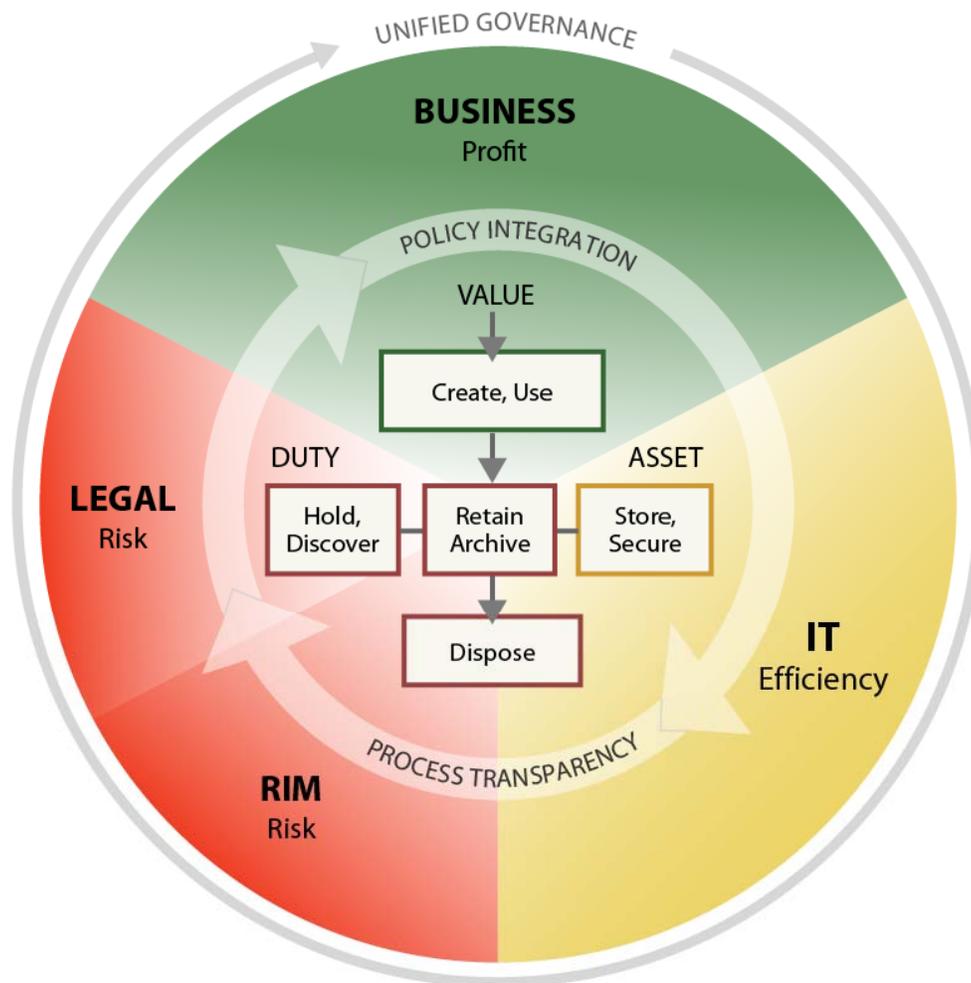# E·D·R·M

The Electronic Discovery Reference Model (EDRM)

How the Information Governance Reference Model (IGRM) Complements ARMA International's Generally Accepted Recordkeeping Principles (GARP®)

December 2011

Information Governance Reference Model (IGRM)

Linking duty + value to information asset = efficient, effective management

Duty: Legal obligation for specific information

Value: Utility or business purpose of specific information

Asset: Specific container of information

Information Governance Reference Model / © 2011 / v2.1 / edrm.net

INTRODUCTION

The EDRM.net Information Governance Reference Model (IGRM) depicts a framework for unified information governance by an organization's leadership and key stakeholders.

