TAMING THE BEAST

A 15-MINUTE GUIDE TO RECORDS MANAGEMENT
PREFACE

As an enterprise professional with strategic responsibilities, time is your most precious commodity. When you want information, you want it fast and you want it concise. With that in mind, we’ve developed a series of 15-Minute Guides to essential topics in information governance.

This guide focuses on the compliant management of formal company records, a vital component of your overall content strategy. It is written as a companion to our 15-Minute Guide to Retention Management, which deals with preserving day-to-day, or “typical” content.

The discussion includes:

• The increasing challenge of complying with government regulations and legal discovery
• Distinguishing formal records management from simple/typical records retention
• Automating and federating the management of electronic records
• How to prevent an excessive focus on recordkeeping from stalling your business
• Extending records management to employ “file intelligence” for efficient business processes

Along the way, we’ll see how EMC® Documentum® Records Manager offers a unique and innovative solution that builds on the underlying strengths of the Documentum platform.
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THE GROWING CHALLENGE

If “recordkeeping” was ever a sleepy topic, it is no more.

Never has the proper handling of vital company records been more crucial—or more difficult for your business. Rules about the retention and control of key records have proliferated almost as fast as the documents themselves: globally and across all industries. Threats of legal discovery, broad audits, and information theft have become a real and present danger to every organization. Each year, the penalties seem to increase for noncompliance, mishandling of evidence, or inadequate responses to information requests arising from audits, eDiscovery, the U.S. Freedom of Information Act, the Canadian Access to Information Act, and similar governmental mandates around the world.

In sectors like pharmaceuticals, finance, and energy, additional regulations apply; but every organization is regulated to some degree. Every organization has HR, contracts, and tax documents subject to audit and discovery. Everything from Active Agreements to Zipped 1099s, whether held as bits or as paper, must be preserved in unaltered form; then found quickly, no matter where created or how greatly dispersed. Of many documents, you must be able to say, “This is the official record version; this is the date it was locked down; this is who had access.”

Speed of retrieval is crucial—both to timely corporate decision-making and to legal compliance. In addition, if you are to protect the business, many records must be destroyed—at the proper moment, and following the proper rules.

LEARNING TO TAME THE BEAST

All that said, any experienced executive knows that an excessive focus on recordkeeping can be as dangerous to efficiency as it was a hundred years before the word “metadata” was coined. “Declaring” official records, tagging files, and filling out endless metadata screens must not be allowed to consume the daily work of your most productive employees, limit their inspiration, or slow your success.

You have to find a balance—and a technical approach—that meets all your compliance requirements without significantly impacting your business. You must maintain control—not just over your records—but your organization’s recordkeeping efforts.

You must learn not just how to “own the beast,” but “tame the beast.”

A PERVASIVE, BUT LARGELY INVISIBLE SOLUTION

It is easy to approach the problem of enterprise records management in the wrong way. Because employees are at times overwhelmed by the vastness of their information repositories, they often try to implement records management by creating discrete “silos” in which they manually place different kinds of official records. This makes for inefficient and time-consuming processes, far too subject to human error. Records become lost or destroyed as personnel change, branches close, repositories are moved, systems are retired, or policies are ignored. Audit trails become broken, and because each silo is under differing control, records are easily “spoliated,” or rendered unreliable, in legal parlance.

The right strategy for any size organization is to create a broad set of records policies which are enforced globally and company-wide through a single, efficient, and substantially automated system which enables and enforces those policies. Such a system can bring the wide variety of electronic data sources and repositories (on-premise or in the cloud), along with physical records (paper, microfiche, etc.) under one set of centralized rules that applies to specific records no matter where those records actually reside.

If it is to operate properly, and without bringing your organization to a standstill, that system must be pervasive, but at the same time largely invisible to most users.

“FORMAL” VERSUS “TYPICAL” RECORDS

In Records Management, we often distinguish between “Typical” and “Formal” records.

Typical records include the wide range of document types that can be declared as records through automated processes with little to no user involvement.

