaged in the IG progress.

Even a well-staffed, active IG council can require additional pull when its efforts are competing against other priorities. As Samantha’s insights suggest, C-suite involvement may be the key. For this reason, as noted elsewhere in this report and in our 2014 Annual Report, the IGI has called for the creation of a Chief IG Officer (CIGO).

“We have the right level of people and right level of knowledge, and the people are enthusiastic.”

—Samantha, head of records and information management at a biopharmaceutical company

PRACTITIONER TIPS

AN IG COUNCIL IS JUST A START

A well-staffed IG steering committee with representations across the various facets of IG is essential to an effective, comprehensive program—but it is not enough. Consider C-suite involvement with IG. When there are competing priorities at a company, this level of involvement may be necessary to marshal resources toward much needed IG efforts.
Dealing with Entrenched Attitudes

**BENCHMARK SNAPSHOT**

**Vertical:** Chemicals  
**Size:** Over 10,000 employees  
**Program Maturity Rating:** 2 – Repeatable (Self Ranking) / 2 – Repeatable (Our Ranking)  
**2014 IG Budget:** $1.5 million  
**2015 IG Budget:** $3 million

**BENCHMARK OVERVIEW**

Dmitri is the head of information risk and privacy at a Fortune 500 chemical company. He works within the corporate risk office and covers all elements of enterprise and information risk management, including asset protection, data privacy, and enterprise records management.

His company recently reviewed and updated its policies and standards. It also conducted a risk assessment that included a risk schedule and codes to define the company’s information. Dmitri is currently working on an enterprise e-content management strategy. His company has received RFPs from several vendors.

**AN ENTRENCHED FACET OF IG**

Practitioners often discover that various functional areas of IG can become “siloed.” These facets get absorbed into their own perspectives as to how information should be handled. A facet can become risk- or value-focused, for example. It might also focus more on where it sits (e.g., infrastructure or storage) instead of the actual content it is handling.

Dmitri has encountered a version of this problem at his company. He believes that the IT group is too focused on tools and technology, a distraction which serves as a barrier to achieving some of the company’s IG goals. Specifically, he observes that they are focused on (and rewarded for) the development and deployment of tools—not making sure employees know how to use them. Maybe it is not IT’s task alone to implement the training program, but without educating end users, the tools and technology will not solve the problems they are intended to fix.

Each facet of IG should try to step outside of its own box and consider where its role fits within the bigger IG picture. But achieving that equilibrium can be difficult, which is why having an IG steering committee is so important in the effort to reduce or eliminate siloes.

**BECOMING TOO RISK-FOCUSED**

IG is about more much more than controlling the risks and costs of information. It is about capturing the value side of information as well.

As with various facets of IG (e.g., e-Discovery, privacy, and compliance), organizations as a whole can become entrenched in a risk perspective. Dmitri’s company is predominantly focused on the risk side of information. This is not particularly surprising given the nature of the company and a triggering event that occurred several years ago and has been driving IG efforts ever since. But Dmitri’s company is also aware that the value half of the IG equation is currently underdeveloped.

Recently, the company conducted a maturity assessment. Dmitri ranked his company’s maturity level very low due to those value-side deficiencies. To get to the next maturity level on the scale they are using, Dmitri notes, his company would need to capture proper ownership for IG for the entire organization.

Right now, that ownership is split. Dmitri has the risk side, but he is not sure who is responsible on the business value side—or even if anyone is. These ambiguities are part of the problem. But since Dmitri and his company are at least aware that they need to develop the value side better, they are taking an essential step toward moving their IG program forward.

**PRACTITIONER TIPS**

**EXPAND YOUR HORIZONS**

Various functional areas of IG, or facets, become entrenched (or “siloed”) in their own perspectives with respect to how information is handled. To avoid a similar fate, try to think outside the box limited to your role with respect to IG. See how what you are doing fits within the larger picture and encourage other stakeholders to do so as well. Remember, shattering silos is easier said than done, which is why forming an IG steering committee is critical.
“To get to the next level, we need proper ownership of IG for the whole enterprise. Right now, it’s split. I have the risk half, and I’m not sure who has the business value half.”

