

Leveraging Traditional RIM Practices



Greater Los Angeles Chapter of
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Session Agenda



Older Definition

The systematic control of records from their creation or receipt through their processing, distribution, organization, storage and retrieval to their ultimate disposition.



What is RIM?



Modern Definition

A program within an organization that provides a comprehensive strategy and plan with a set of requirements for the systematic control of the creation, use, maintenance and disposition of Records and Information regardless of media.

Traditional RIM Components



- ❧ Ownership and accountability
- ❧ Classification/organization
- ❧ Security and protection
- ❧ Retention
- ❧ Access rights
- ❧ Processes and Controls

RIM Role



☞ **Historically** was associated with paper

– Why

☞ Tactical

☞ Visible

☞ Enabled employees to “hand off”
responsibility to RIM

RIM Role



- ❧ **Current** – employees retain (should) a level of responsibility
 - ❧ RIM needs to apply same principles in the electronic world
 - ❧ RIM does not need to “do it” – move from tactical to influence to strategist
 - ❧ Design/participate in rethinking the management of all information and the processes

Mistakes of RIM Managers



- ❧ Hiding in the office – not getting engaged with business, IT and Legal
- ❧ Being legalistic – Really! Is being right more important than moving people to better compliance
- ❧ Not trying to understand the technology – not being a program, but knowing what it does

More Mistakes of RIM Managers



- ❧ Being *toooooo* tactical – not garnering strategic skills and knowledge
- ❧ Talking the lingo of RIM, not the lingo of the customer
- ❧ Not being able to distinguish records from non-records

More Mistakes of RIM Managers



- ❧ Over-focusing on paper, the bulk of records and information is paper
- ❧ Being so rigid that they cannot be an influence on technology selection and implementation – Not understanding the “End Game”

More Mistakes of RIM Managers



- ❧ Not being the program's champion on success, politically capitalizing on accomplishments
- ❧ Not listening to the business – where are the pain points
- ❧ Not connecting the RIM principles to technology implementation

RIM at The Table



RIM is needed to assist with :

- ❧ Vendor Selection – what are the requirements that a vendor must meet – classification, security, access, workflow, etc.
- ❧ System Implementation and testing – doing it right
 - ❧ “system” – configuration and testing
 - ❧ “System” – including process changes and governance, because System – is the proof that you are compliant

Leveraging traditional RIM for technology



Start With a Common Language

Words Matter!

- ❧ Offsite storage and technology vendors have their own vernacular – find the common ground
- ❧ Retention vs. retention
- ❧ Lifecycle of data vs. media
- ❧ Format vs. format
- ❧ Compliance – what does this mean for the organization (not just RIM)

Start With a Common Language



Words Matter!

1. Create a program/project glossary for IT/Legal/RIM/Vendors – **Only One!**
2. Engage all parties for input and review
3. Publish the glossary and use the terms in documents

Questions RIM Asks



1. What are the values of information to the organization?
2. Who has ownership of the information?
3. How long do these values last?
4. Are there sensitivity or privacy issues?
5. Who needs the information?
6. What is the “**Right**” level of protection?
7. Where is it located?

Questions RIM Asks



1. What are the values to the organization?
 - ∞ Use of information
2. Who has ownership of the information?
 - ∞ Accountability
3. How long do these values last?
 - ∞ Retention
4. Is there sensitivity or privacy issues?
 - ∞ Protection
5. Who needs the information?
 - ∞ Accessibility
6. Where is it located?
 - ∞ Findability

Information Concerns



OLD

- ❧ Legal and Risk
- ❧ Financial
- ❧ Operations
- ❧ Historical
- ❧ Volume
- ❧ Technology stability

NEW

- ❧ Litigation
- ❧ Risk
- ❧ Confidentiality
- ❧ Privacy
- ❧ Availability
- ❧ Technology stability
- ❧ Obsolescence
- ❧ Scalability
- ❧ Financial

Hot Data Topics



- ❧ Data Analytics
- ❧ Unabated Growth
- ❧ Abandoned/Orphaned Information
- ❧ Dark Data
- ❧ Leadership Changes - loss of institutional knowledge
- ❧ IOT
- ❧ Personal vs. Company equipment/data
- ❧ Litigation Madness

Vendor Issues



- What keeps you up at night about your vendors?
- ❧ Do they understand your responsibilities?
 - ❧ Do they have the right controls for protection?
 - ❧ Are they responsive to you?
 - ❧ CAN THEY provide the mechanisms to delete/destroy obsolete data?
 - ❧ Do they show integrity?
 - ❧ What is their focus: **service or profit?**

Basic Concepts



- ❧ Rules apply to the data – not the media
- ❧ Email is a delivery system – not a determination of record vs. non-record
- ❧ You can't touch it – so you have to influence others who do!

RIM Components that Help



- ❧ Classification
- ❧ Retention
- ❧ Protection
- ❧ Accountability/Ownership
- ❧ Process Controls - workflow

Data and RIM Application



- ∞ Data Analytics – Classification – faster analytics
- ∞ Unabated Growth – Retention – removal of obsolete data
- ∞ Abandoned/Orphaned Information – Retention
- ∞ Dark Data – Classification – record vs. non-record

Data and RIM Application



- ∞ Leadership Changes – loss of institutional knowledge – **Classification and Ownership**
- ∞ IOT – **Classification and Protection and Controls**
- ∞ Personal vs. Company equipment/data – **Ownership**
- ∞ Litigation eDiscovery – **Classification and Protection**

Using RIM for Vendor Selection



- ❧ Business and functional requirements – RIM components should be added
- ❧ Understand functionality of the system – including workflow
- ❧ Determine vendor's understanding and experience in applying requirements
- ❧ Ease of use – build on past success of the vendor
- ❧ Can the system minimize end user decision points?

Classification



Classification Plans are needed by vendors to apply the RIGHT LEVEL of control

- ❧ Traditionally called Retention Schedules BUT THEY ARE SO MUCH MORE
- ❧ Organizing structures
- ❧ Define retention
- ❧ Identify classes of PII
- ❧ Assign confidentiality by class

RIM and Electronic Information



- ❧ Eliminate abandoned and obsolete information with retention requirements designed into systems
- ❧ Decommissioning procedures that identify the status of data and eliminate obsolete data based on retention
- ❧ Exiting employee procedures to eliminate abandoned data – obsolete or redundant (may be non-records) – Ownership assignment

Designing Protection



These decisions need to be made up front and in the design.

- ❧ What level should security be set?
- ❧ Access - who has rights to read, print, edit?
- ❧ Monitoring
- ❧ Changes through approval process - only



Takeaway Points



- ❧ The basics of any traditional RIM program still apply
- ❧ BUT, the application is very different
- ❧ There are now multiple environments that need RIM rules and principles – not just one
- ❧ RIM Practitioners must learn what the technology does
- ❧ RIM Practitioners have to learn multiple languages and strive to come to common ground for your organization

Thank You!



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