The IGRM supports ARMA International's GARP® Principles[1] by identifying the cross-functional groups of key information governance stakeholders and by depicting their intersecting objectives for the organization. This illustration of the relationship between duty, value and the information asset demonstrates cooperation among stakeholder groups to achieve the desired level of maturity of effective information governance.

Gartner's definition of **information governance** provides us with a common understanding, informs how to utilize the IGRM when applying ARMA International's GARP® Principles:

> **Information governance** *is the specification of decision rights and an accountability framework to encourage desirable behavior in the valuation, creation, storage, use, archival and deletion of information. It includes the processes, roles, standards and metrics that ensure the effective and efficient use of information in enabling an organization to achieve its goals.[2]*

ARMA International and the EDRM.net advocate the importance of information governance. Both organizations also recognize that practitioners need tools to support information governance initiatives.

By identifying the synergy between the ARMA International GARP® Principles, the ARMA International Information Governance Maturity Model[3] and the EDRM Information Governance Reference Model (IGRM)[4], the organizations offer the collaboration necessary to attain a transformational level of information governance.

In this white paper we elaborate on the many business benefits an organization will realize through continued proactive adoption of ARMA International's Generally Accepted Recordkeeping Principles (GARP®). We also cover how the IGRM supports these principles and enables an organization to achieve the desired level of maturity on ARMA International's Information Governance Maturity Model.

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[1] The Generally Accepted Recordkeeping Principles®, http://www.arma.org/garp
[2] "What is Information Governance? And Why is it So Hard?" by Debra Logan, January 11, 2010, http://blogs.gartner.com/debra_logan/2010/01/11/what-is-information-governance-and-why-is-it-so-hard
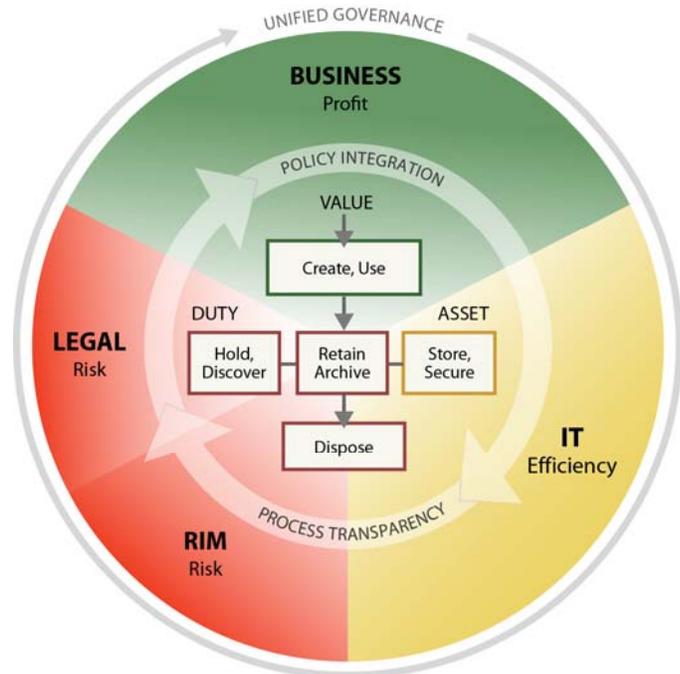[3] ARMA International's Information Governance Maturity Model, http://www.arma.org/garp/Garp%20maturity%20model.pdf
[4] EDRM.net's Information Governance Reference Model (IGRM), http://www.edrm.net/projects/igrm

GARP® Principles and the IGRM diagram

Within a mature organization, the GARP® principles are integral to the overall recordkeeping program.

Eight (8) GARP® Principles[5] guide information management and governance of record creation, organization, security maintenance and other activities used to effectively support recordkeeping of an organization.

1) **Accountability**
2) **Transparency**
3) **Integrity**
4) **Protection**
5) **Compliance**
6) **Availability**
7) **Retention**
8) **Disposition**

The IGRM depicts – that typically – the BUSINESS stakeholder is primarily responsible for Profit; meaning they are primarily responsible for achieving the mission or goals of the organization. BUSINESS, therefore, has the responsibility to declare the specific value of information to the degree to which it helps drive the purpose of the enterprise itself.