—Dmitri, Head of Information Risk and Privacy at a Fortune 500 Chemical Company

**DO NOT FORGET THE VALUE SIDE**

It is easy for different IG facets to become entrenched in a risk perspective. This limits their ability to realize the value side of IG. Be aware that the potential to become entrenched exists and ask yourself and your IG team if you have. Including people from both perspectives on IG steering committees and other teams is essential to ensuring you do not lose sight of the big picture. Successful IG programs consider both perspectives.
Gaining Momentum Through Change

BENCHMARK SNAPSHOT

**Vertical:** Publishing  
**Size:** 1-1,000  
**Program Maturity Rating:** 3 – Defined (Self Ranking) / 3 – Defined (Our Ranking)  
**2014 IG Budget:** $150,000  
**2015 IG Budget:** $150,000

BENCHMARK OVERVIEW

Charlene is a records management leader at a national magazine. Though the organization does not call her work “IG,” much of what she does would fall under the IG umbrella. She recently completed a comprehensive retention schedule that included the identification of PII and vital records. Currently, her company is implementing its retention schedule and training employees.

Charlene recently completed a proof of concept with two different products to manage electronic records. She has also done a data mapping project and performed a privacy gap analysis. Charlene says competing priorities and a lack of IG value-add awareness impede projects.

WHAT’S IN A NAME?

Titles matter in all disciplines. When Charlene started her job, she was a “records manager.” Today, she has added the word “information” to her title, making it clear her role is much broader than simply handling physical records.

Soon she was tasked with taking on a privacy function—a particularly important role for a magazine interested in targeted marketing but concerned about identity theft. The title change alone was not enough, as Charlene feels limited in her role. She thinks records management will still only be considered as disposition management while it should be considered as a way to enhance retrieval. So the reporting structure needs to be changed, too.

RE-EXAMINING REPORTING STRUCTURE

As seen elsewhere in this report, where an IG role sits influences how it is perceived. Its location also plays a role in how well IG can build alliances across the organization.

When Charlene started her job, her position reported to legal. At her suggestion, the reporting structure was changed and now sits in IT. The shift made it easier to integrate efforts into what IT was already handling (e.g., disaster recovery and data security) and to integrate better with other parts of the company with which IT already had stronger relationships. IT was already interfacing with the business side when new processes were being implemented, creating an opportunity to build in IG at the start of projects. In contrast, legal was not generally involved at the outset of new projects.

“If a department is going to enhance retrieval, they wouldn’t think to bring us in. They think of records management as disposition management, not enhancing retrieval.”

-CHARLENE, RECORDS MANAGEMENT LEADER AT A NATIONAL MAGAZINE

PRACTITIONER TIPS

**TITLES MATTER**

What you call a role can affect its perception. Consider changing the title for an IG role to reflect both its current and desired function. For example, end users are most likely to listen to IG directives coming from the C-suite.

**LOCATION MATTERS**

Some departments have better relationships with relevant groups than others, so where IG actually sits in an organization is important. Consider shifting your reporting structure to optimize existing relationships and to facilitate the maximum effectiveness of an IG program.
“This benchmarking report provides thoughtful analysis with meaningful metrics to back it up. And more importantly there is a story being told that helps us build the tools to bring IG into our organizations in the best manner possible.”

—LAUREN BARNES, VICE PRESIDENT FOR RECORDS & INFORMATION MANAGEMENT AT CREDIT SUISSE
“The resounding concept that anyone should take away from these IG case studies is that every organization must start somewhere. Whether the initiative is big or small, tactical or strategic, that first IG win can lead to truly transformative information risk reduction.”