Formal records are those that must adhere to more stringent compliance standards, including governmental certification requirements like DoD 5015.2 in the U.S., MoReq2010 in Europe, or VERS in Australia.
Let’s break down records management into seven basic tasks:

- Capturing and retaining records (electronic and physical) in unaltered form
- Safeguarding records and providing appropriate access
- Complying with regulations related to specific kinds of records
- Finding and producing records in a timely manner
- Managing the overall growth of records, minimizing duplication, and enforcing version control
- Managing metadata changes to records as necessary and appropriate
- Disposing of records in an appropriate and timely manner

That last point must not be neglected. Many is the organization that knows how to keep its information, and even knows which of it is accurate and current—but does not know how to defensibly dispose of information once it becomes obsolete. The results are often unfortunate. A rational and “defensible disposition” process deletes what you can delete, and keeps what you must keep, in accordance with your internally or externally mandated policies.

DIVIDING THE BEAST: “RPS” VERSUS “RM”

At EMC, our experts divide the larger problem of information governance in two significant ways. These divisions help us balance compliance against efficiency: realistically protecting the organization without bringing it to a standstill.

The first division is between Retention Policy Services (RPS) and formal records management (RM). RPS refers to the automatic retention and control of potentially transient business information like emails, IM chatter, video, images, presentations, project information, and other data now subject to legal discovery. RM refers to records that are actively managed against some sort of regulation or measure of compliance, whether mandated externally or internally.

EMC solutions uniquely handle both kinds of information through a tightly linked suite of services constructed on the EMC Documentum platform. In our approach, Documentum Records Management is built on top of RPS, so that nothing is lost, including context—but more rigorous policies are applied where needed, and systems are federated where appropriate. Records Management deals with process plans, classification terms, access to information, and the segregation of record types or content—all while providing layered security throughout the records life cycle.

In this guide, we focus on this more formal process of records management, or RM. To better understand our approach to RPS, we suggest you read our companion piece, the “15 Minute Guide to Retention Management.”

DIVIDING THE BEAST: REGULATED VERSUS HIGHLY REGULATED

The second division of governance is more subtle, but equally significant. Often we are asked if Documentum Records Manager is certified against standards like DOD 5015.2, which specifies the handling of even top secret files for DoD, Intel Agencies, and defense contractors. The answer is yes—but unlike other solutions, we provide for modular deployment, so that such rigorous and time-consuming standards, which include, for example, the filling out of extensive metadata forms for each document, are applied only in the departments and to the kinds of documents for which they are required—not slowing down the rest of the organization.

This is crucial because many companies fail to deploy meaningful records management when they rightly perceive that standards like DOD 5015.2 are unnecessary for every part of the business.

“SPOLIATION” LOSES THE CASE

A corporate vice president at a major manufacturing concern has the habit of saving new versions of important discussion documents, employment offers, and even alliance agreements right over previous versions. When a deal goes bad, and a former alliance partner sues, it’s impossible to reconstruct events or determine the chain of ownership on key records. In court, the opposing side argues that evidence has been subject to “spoliation,” and rendered meaningless. The manufacturer loses the case, and is even fined by the court.

A proper records management solution would have worked automatically in the background to maintain audit trails on the VP’s sloppy work habits, and would have imposed strict version control on records, even if they were simply dropped into folders on the VP’s desktop. He would never have been allowed, for example, to “save as same version.”

In this guide, we focus on this more formal process of records management, or RM. To better understand our approach to RPS, we suggest you read our companion piece, the “15 Minute Guide to Retention Management.”
Whatever standards are required, Documentum Records Manager greatly simplifies compliance with yet another unique innovation: our content management system builds most of the metadata into policies which attach to everything that enters certain folders... without the user even being aware of it. Save a document to the right folder, and those policies and metadata are automatically applied and enforced on the records themselves, making it a compliant records solution without any wasted effort on the part of your employees.

**CREATING AND IMPLEMENTING A FILE PLAN**

At the heart of Documentum Records Manager is a customized File Plan. The File Plan details the security, permissions, classification, retention, and disposition protocols for all the different types of records inside the organization. Once records are categorized and classified by type, the File Plan becomes the basis for automated policies and specifies a rich set of user and role-based access—again, without the average user even being aware of the governance process.

