WHITE PAPER

Using Microsoft 365 to Automate the Management and Execution of Your Records Retention Schedule

Part One

Abstract

Records management execution is a source of frustration for many companies. It is often difficult or even impossible to get employees to consistently follow records management requirements and procedures, especially for electronic information. One proven technology is a product that most companies already have—Microsoft's Microsoft 365 suite of productivity tools. Microsoft 365 can both drive higher compliance and make the entire records management process easier for everyone

Part One of this white paper examines real-world challenges companies face in implementing records management for electronic information, discusses which approaches are less successful, and summarizes Microsoft 365's records management capabilities. Part Two will review how Microsoft 365 can automate the management and publication of a records retention schedule, including automating records classification, disposition, and using Microsoft 365 to automatically propagate changes to a retention schedule.

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Contoural is an independent provider of information governance services. We do not sell any products, provide any reactive eDiscovery services, or store any documents. We do not take any referral fees, including but not limited to products such as Microsoft 365. We generate our revenue from strategic consulting services, enabling us to develop and recommend strategies driven not by a product or eDiscovery agenda, but rather an approach based exclusively on the needs of our clients.

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READY. COMPLIANT. IN CONTROL.

The Challenge and Despair of Managing Electronic Records

Managing corporate information in any format can be difficult. Although companies continue to accumulate large stores of paper records, the root of records management problems most often lies in managing electronic information. Many companies simply try to apply paper-based records processes for electronic information, which often ends in failure; the sheer volume of electronic information decreases the likelihood that any employee will follow a series of time-consuming manual steps contained in a paper-based records management process.

In addition, and discussed further below, many companies add to the time burden by setting up complicated records taxonomies and file plans, and employees cannot easily determine the correct way to store or classify records. Their fear is understandable: when they put their files into a document management system or other type of repository, they may not be able to find this information again.

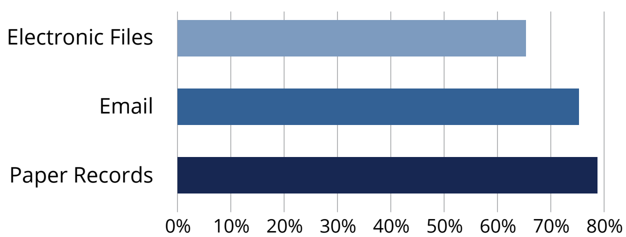

Figure 1. Average percentage of expired records and low-business-value information that can be deleted while maintaining compliance and retaining information still needed by the business.
Source: Contoural

As a result, some companies have effectively given up trying to manage electronic information, simply allowing is to accumulate in multiple repositories throughout the enterprise. This Redundant, Obsolete and Trivial information (ROT)—including expired records, copies of information, or information that simply has low or no business value—creates risks, increases costs, and lowers employee productivity.

The Five Second Rule

The average employee sends and receives 167 emails and more than 25 files each day. We find that employees will spend at most five seconds manually classifying a single document, and even that short period of time works out to more than an hour per week, per employee to classify information. If a manual records classification and management process takes longer, even well-intentioned employees will soon start ignoring the process. Manual classification worked better in a world of paper, but the large number of electronic documents employees touch each day has led many companies to adopt a simpler data placement strategy.

Automation Strategies to Avoid and Practices That Do Not Work

Effective automation is the path leading out of the records program morass. Yet as not all paths lead you where you want to go, not all automation strategies drive better compliance and information management. Some automation strategies—while seemingly easier and well-intended—lead us down the wrong path. We explore these ineffective strategies first.

Perpetually Updating Schedules—Easier Now, Harder Later

One approach that has emerged over the past five years is to utilize a web-based technology that permits schedules to be managed and automatically updated online as laws and regulations change. These cloud-based schedules operate under the idea of identifying all regulatory changes as they occur, and then dynamically updating the retention period in a company's schedule. At first this seems like a great idea. Unfortunately, while this approach simplifies a small part of the records program, it results in larger compliance gaps.