- DUKE ALDEN, JD, VP AND GLOBAL HEAD OF INFORMATION PROTECTION & GOVERNANCE AT AON SERVICE CORPORATION
Using Technology Changes to Push IG

BENCHMARK SNAPSHOT

**Vertical:** Information Technology

**Size:** Over 10,000 employees

**Program Maturity Rating:** 3 – Defined (Self Ranking) / 3 – Defined (Our Ranking)

**2014 IG Budget:** Unreported

**2015 IG Budget:** Some increase expected

BENCHMARK OVERVIEW

Alison is an IG leader at a global information technology services and solutions company. She is part of the information assurance group and the primary point of contact for IG. There is growing support for IG, including an IG-titled role for her position. Her primary responsibility is to lead strategic thinking and implementation for IG.

While records and information management (RIM) falls within her group, other IG areas like e-Discovery, data privacy, and information security currently do not. However, those IG sub-disciplines do seek alignment with each other. Alison describes herself as an IG “mole” in those interactions, as someone who advances the IG agenda by making sure she is at the table. The term “information governance” is gaining recognition from senior leaders within the company.

TECHNOLOGY TRANSITION = IG OPPORTUNITY

Implementing IG policies and practices that require people to change the way they work can be disruptive. Taking advantage of transitions that are already happening is one way to avoid this problem.

Alison’s company, like many others, is in the process of transitioning to Microsoft’s Office 365®. She is using the transition to validate that IG measures are in place and to add new ones. Part of the process includes ensuring that current policies and requirements are incorporated and determining whether these need to be revised. They are also establishing IG requirements for other environments like SharePoint®. The company is doing data remediation as part of the migration and addressing the impact of remediation decisions on legal holds already in place. Finally, they are addressing the impact the transition will have on the offboarding of employees. The transition to the cloud provides an opportunity to evaluate and improve their IG practices and policies.

Restructuring Leads to Rethinking IG

IG programs can grow out of almost any area of an organization, and we have seen efforts begin in various functions of a company, including legal, records and information management (RIM), IT, and so on. Even so, where an IG role sits may have a significant impact on the support it receives and how people think of it.

Alison began her work in RIM. She then introduced the concept of IG to her company. While she did have pockets of support, she still put together a proposal explaining why IG was needed and what disciplines it should include.

During a series of restructurings, her role shifted back and forth from being located in administrative service to being under information assurance (reporting to the CIO), where she is now. She finds that working in the office of the CIO is much more productive and successful, with the CIO supporting the idea of IG at the company. The level of support she is receiving now would quite frankly not have been possible working out of the administrative services group.

“The digital revolution has forced us all to work together.”

—ALISON, IG LEADER AT A GLOBAL INFORMATION TECHNOLOGY SERVICES AND SOLUTIONS COMPANY

PRACTITIONER TIPS

BE OPPORTUNISTIC

Major shifts in IT environments, including the unstoppable move to the cloud, create fabulous opportunities to build IG into the business. Use technology rollouts and migrations as opportunities to review existing IG policies and practices and to implement new ones. Taking advantage of existing transitions like these can avoid working against your business process and instead work within in it.

PUSH FOR POSITIONING

Reporting relationships matter. Especially when building outward from a RIM program that may be rooted in a physical records legacy, it is important to find the right home. IT and legal are common options with attendant pros and cons. Seek support from parts of the organization whose interests align with IG.
Effective IG Rules Require Compliance

**Benchmark Snapshot**
- **Vertical:** Telecommunications
- **Size:** Over 10,000 employees
- **Program Maturity Rating:** 3 – Defined (Self Ranking) / 2 – Repeatable (Our Ranking)
- **2014 IG Budget:** Unreported
- **2015 IG Budget:** Unreported

**Benchmark Overview**
Tom is corporate counsel with IG responsibility at a Fortune 500 satellite television company. He is currently in the process of putting in place a new IG and records retention policy. The existing policies were out of date and revamping them is a high priority. The company is also implementing a legacy data remediation project specifically targeted at information that was being held for now-expired legal holds. The company as a whole considers IG a priority.