However, the File Plan goes well beyond controlling access. It anticipates audit, litigation, and regulatory “holds” placed on records; it specifies the automatic audit trails which will be applied to the differently classified documents; it enforces naming policies—while triggering a host of other vital functions which create comprehensive governance.

Because it operates within a broad, and potentially federated architecture, the File Plan can be used to organize recordkeeping requirements across the entire geographically dispersed enterprise, with corporate and departmental classification taxonomies applied to both electronic and physical records.

Here is a quick breakdown of the way Documentum Records Manager implements the File Plan, as it works with Retention Policy Services atop the Documentum Platform. The EMC Documentum Records Manager does the following:

- Creates and enforces Record Containment Policies
- Creates and enforces security, naming policies, and record relationships
- Implements restrictive and shared markings on records
- Provides for formal records declaration
- Implements web services for records
- Handles reporting and auditing

THE RECORDS LIFE CYCLE

Whether discussing “formal” or “typical” records, it’s important to understand, at least at a high level, the functional process involved in the Records Life Cycle.

1. Content is created and often changed or altered as it moves through business processes or through collaborative cycles.
2. Once the access and other policies for a record have been set, they must be locked into the record and will be executed until the record has run through its predetermined lifecycle.
3. Once content is “declared a record,” either manually or automatically, it ensures that the processes and policies you have in place are properly aligned to your records requirements.
4. Throughout its lifecycle, the records must be easily searched for and retrieved according to controlled rules of access.
5. Notifications can be sent when certain records are accessed or moved.
6. Records must be rapidly found and retrieved for legal discovery or audits.
7. Multi-aging support means that both chronological and conditional aging are supported, allowing records to interact with business processes and procedures.
8. Finally, once the record has lived out its life, it can be digitally or physically shredded, either automatically (by rule) or after human approval. In RM, we call this process “disposition.”
• Provides notification to the right parties when records are changed or moved
• Creates retention markups (holds) in conjunction with RPS
• Handles storage management in conjunction with RPS
• Processes records disposal ("disposition") through a single disposition manager, regardless of type (informal, formal, or physical)

TAMING THE WHOLE BEAST

We’ve mentioned managing physical and electronic documents together—but how is that actually accomplished? How can the “whole beast” be tamed by one system?

To handle electronic documents, Documentum Records Manager applies metadata tags, policies, and audit events as appropriate to each electronic record type—and it handles physical records in much the same way.

To control paper records, EMC uses a unique module called Physical Records Services (PRS) to create virtual warehouse locations with bays, bins, and shelves. These correspond to actual storage locations, no matter how far-flung. To link the virtual with the physical, the system generates bar codes that personnel can attach to the actual folders, boxes, bins, or individual records as they move through the real world.

Using PRS, the same markups, policies, reporting, and even disposition processes can be applied to any mix of physical and electronic records. When a user wishes to borrow a physical asset, library requests are routed automatically to the physical records administrators for processing, and the audit trail is maintained.

Another important solution, EMC Captiva®, captures physical documents in bulk, keeps them in context, and transforms them into electronic records. If the physical original is retained, both copies can be managed independently. Once implemented, Captiva ensures enormous savings over the high cost of filing, finding, or re-creating paper documents.

Over time, as more and more records of all types are brought under unified controls and workflows, indexes become increasingly comprehensive, searches become more accurate, and the retrieval of mixed electronic and physical documents becomes ever more rapid and precise.

MOVING TO “FILE INTELLIGENCE”

Of course, it’s one thing to better manage the records already under your control, but what about those you don’t even know exist? What about formal and typical records now “in the wild” on laptops or desktops, dropped in Microsoft SharePoint, attached to emails, or otherwise scattered? At some point, you have to ask, “What records are really out there? Where do they live? Are they duplicated in multiple versions? How do I identify the important records and bring them in from the cold?”

And of course, “What kind of risk are we really carrying?”

Once basic Records Management is in place, you can begin to layer in efficiency, control, and content processes that drive your business forward.