The IGRM depicts IT as primarily responsible for storing and securing the information under their management. So generally IT endeavors to increase Efficiency because they are typically under pressure to lower cost. The IGRM depicts RIM and LEGAL as addressing different factors affecting Risk. LEGAL is responsible for defining what information to hold and collect for discovery, while RIM is typically responsible for ensuring that regulatory obligations for information are met.

Proactive Organizations

Proactive organizations will inspire transformation with increasingly optimized information governance. The GARP® principles serve as underpinnings for an organization's information handling best practices. As a qualitative benchmark for progressive improvement, the ARMA International's Information Governance Maturity Model enables assessment and measurement of an organization's progress as it continuously improves its overall information governance. Intelligent information governance creates value by enhancing technological efficiencies and related processes.

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[5] A useful pneumonic to recall the eight GARP® Principles is "A TIP CARD"

E·D·R·M

How the Information Governance Reference Model (IGRM) Complements ARMA International's Generally Accepted Recordkeeping Principles (GARP®)

EFFECTIVE INFORMATION GOVERNANCE

Effective information governance requires a continuous and comprehensive focus. The IGRM will be used by proactive organizations as an introspective lens to facilitate visualization and discussion about how best to apply the GARP® principles. The IGRM puts into sharp focus the GARP® principles and provides essential context for the Maturity Model.

This simplified chart illustrates how an organization could assign ownership for upholding the GARP® principles. In a highly mature organization, the goal should be shared ownership across many of these principles.

GARP® Principle	BUSINESS	IT	RIM	LEGAL
Accountability	Owner			
Transparency	Shared Owner	Shared Owner	Shared Owner	Shared Owner
Integrity	Shared Owner	Shared Owner	Shared Owner	Shared Owner
Protection		Owner		
Compliance				Owner
Availability		Shared Owner	Shared Owner	
Retention			Owner	
Disposition			Owner	

The Maturity Model defines characteristics of recordkeeping programs, with specific reference to the GARP® principles, using the following five (5) levels as a spectrum for measurement:

Maturity Model: Levels of Effective Information Governance[6]

Level 1 (Sub-standard): This level describes an environment where recordkeeping concerns are either not addressed at all, or are addressed in a very ad hoc manner. Organizations that identify primarily with these descriptions should be concerned that their programs will not meet legal or regulatory scrutiny.

Level 2 (In Development): This level describes an environment where there is a developing recognition that recordkeeping has an impact on the organization, and that the organization may benefit from a more defined information governance program. However, in Level 2, the organization is still vulnerable to legal or regulatory scrutiny since practices are ill-defined and still largely ad hoc in nature.

Level 3 (Essential): This level describes the essential or minimum requirements that must be addressed in order to meet the organization's legal and regulatory requirements. Level 3 is characterized by defined policies and procedures, and more specific decisions taken to improve recordkeeping. However, organizations that identify primarily with Level 3 descriptions may still be missing significant opportunities for streamlining business and controlling costs.

Level 4 (Proactive): This level describes an organization that is initiating information governance program improvements throughout its business operations. Information governance issues and considerations are integrated into business decisions on a routine basis, and the organization easily meets its legal and regulatory requirements. Organizations that identify primarily with these descriptions should begin to consider the business benefits of information availability in transforming their organizations globally.

Level 5 (Transformational)[7]: This level describes an organization that has integrated information governance into its overall corporate infrastructure and business processes to such an extent that compliance with the program requirements is routine. These organizations have recognized that effective information governance plays a critical role in cost containment, competitive advantage, and client service.

The following sections address each GARP® Principle individually to expand upon the relationships between the stakeholders and to highlight ARMA's key considerations for organizations that want to pursue a higher level of maturity on the ARMA Information Governance Maturity Model.

