



INFORMATION GOVERNANCE AS A MANAGEMENT STRATEGY TASK FORCE REPORT



LAW FIRM INFORMATION GOVERNANCE SYMPOSIUM JULY 2015

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Since 2012, the Law Firm Information Governance Symposium has served as a platform for the legal industry to collaborate on information governance (IG) best practices in the unique setting of law firms. The Symposium publications offer definitions, processes and best practices for law firm IG. In 2014, four task forces were assembled by the Symposium Steering Committee to work on specific, current law firm IG topics. This Information Governance as a Management Strategy Task Force report explores the role of an IG organization within a law firm and how that group can help the firm achieve established business goals. Additionally, the report discusses possible ways that the group might be organized and how it can most effectively drive change within the firm.



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This report was created for law firm executive leaders, who are navigating an increasingly complex environment where the need to drive efficiency and manage cost conflicts with amplified risk management and compliance requirements, many of which relate to client and firm information. The report sets forth the business case for information governance (IG) as one strategy law firm leaders can use to achieve their business goals. It also describes the level of focused leadership necessary to implement IG, and recommends bringing together a variety of law firm stakeholders within an information governance organization (IGO) to act as the change agent to drive IG within the firm. Because law firms vary in size, geography, practice group composition and information management maturity, this report provides considerations for scaling the IGO to meet the firm's current needs and future IG growth. An IGO, thoughtfully designed to meet the firm's specific needs, can implement the changes needed to leverage IG as a transformative agent for success in a challenging business climate.

The report discusses:

- » **The business drivers for IG**
- » **The law firm IGO, including goals, scope and composition**
- » **The evolution of the IGO over time**

BUSINESS DRIVERS FOR IG

In today's legal marketplace, clients rather than law firms define the value of legal services. Competition among firms for available work has become constant and aggressive.¹ This new reality requires proactive law firm leaders to constantly seek innovative ways to control cost and improve efficiency. They aspire to firms with fewer support staff, lower operating costs and more productive lawyers. Thus a key goal of many managing partners and C-level leaders is to streamline the ways lawyers and staff work by reengineering processes related to the delivery of legal services and the firm's business activities.

This drive toward heightened efficiency is happening against a backdrop of increased cost and risk related to the information law firms create, receive, transmit, store and use to provide legal services and manage the firm. The first report issued by this Symposium described the following pressures: high volumes of electronic information, ever-increasing storage costs, increased regulatory requirements, heightened information security demands from clients, control risks surrounding the mobility of legal matters and the portability of information and emerging trends related to third-party access to firm information.²

IG has emerged within the broader business world and the legal industry as a way to address the multitude of pressures related to information management. IG seeks to treat an organization's information as a critical business asset, requiring top-down management to effectively address the organization's legal obligations, operational requirements and risks. Additionally, IG can have positive impact on the organization's larger business concerns, acting as a catalyst for cost savings and enhanced productivity and for the innovative change that can lead to competitive distinctiveness. IG can result in reduced cost related to storage, more efficient access to information, better engineered processes requiring less support and more effective compliance with legal requirements.

The new legal marketplace requires firm leaders to strategically select change management initiatives in which to invest. IG is a complex undertaking, requiring a commitment by the firm not only to fund specific IG initiatives, but also to support the cultural and behavioral changes necessary to create an “IG state of mind” in the firm in which all personnel treat information as a critical resource. Despite these challenges, the rewards can be significant. The value propositions for IG include better client service, competitive distinctiveness, enhanced lawyer and staff productivity, more effective cost management and stronger compliance and risk management.

CLIENT SERVICE

Among its core objectives, IG seeks to improve the availability and security of information. Law firms that implement IG can improve client service by making it easier for busy lawyers to find needed information, and by assuring clients that their sensitive, confidential, proprietary or highly regulated information is safe within the firms’ systems.

The practice of law depends on reliable access to information, which in today’s legal environment is almost entirely electronic, existing in vast quantities within various structured and unstructured repositories. The volume of electronic information and its dispersion across multiple systems and devices compromises the lawyers’ ability to access what they need completely and promptly, slowing down or delaying the provision of legal services. Lawyers who can easily access and leverage information can meet the demands of clients who expect outside counsel to be immediately and constantly responsive to their concerns.

