

Quick Wins in Information Governance

A pragmatic and proactive approach to regaining control of your data

From protecting sensitive customer data from cyber threats to complying with data protection laws, corporate information governance (IG) efforts are quickly becoming “must do” projects.

“ ...the rising incidence and frequency of data breaches, emerging laws including the EU’s General Data Protection Regulation (GDPR) and the impending impact of Brexit, give a clear indication that companies are facing a rising tide of data challenges...” ”

While most corporations have bought into the concept of IG, in practice it remains ethereal and abstract, with very little consistency from person to person in how it is managed, and most importantly, how it can be operationalised. As a result of this, there are often a lot of false starts.

The massive volumes and types of data in today’s corporations put a strain on legal and IT budgets, and further complicate organisational risk. There is little sign of any relief, as the International Data Corporation (IDC) predicts the world’s data will grow by 50 times within the next decade.

On top of this, the rising incidence and frequency of data breaches, emerging laws including the EU’s General Data Protection Regulation (GDPR) and the impending impact of Brexit, give a clear indication that companies are facing a rising tide of data challenges – one that is spreading beyond the purview of the IT department alone.

QUICK WINS IN INFORMATION GOVERNANCE

IG is defined by Gartner as “The specification of decision rights and an accountability framework to ensure appropriate behaviour in the valuation, creation, storage, use, archiving and deletion of information. It includes the processes, roles and policies, standards and metrics that ensure the effective and efficient use of information in enabling an organisation to achieve its goals”.

This serves as a reminder that data challenges and opportunities impact the entire organisation, and should be approached holistically by a team of key stakeholders across various departments. Yet most IG projects are tackled in silos.

Many of the issues that IG projects aim to address – legacy data remediation, streamlining e-discovery, compliant retention, defensible legal hold – ultimately impact the legal department, placing in-house counsel in an unique position to spearhead these initiatives. To help in-house legal teams achieve quick wins for IG projects, there are some important practical steps you should consider:

1 Get the Facts: It's essential for counsel to know where the company's data – especially the most sensitive data such as employee or customer information – resides within the organisation, and what rules and obligations apply to it. To help prioritise remediation, you can begin your data mapping initiative for areas of the business that are highly litigious. Working with key stakeholders in the business to help define where the different sources of data reside, how they are used, and where the data is flowing.

2 Secure Sponsorship: IG is a cross-stakeholder issue, and requires collaboration of many departments. Finding a single champion can be a challenge, but in-house counsel has an important role to play. Legal is well positioned to partner with the CIO, COO or other executive sponsors to fund and mobilise actions to operationalise IG policies.

3 Align Policies and Standards: A thorough review of company-wide policies and standards is another important step. This may include reviewing records management, information security, data protection, legal holds, back-up policies and more. It's important that these policies address information obligations holistically with clear roles and responsibilities, such as the Information Steward or Information Coordinator.

4 Align with Enterprise Wide Process: Another part of ensuring a holistic approach is to incorporate IG with other enterprise wide processes. For example engage with programme teams managing enterprise IT optimisation programmes to ensure litigation, retention, privacy and security requirements are addressed holistically.

5 Build a Roadmap: It's very easy to become overwhelmed by IG, especially for multinational corporations in heavily regulated industries. Define the scope, and make an action plan that is realistic within company culture and the existing technology foundation, so initiatives can be fully and effectively rolled out.

Information cost and risks are growing exponentially. The longer you wait to start your IG programme, the more painful it will be to bring things under control. Don't let perfection be the enemy of good – take small measured steps in the right direction and most importantly, get started.

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Sonia Cheng
Senior Director – Information Governance & Compliance Services
+44 (0)20 3727 1783
sonia.cheng@fticonsulting.com



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