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[6] Source: ARMA International's Information Governance Maturity Model at http://www.arma.org/garp/metrics.cfm
[7] Not every organization needs to aspire to Level 5. Good information governance can be achieved at Level 4 – and even Level 3. Organizations with greater risk tolerance or smaller litigation portfolios might be sufficiently well-served by Level 4.

Accountability

The GARP® Principle of Accountability states:

An organization shall assign a senior executive who will oversee a recordkeeping program and delegate program responsibility to appropriate individuals, adopt policies and procedures to guide personnel, and ensure program auditability.

The IGRM provides an organization with a communication model to guide decisions by senior executives accountable for essential activities of an organization. A coordinated effort across stakeholders can be achieved with senior executive buy-in and oversight as outlined in the unified governance aspect of the model.

Although all stakeholders are part of an Accountability program, the primary owner of the GARP® Principle of Accountability is BUSINESS, as representative of the organization's senior executives. Often times RIM is responsible for oversight of this principle.

Using the IGRM and ARMA's Accountability principle together can enable a more proactive approach to mitigate risk and uncover deficiencies in recordkeeping before they are identified through a litigation event, regulatory investigation/audit or other risk exposure.

Accountability According to GARP® – Level 5 Transformational Maturity

- ✓ The organization's senior management and its governing board place great emphasis on the importance of the program.

- ✓ The records management program is directly responsible to an individual in the senior level of management, (e.g., chief risk officer, chief compliance officer, chief information officer) OR,

- ✓ A chief records officer (or similar title) is directly responsible for the records management program and is a member of senior management for the organization.

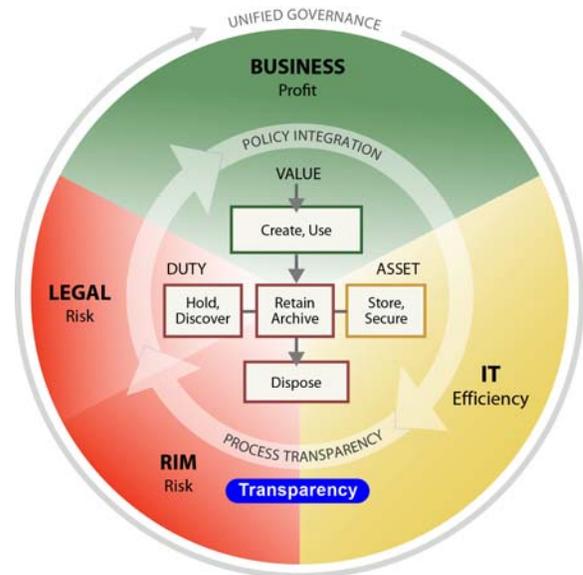- ✓ The organization's stated goals related to accountability have been met.

Level 5 Transformational Maturity for the GARP® Principle of Accountability is achieved when the organization's senior management and its governing board consult with recordkeeping professionals and IT experts about key decisions that pertain to its recordkeeping program. To reach Level 5, the records management program must be directly responsible to an individual in the senior level of management, e.g., Chief Risk Officer, Chief Compliance Officer, or Chief Information Officer. At Level 5, the organization's senior management and governing board greatly emphasize the importance of its recordkeeping program.

Transparency

The GARP® Principle of Transparency states:

The processes and activities of an organization's recordkeeping program shall be documented in an understandable manner and be available to all personnel and appropriate interested parties.

At the core of the IGRM is Process Transparency and Policy Integration. IGRM recognizes that there are many stakeholders representing the functional groups (BUSINESS, IT, RIM and LEGAL) and that information governance efforts can be crippled by insufficient collaboration among key stakeholders or failure to integrate policy.

Process Transparency in the IGRM entails shared ownership and execution, promotes an understanding of the role of the stakeholders in information governance and posits that true information governance can only be achieved through successful collaboration with other groups across the enterprise.

Policy integration in the IGRM entails formalizing a common set of goals and rules that promote cross functional communication, collaboration, and optimization.   As a result, the key stakeholders will have a greater awareness of each group's accountability, responsibility, and the overall impact on collectively providing effective and cohesive unified information governance.