Additionally, clients are increasingly concerned about the law firm’s ability to protect their information. Law firm information security is generally perceived as weaker than that of organizations in highly regulated industries, such as finance or healthcare.³ Thus clients are pressing firms to assume information security obligations that support their own legal requirements.⁴ These obligations come to the law firm in the form of agreements, such as requests for proposal, outside counsel guidelines, engagement agreements and information security questionnaires. IG provides the framework that allows the firm to evaluate these requests, identify security gaps and develop a roadmap for improved information security to address client needs.

COMPETITIVE DISTINCTIVENESS

Clients rate their outside law firms on responsiveness and overall service, and firms that exceed expectations in this regard are more competitive in a tight market. Beyond this, if a firm proactively addresses a prospective client’s concerns about information access and security by explaining the scope and breadth of its established program to govern information, the firm can distinguish itself as forward-thinking, technologically astute, service-focused and in tune with the client’s need to engage law firms that provide cost-effective services and understand their business requirements. Thus IG can be leveraged as a business development advantage.

ENHANCED PRODUCTIVITY

While law firms continue to structure fees on the basis of time expended on legal matters, clients increasingly insist on alternative fee arrangements based on factors other than hours worked. Thus law firm leaders actively seek greater efficiency in the processes that support the delivery of legal services. IG goals to streamline information management processes and consistently aggregate, organize and store information, improve the ability of busy lawyers and staff to find, use and leverage information in ways that get the job done quickly and effectively. They can serve more clients, sell more work and better support firm business objectives.



COST MANAGEMENT

An IG emphasis on consistency and efficiency enables the law firm leader to manage costs in two significant areas.

Staffing

The changing legal marketplace has focused law firm leaders on staffing ratios, i.e., the number of staff per attorney. Most law firms are actively trying to reduce staffing levels.⁵ Process reengineering related to IG results in streamlined processes which can drive strategic reductions in force. Examples include deliberate strategies to limit paper recordkeeping, thus reducing the footprint of office-based records management teams, implementing various cloud-based applications which can reduce staff needed to administer on-premise solutions, or outsourcing certain functions such as records management, the technology help desk or information security operations.

Operational Costs

In addition to staff ratios, process reengineering driven by IG can effect a number of additional cost savings:

- » **Reducing costs for physical and electronic information storage.**
- » **Limiting costs related to regulatory compliance, including discovery costs, civil damages, and court penalties, data breach notification costs,⁶ and fines or penalties resulting from the breach of confidential client information or information covered by federal or state law.**
- » **Reducing insurance premiums through tightened compliance processes.⁷**
- » **Limiting the loss of fees and/or client relationships resulting from data loss events.**
- » **Recapturing real estate costs as firms release or repurpose space previously used to store hard copy documents.**

RISK MANAGEMENT

There are a variety of risks related to managing information in the law firm. Most of these surround inadvertent or deliberate data leakage or theft. Through an emphasis on compliance, security and information management behaviors, IG delivers policy, process, systems, and cultural changes to mitigate the risk that confidential client information, as defined by the rules of professional responsibility, or information covered by federal or state regulation, will be breached. Such data loss events can result in serious exposure for the firm, including lawsuits, court or agency imposed fines and penalties, and reputational damage.⁸

THE LAW FIRM INFORMATION GOVERNANCE ORGANIZATION

Although IG is a powerful tool for the law firm executive trying to lead his or her firm through a complex maze of market pressures and information management risks and requirements, it also requires a significant amount of change. Implementing an IG program involves developing a framework of policy, process, systems and awareness to drive behavior and cultural change.⁹ It requires investment on the part of the law firm in technology and talent, and a willingness to transform specific operations into more nimble, effective and leaner organizations. It also requires a consistency of approach, oversight and execution. Although firms generally employ specific individuals who have some of the knowledge and skills needed for IG, they have not developed or marshalled these resources as the concentrated force necessary to drive IG implementation.