**Rules Are Useless If People Do Not Follow Them**
The best-written IG directives are worse than useless if people do not follow them. Making sure that employees understand the rules and can implement them is an important first step. Making sure they do implement them, however, is essential.

Tom is very aware of these issues, and as he works on updating the policies, he is thinking about training, change management, and technology to implement and monitor IG compliance.

“**This time next year we will be in a better place with IG because we’ll have updated policies and schedules in place. We’ll have training done. We’ll have monitoring and compliance in place and software to help with HR files.”**

—Tom, corporate counsel with IG responsibility at a Fortune 500 satellite television company

**Practitioner Tips**

**Selling IG**
Tom effectively used “a combination of the cost of excess data, litigation outcomes that were not helped by the condition of our data, cognizance by senior leadership of the cause-and-effect relationship between excess data and cost and/or disorganized data and bad results,” to sell IG at his organization. You should do the same.

**Measure Metrics**
Great IG policies and procedures are useless if people do not follow them. Invest in compliance monitoring capabilities. The results of the monitoring can be paired with rewards and penalties, as appropriate, to increase compliance.
The All-Inclusive Approach

**BENCHMARK SNAPSHOT**

**Vertical:** Technology

**Size:** Over 10,000 employees

**Program Maturity Rating:** 4 – Managed (Self Ranking) / 4 – Managed (Our Ranking)

**2014 IG Budget:** Unreported

**2015 IG Budget:** Unreported

**BENCHMARK OVERVIEW**

Holly is the associate general counsel at a major information technology company. In her role, she deals with the preservation of information for litigation and investigations and advises on issues related to the information life cycle.

The company’s IG program is relatively advanced (maturity rating of 4 – managed). They have an IG steering committee in place, a RIM group that is well-aligned with privacy and security, and an ERM system. They also give lots of training. Holly’s group has moved away from unstructured to structured systems. Her company is currently implementing a preservation notification system and is upgrading its ERM system.

**TOP-DOWN SUPPORT FOR IG**

As noted elsewhere in this report, having strong executive-level support for IG efforts is one of the most effective ways to move an IG program forward. Without high-level support, IG programs can falter even if other favorable elements are secured. The IG program at Holly’s company serves as an example of what can be achieved when IG receives strong top-down support.

The program Holly describes is quite advanced. She says the impetus for it began several years ago in the compliance department. Her company had a compliance program (internal audit) that rated maturity levels and identified gaps. The head of the department drove the efforts, but it is unclear if any triggering events were behind those efforts.

However, Holly says that the top-down support IG received was key. When she started at the company, RIM was a separate group, but it got rebranded into an IG steering committee, along with other facets like privacy and compliance.

“We are much more about balancing the voices now—much different than a siloed approach.”

—HOLLY, ASSOCIATE GENERAL COUNSEL AT A MAJOR INFORMATION TECHNOLOGY COMPANY

**PRACTITIONER TIPS**

**THE POWER OF C-SUITE BUY-IN**

Executive-level support for IG is one of the most effective ways to move projects forward. Such support is virtually essential for an IG program to succeed. Focus on selling executives on the merits of your IG efforts. You will still have to build support from the ground up, but any program—even those with buy-in at the ground level—will likely fail without executive sponsorship.
The Evolution of a Lean IG Machine

**BENCHMARK SNAPSHOT**

**Vertical:** Telecommunications  
**Size:** Over 10,000 employees  
**Program Maturity Rating:** 3 – Defined (Self Ranking) / 3 – Defined (Our Ranking)  
**2014 IG Budget:** $1.5 million  
**2015 IG Budget:** $1.5 million or less

**BENCHMARK OVERVIEW**

Michael is an IG leader at a global telecommunications and electronics company. He has a small, lean team within information security handling a broad range of responsibilities, including compliance (e.g., auditing, discovery, and internal defensive monitoring); governance (e.g., information security and RM policies and controls, supplier contract support, and training); and legal IT delivery and architecture. Not expecting an increase in the resources available to him, he focuses his efforts on improving IG efficiency.