Transparency According to GARP® – Level 5 Transformational Maturity

- ✓ The organization's senior management considers transparency as a key component of information governance.

- ✓ The organization's stated goals related to transparency have been met.

- ✓ The organization has implemented a continuous improvement process to ensure transparency is maintained over time.

- ✓ Software tools that are in place assist in transparency.

- ✓ Requestors, courts, and other legitimately interested parties are consistently satisfied with the transparency of the processes and the response.

Level 5 Transformational Maturity for the GARP® Principle of Transparency can only be achieved when an organization's senior management considers transparency as a key component of information governance. As a positive indication that the organization's stated goals related to transparency have been met, requestors, courts, and other legitimately interested parties will be consistently satisfied with the transparency of the processes and response of the organization.
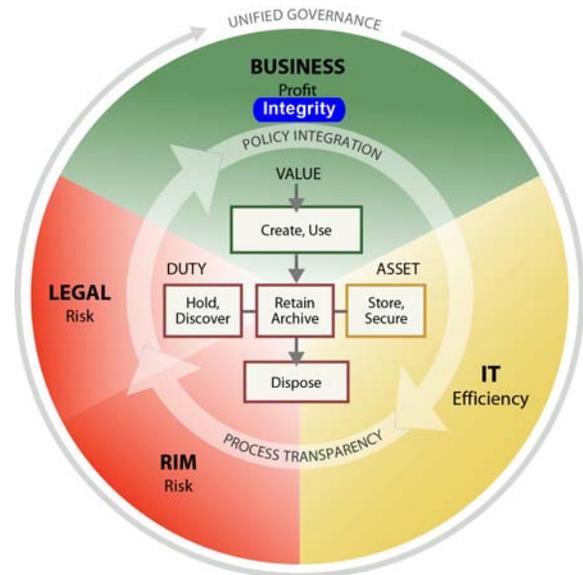
Integrity

The GARP® Principle of Integrity states:

A recordkeeping program shall be constructed so the records and information generated or managed by or for the organization have a reasonable and suitable guarantee of authenticity and reliability.

The IGRM supports the GARP® principle of integrity and the responsibility of legal duty, referring to a wide range of legal and regulatory constraints and obligations, from e-discovery and government regulation, to contractual obligations such as payment card industry requirements.

While RIM is the likely owner of this principle, because it is the stakeholder responsible for the reliability of the organization's recordkeeping program, the IGRM illustrates the necessary collaboration with IT for the execution of Integrity who must appropriately manage the organization's information; ensuring authenticity, privacy, and security as well as appropriate retention as dictated by both business and legal or regulatory requirements.

Integrity According to GARP® – Level 5 Transformational Maturity

- ✓ There is a formal, defined process for introducing new record-generating systems and the capture of their metadata and other authenticity requirements, including chain of custody.

- ✓ This level is easily and regularly audited.

- ✓ The organization's stated goals related to integrity have been met. The organization can consistently and confidently demonstrate the accuracy and authenticity of its records.
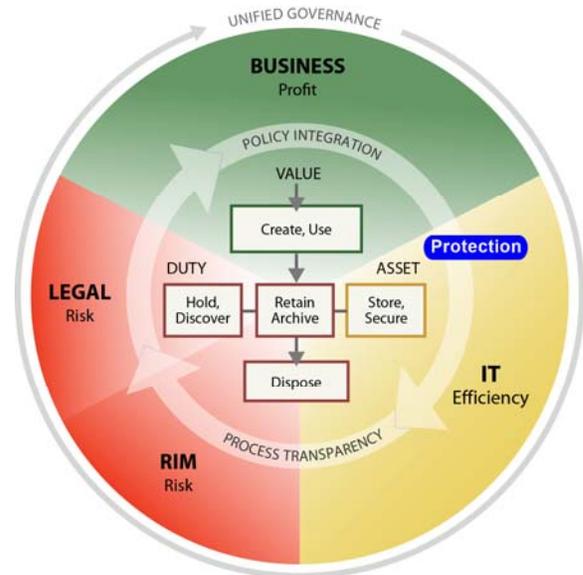
Level 5 Transformational Maturity for the GARP® Principle of Integrity exists when there is a formal, defined process for introducing new record-generating systems and the capture of their metadata and other authenticity requirements, including chain of custody. Level 5 organizations consistently and confidently demonstrate the accuracy and authenticity of its records, and their ability to prevent data spoliation.