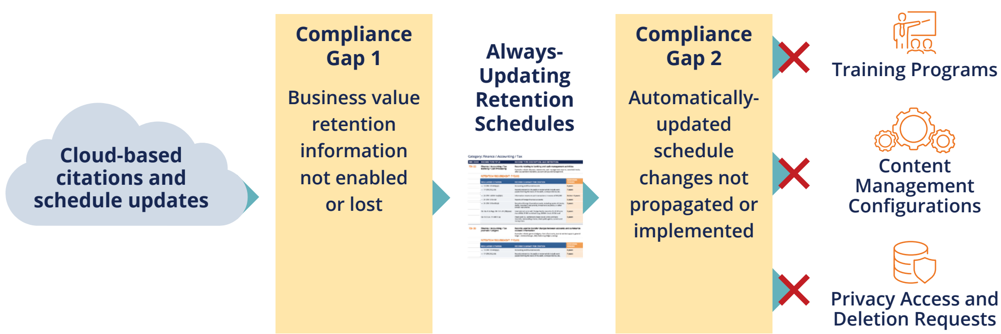

Figure 2. Perpetually updating records retention schedules create compliance gaps.

Source: Contoural

The main problem is that these perpetually updating schedules are not synchronized with program execution. If a schedule gets updated every week, a company in turn would also need to update their records processes, configurations and training with the same frequency An online schedule can potentially change on any given day, and no company can be prepared to update their execution process as quickly. As a result, there exists a compliance gap between policy and implementation. It also assumes that the schedule is based exclusively on legal and regulatory requirements, which should not be the case, as is explained further in the next section.

Complex and Detailed Taxonomies Frustrate Employees

A common lament among records managers and their IT counterparts is that they have configured information repositories (such as Microsoft's SharePoint product) but cannot get employees to store their records and other information in these systems. The problem may not be the employees, but rather the complexity with which these sites have been designed.

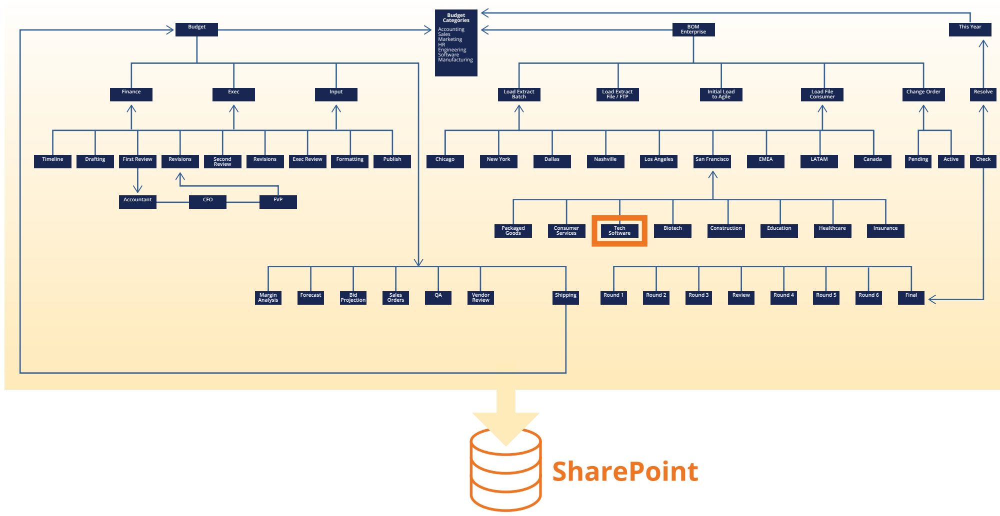

Figure 3. If employees need to navigate overly complex taxonomies and file plans to store their documents, they will find it difficult and simply store their information someplace easier. In the example above, employees must navigate several directories and levels to store their documents in the correct folder. Source: Contoural

Recognizingthat not only do different retention periods apply to different documents, but that privacy, data security and other governance requirements may apply, a common mistake is to get "taxonomy happy"—creating detailed and complex taxonomies or directory structures. While these may seem appropriate and reasonable to a records manager or enterprise content professional, most employees loathe them as being too complicated and cumbersome. The navigation process illustrated in the diagram above greatly exceeds the "five second rule" that is so crucial to effective employee compliance. Furthermore, when employees fear that they will not be able to find a document later, even if filed correctly, they will save a copy of that document someplace else as a backup measure, thereby negating the intended benefits of centralized storage.