**A SIMPLIFIED APPROACH TO IG**

While updating policies and procedures is a common early project for any organization getting started with IG, those changes do not have to create a more complex set of rules. It is not uncommon for rules to become too granular. Remember, simplifying the rules makes it easier for employees to follow them, making policy goals more attainable. (For example, developing rules based on broad categories may be a more sensible approach than doing so on a document-by-document basis.)

Michael is working on a project that involves reconciling existing information security controls. Currently, there are so many rules in place that end-user compliance and proper auditing are nearly impossible. End users cannot comply with rules they do not understand, and sometimes they will not comply if the rules are too complex or hard to implement. To improve end-user compliance, Michael plans to reduce the overall number of rules.

**AN ORGANIC IG PROGRAM**

Successful IG programs do not necessarily have to be sold internally. Sometimes natural drivers encourage companies to adopt IG. At Michael’s organization, there were no turf wars. Instead, “a lot of little fires” drove IG, he says. There was also an “emotional incident”—litigation—followed by a government investigation that got people refocused on IG. Michael did not have to make the business case; it came to him. (Regulations are an example of a driver that would not necessarily involve a crisis.) Additionally, Michael’s boss had a vision of creating a more integrated IG program.

The combination of these natural drivers, along with some basic support and a good team, allowed Michael’s program to evolve more organically. No one welcomes litigation merely to integrate their organization’s IG efforts. However, learning from the experiences of others—particularly those in related industries—is a clear alternative. If your industry is fraught with government investigations and litigation, chances are your company will experience them, too. You will be better positioned to respond if you have learned from other companies’ experiences.

**SOFT BENEFITS OF IG**

While many organizations focus on the financial benefits of IG, others focus on soft benefits. Michael’s efforts are more focused on the delivery of services. He uses customer satisfaction as a key measure of success. According to Michael, some stakeholders (e.g., IT) frown on the lack of available metrics while others only care about the deliverables. It is easier to build support for your IG efforts when you know how all stakeholders measure IG success.

“We focus more on delivery than on metrics—getting the job done rather than measuring.”  
—Michael, IG leader at a global telecommunications and electronics company

**PRACTITIONER TIPS**

**EFFECTIVENESS OF SIMPLE STRATEGIES**

IG is not about the proliferation of new rules and increasing their complexity. It is about governing information better. Sometimes the most effective IG strategy is simplifying and reducing existing rules. This makes end-user compliance easier.
BE PREPARED AND OPPORTUNISTIC

There are some natural drivers that can make the business case for IG (e.g., regulation, litigation, and investigations). Some of these drivers can sideswipe a company if it is unprepared. So look at your industry and learn from the experiences of similarly situated organizations. Do not be caught off guard.

DO NOT FORGET “SOFT” BENEFITS

The measurement of IG success should include soft benefits. While your IG program must include metrics and other “hard” measures of success, “soft” ones should also be considered. Customer satisfaction, for example, can be more important in selling stakeholders on the value of IG. Have both measures of success at your disposal when you present your case for any IG project or initiative.
Would you like to be included in next year’s benchmarking study? Contact us at info@iginitiative.com to schedule an interview or join the IGI Community at www.iginitiative.com/join to learn more about this and other upcoming research that you can participate in.
IGI SPECIAL INTEREST GROUPS

The IGI is developing a series of vertically focused special interest groups within the IGI Community. The purpose of these groups is to bring together IG practitioners within specific verticals to share best practices, benchmarking information, and more. If you are interested in joining a special interest group or would like to start a special interest group based on your vertical, contact info@iginitiative.com.
Endnotes

Note that we have used the following numeric convention for survey data throughout this document: results that included half a percentage point or more were rounded up, and results below half a percentage point were rounded down. As such, in some cases aggregated results for particular questions do not add up to 100%.

This work should be cited as: “Stories in Information Governance: The IGI 2015 Benchmarking Report” (Information Governance Initiative LLC., May 2015).

Thank you to our survey respondents for graciously sharing their knowledge, experience, and data.

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