Protection

The GARP® Principle of Protection states:

A recordkeeping program shall be constructed to ensure a reasonable level of protection to records and information that are private, confidential, privileged, secret, or essential to business continuity.

The IGRM compliments this GARP® principle by showing how organizations can decide what information assets need to be protected and to what extent, by attaching levels of value and duty, assigned by BUSINESS, IT, LEGAL and RIM stakeholders. IT is the stakeholder responsible for implementing and managing the environment for protecting an organization's information assets.

Protection According to GARP® – Level 5 Transformational Maturity

- ✓ Executives and/or senior management and the board place great value in the protection of information.

- ✓ Audit information is regularly examined and continuous improvement is undertaken.

- ✓ The organization's stated goals related to record protection have been met.

- ✓ Inappropriate or inadvertent information disclosure or loss incidents are rare.

Level 5 Transformational Maturity for the GARP® Principle of Protection is achieved when executives and senior management demonstrate the organization's commitment to the effective protection of its information. The organization's audit information will be regularly examined. A Level 5 organization meets its stated goals related to record protection. Inappropriate or inadvertent information disclosure should not happen.

Compliance

The GARP® Principle of Compliance states:

*The recordkeeping program shall be constructed
to comply with applicable laws and other binding
authorities, as well as the organization's policies.*

The GARP® Principle of Compliance is depicted
in the IGRM as the inner ring of process
transparency. LEGAL is the owner of this principle
because it is the stakeholder with the expertise to
define, interpret and ultimately make transparent
the applicable laws and other binding authorities.
RIM and IT coordinate to execute on the GARP®
Principle of Compliance. The processes of
auditing, monitoring and continuous improvement
must also be transparent for compliance with laws
and business policy.

Because the IGRM is a stakeholder model, it supports the activity of defining and integrating
the roles and processes for information management and discovery across the organization.

Compliance According to GARP® – Level 5 Transformational Maturity

- ✓ The importance of compliance and the role of records and information in it are clearly
  recognized at the senior management and board levels.

- ✓ Auditing and continuous improvement processes are well established and monitored by
  senior management.

- ✓ The roles and processes for information management and discovery are integrated.

- ✓ The organization's stated goals related to compliance have been met.

- ✓ The organization suffers few or no adverse consequences based on information
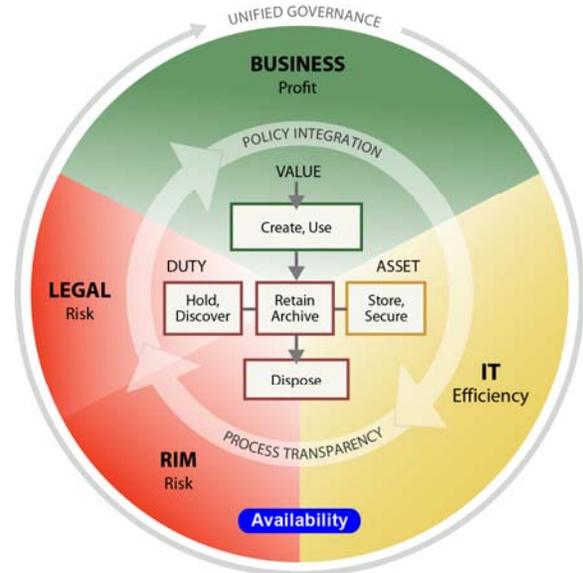 governance and compliance failures.