At EMC, we offer a linked product called Kazeon® File Intelligence which goes beyond Documentum to proactively scan all your organization’s servers, personal computers, IM and email, along with private and public cloud stores. The goal: create actionable intelligence about disaggregated data of all kinds. Once found, cataloged, and analyzed, Kazeon File Intelligence can then appropriately move or copy content to Documentum RPS or RM systems and create records in the process. It can also move content to archive-ready storage platforms such as EMC Celerra®, Data Domain®, or Centera®— all according to your File Plan, and ready for business use, audits, or eDiscovery.

FIGHTING MALICIOUS LEAKS

November 2010: a 22-year-old soldier is charged with stealing more than 250,000 secret U.S. embassy cables by copying them from a military network to a CD-RW disc. The cables detail corruption in foreign governments, arms-dealing, and other highly-sensitive issues—and were allegedly delivered to the website WikiLeaks. According to published reports, the theft was ridiculously easy: the accused would come in to work with a commercial music CD, wipe its files, access the network, and download what would eventually be about 1.6 gigabytes of secret documents.

How could this have been prevented? A proper records management solution would have first denied the soldier access, and if he had gotten past the initial challenges, he would have encountered encrypted files. At the same time, the proper authorities would have automatically been informed that the files had been accessed— with or without apparent authorization. If the soldier had somehow obtained the encryption keys and also somehow responded convincingly to the alerts, then a records management solution equipped with an Information Rights Server could have automatically rendered the files unreadable, even by the soldier, the moment it left his workstation. End result: no headlines.
Because Kazeon File Intelligence can operate without any involvement, or even the knowledge of users, your staff are not slowed by the problem of controlling data/records—even as they are enabled to fully utilize the data/records they generate on a daily basis. In short, your organization can begin to exercise a genuinely pervasive and pro-active “file intelligence.”

HIGHER LEVELS OF EFFICIENCY, CONTROL, AND SECURITY

Once basic records management is in place, you can begin to layer in further efficiency, control, and content processes that drive your business forward.

Case Management with xCP—One of the most important of these efficiencies can be brought with “case management” automation using Documentum xCP—a tool which allows you to rapidly compose applications that accelerate information-driven business processes. Integrating xCP with Records Management can create “one-click” systems for everything from on-boarding employees to opening and closing financial accounts. The results can be dramatic and transformative.

Trusted Content Services—TCS offers an additional layer of data security for industries where security is paramount—including the automated encryption of underlying file stores, support for key government standards, state-of-the-art electronic shredding, and secured connections within the Documentum platform itself.

Content Intelligence Services—IS automatically classifies and categorizes extremely large volumes of information quickly—as the data already exists in the repository or as it arrives from authoring applications, record filing, or business processes. With CIS, content is parsed and analyzed; classification rules are applied; hierarchies, taxonomies, and keywords automatically populate content metadata within Documentum.

At some point, you have to ask, “What records are really out there? Where do they live? Are they duplicated in multiple versions? How do I identify the important records and bring them in from the cold?”

Information Rights Management—IRM offers roaming file security by placing encryption on documents that forces them to communicate with an IRM server each time someone wants to read or modify them. By using this “long distance lock,” you can be assured that governance will be applied regardless of the document’s location in the cloud, on users’ personal systems, or behind the firewall—greatly reducing the chance of unauthorized access. You can also render each and every copy of a document permanently unusable once the “official record” is deleted by the Records Manager, because the encryption key on the server is deleted at the same time. Used correctly, IRM offers unparalleled peace-of-mind in an increasingly boundary-less information landscape.
PUTTING IT ALL TOGETHER

EMC Documentum Records Manager meets the unparalleled modern challenge of formal recordkeeping with a tightly-integrated set of tools built atop the Documentum and Retention Policy Services platforms. These tools enable you to deploy only as much recordkeeping process and stringency as you require for each type of record—regardless of records volume. Additional layers of efficiency, security, and process automation can be added to increase the real business value of RM.

Records Manager is the most complete out-of-the-box solution on the market, delivering a trustworthy, defensible, and secure solution for your most vital organizational records.

We invite you to read the more detailed data sheets available for each of these products, and begin creating a plan for your organization to “tame the beast.”

ABOUT EMC

EMC Corporation is the world’s leading developer and provider of information infrastructure technology and solutions that enable organizations of all sizes to transform the way they compete and create value from their information.