Aggressive Deletion Drives Underground Archiving

The "save everything forever" mentality of employees can sometimes lead frustrated Legal and senior management staff to enact extreme measures. One common approach is the "aggressive deletion" strategy enabled by Legal and IT management; it can employ automated deletion programs across email inboxes and deletes emails older than, for example, 60 or 90 days. Sometimes the strategy is applied against file shares, in an attempt to quickly delete ROT. Although well intentioned, this strategy can quickly backfire.

When companies start an aggressive deletion process, employees often react with a counter behavior of "underground archiving." In a bid to save their emails and files from deletion, employees save them on desktops, laptops, centralized file servers, USB drives, and other unauthorized areas. Companies respond by shutting down the ability to use USB drives, which is generally a good practice. In the ensuing information retention and disposition arms race, employees start forwarding emails, files, and other information they believe they need to their personal email account; some employees have been known to create Google Gmail accounts solely for this purpose. Companies then try to tighten down on outbound emails, but employees find another way and the arms race continues.

The diaspora of email and files outside the company makes the problem worse. Much worse.

Senior legal and IT management's intentions are correct in applying this theory. Employees do save too much ROT and other unneeded content. But employees are not wrong—some information legitimately must be retained due to its business value. As a result, the strategy of aggressively deleting information not only doesn't work, but the diaspora of email and files outside the company makes the problem worse. Much worse.

Employee Self-Certification of Records Compliance Does Not Work

Another approach is to put the records management compliance burden entirely on employees. Some companies adopt an employee records compliance self-certification process: an automated system sends out a link every month to employees, requiring them to click the link to confirm their compliance with the program. Those who fail or do not clink the link to acknowledge their compliance with the program face disciplinary action.

Putting the compliance onus on employees has an apparent simplicity and ease. However, past assessments of records program compliance demonstrate that this type of self-certification does not actually work. Employees tend to follow the process initially, but soon fall behind on declaring and retaining their records. They still click the link claiming compliance, thinking to themselves they will catch up classifying all their records and complying with the policy. They fall farther and farther behind. Over time, despite their self-certification that they are following the records program, they eventually fall out of compliance. This gap can become a major issue during a regulatory inquiry or litigation.

Leveraging the Capabilities of Microsoft 365

Do I Really Need to Buy New Technology to Automate?

Microsoft 365 has many native Information Governance capabilities:

- Managing schedules and automatically publishing updates
- Publishing department and function-specific views of a schedule
- Enabling online retention schedule searching
- Drag-and-drop document inheritance for retention, data security, access control
- Enabling fully compliant automatic disposition
- Automatically propigating and enforcing changes to retention schedule changes

Many automation strategies depend on implementing some type of software or hardware tool. Does this mean that companies wanting to automate their records programs need to buy new technology to do so? Most often, the answer is no. Many companies today already own products that can be used to automate their records programs. A good example of this is Microsoft's Microsoft 365 suite of productivity tools. Many companies have deployed Microsoft 365 (often referred to as M365) to move email and file management into the cloud and reduce costs. Company may have also deployed a document management or enterprise content management systems in the past. However, most companies do not configure them to take advantage of these Information Governance automation capabilities.

In Part 2, we'll discuss automating your records retention program using Microsoft 365.

About Contoural

Contoural is the largest independent provider of strategic Information Governance consulting services. We work with more than 30 percent of the Fortune 500 and numerous mid-sized and small companies and provide services across the globe. We are subject matter experts in Information Governance, including traditional records and information management, litigation preparedness/regulatory inquiry, information privacy and the control of sensitive information, combining the understanding of business, legal and compliance objectives, along with operational and infrastructure thresholds, to develop and execute programs that are appropriately sized, practical and "real-world."

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