Level 5 Transformational Maturity for the GARP® Principle of Compliance can be achieved by
recognizing key stakeholder roles with regard to compliance. LEGAL and RIM are responsible
for defining the applicable laws and other binding authorities on the company. They are critical
to the discovery processes and managing legal holds. IT is also critical to the management of
legal holds for electronic information. BUSINESS and IT are responsible for defining the policies
of the organization, including the code of business conduct and goals related to compliance.

Availability

The GARP® Principle of Availability states:

An organization shall maintain records in a manner that ensures timely, efficient, and accurate retrieval of needed information.

IT is the technical owner of the GARP® principle Availability and is responsible for the execution of this principle, because it is the stakeholder that implements the information governance requirements for the organization. The IGRM facilitates discussion on use cases or specific examples of what records need to be made available and how fast. These questions are to be raised and discussed in connection with each activity box: Create, Use, Hold, Discover, Retain, Archive, Store, Secure, and Dispose.

In practical application, the principle of Availability is best considered simultaneously with or in the context of the other principles (Retention, Disposition, Compliance, Protection, Integrity).

RIM has an important role in managing the organization's information assets. RIM builds taxonomies and file plans that are critically important to the proper identification of information for business and litigation use. Data mapping is rooted in the business use of information assets, not simply part of the technical architecture. Therefore, ownership of the GARP® principle Availability is shared by IT and RIM.

Availability According to GARP® – Level 5 Transformational Maturity

- ✓ The senior management and board levels provide support to continually upgrade the processes that affect record availability.

- ✓ There is an organized training and continuous improvement program.

- ✓ The organization's stated goals related to availability have been met.

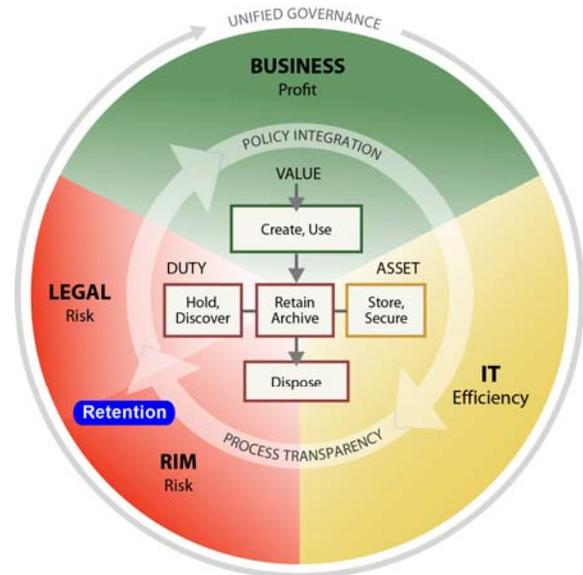- ✓ There is a measurable ROI to the business as a result of records availability.

Level 5 Transformational Maturity for the GARP® Principle of Availability is achieved when senior management and board levels provide support to continually upgrade the processes that affect record availability. The organization implements training and a continuous improvement program. Return on investment (ROI) is measurable and the organization's records are maintained in a manner that results in timely, efficient, and accurate retrieval.

Retention

The GARP® Principle of Retention states:

An organization shall maintain its records and information for an appropriate time, taking into account legal, regulatory, fiscal, operational, and historical requirements.

The GARP® Principle of Retention is depicted in the IGRM as an intersecting priority, with RIM as owner with support from IT and BUSINESS. Retention is central to the information lifecycle and serves as the gateway between the creation of information, the duty to preserve, store, or secure the information, and its defensible disposal.

While RIM is the owner of Retention, with its sponsorship of the recordkeeping program, IT is involved in the execution of retention, because it controls the assets that house the information. The IGRM highlights the individual responsibilities of every stakeholder with regard to retention and links their respective "stakes" to this stage in the information lifecycle. LEGAL and RIM focus on risk and the legal retention obligations for specific information. This includes regulatory and fiscal requirements. BUSINESS, with attention to profit, focuses on the utility or business purpose of retaining specific information. This includes operational and historical requirements. Finally, IT is responsible for managing efficiency and controls the location of retention.

Retention According to GARP® – Level 5 Transformational Maturity

- ✓ Retention is an important item at the senior management and board levels.

- ✓ Retention is looked at holistically and is applied to all information in an organization, not only to official records.

- ✓ The organization's stated goals related to retention have been met.

- ✓ Information is consistently retained for appropriate periods of time.
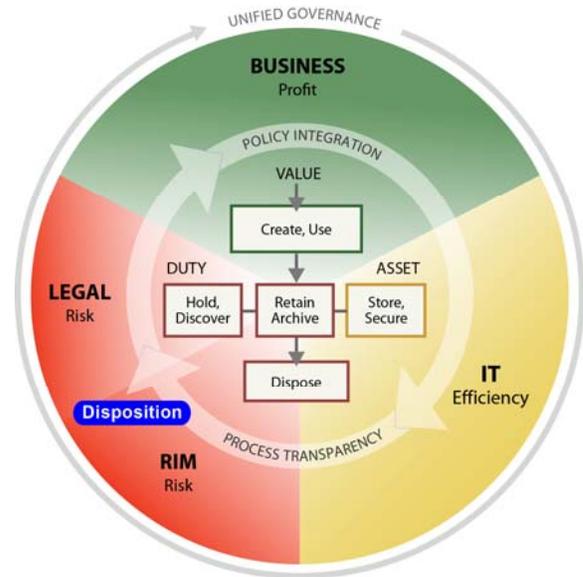
Level 5 Transformational Maturity for the GARP® Principle of Retention can be achieved by bringing transparency to LEGAL, RIM, BUSINESS, and IT retention processes. By linking the legal duty to retain information, the business value of retaining information, and the location of the retention, efficient and effective management of information will be accomplished.

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Disposition

The GARP® Principle of Disposition states:

An organization shall provide secure and appropriate disposition for records that are no longer required to be maintained by applicable laws and the organization's policies.

The GARP® Principle of Disposition is also depicted in the IGRM as an intersecting priority, with RIM as owner and IT supporting execution. The IGRM demonstrates that in order to dispose of any form of information, organizations need to know the value of that information to the different organizational stakeholders. Without a transparent process and linkage across all stakeholders, disposition is not a defensible business practice. By specifically defining process transparency and unified governance at the organizational level, disposition becomes an actionable task, reducing costs and risks of under and over retention.

Disposition According to GARP® – Level 5 Transformational Maturity

- ✓ The disposition process covers all records and information in all media.

- ✓ Disposition is assisted by technology and is integrated into all applications, data warehouses, and repositories.

- ✓ Disposition processes are consistently applied and effective.

- ✓ Processes for disposition are regularly evaluated and improved.

- ✓ The organization's stated goals related to disposition have been met.

Level 5 Transformational Maturity for the GARP® Principle of Disposition can be achieved by an organization when its disposition process covers all records and information in all media. This requires the disposition processes be consistently applied and effective. Regular evaluation and improvement is sought.

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CONCLUSION

While the IGRM is broad in focus, it illustrates key responsibilities and interdependencies of information stakeholders in an organization. As such, the IGRM complements the metrics defined by ARMA International's Information Governance Maturity Model.

- The IGRM is a powerful communication tool that promotes cross-functional dialogue and collaboration among stakeholder groups within an organization pursuing higher levels of information governance.

- The IGRM illustrates the relationship of key stakeholders (BUSINESS, IT, RIM, LEGAL) to each other – and to the Information Lifecycle.

- An organization's continuously improved recordkeeping can be positively transformative and lead to increased profitability.

Fundamentally, information governance is a business process. In order to lower risks and achieve greater efficiencies through process improvement, electronic discovery will increasingly become tightly integrated with an organization's information governance policy, procedures, and infrastructure.