As with any significant change management effort, IG requires the engagement of multiple stakeholders, supported by management who together provide the talent, knowledge, skill set and unity of purpose necessary to achieve the firm's goals. This report refers to this group as an information governance organization, or IGO. Often, the first iteration of a firm's IGO consists of one individual, typically an information management professional from the technology or records management department, who works to persuade leaders in the firm that creating an IG culture is critical to the firm's management of information assets. As firm management becomes increasingly "IG aware," it can tie IG to the firm's larger strategic goals, and begin tasking other stakeholders to participate in the IGO. Thus the size and composition of the IGO reflects the development of management's strategic understanding of IG. Figure 1 illustrates this relationship.

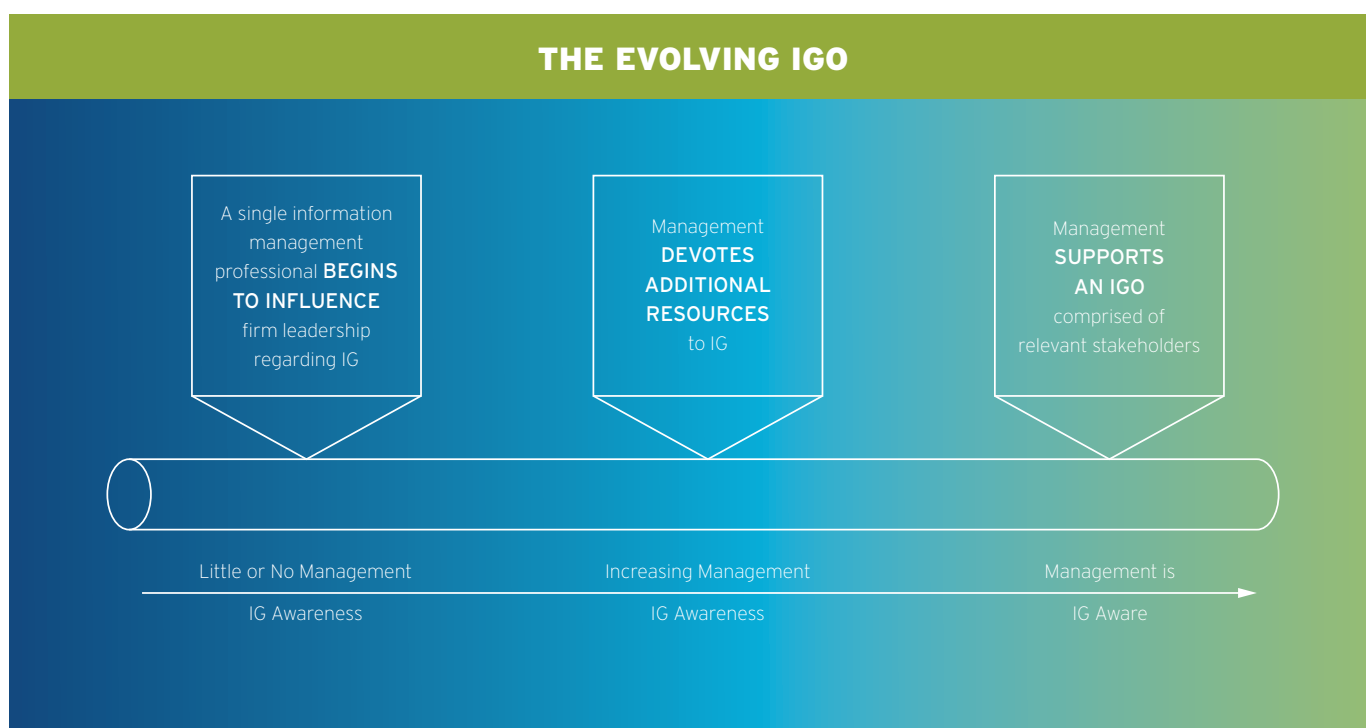


FIGURE 1

To enable law firms of all sizes to visualize the complete function and scope of the IGO, this report portrays a robust IGO populated by a significant number of stakeholders, but also recognizes the need for scalability. Below is a discussion of the critical requirements for an effective IGO, including the firm's definition of its IG goals, the IGO's scope of responsibility and structure of the IGO.

FIRM GOALS FOR IG

Identifying firmwide goals for IG first involves an assessment of the firm's current information management state, as well as its capabilities. There are a variety of ways to assess the law firm's information management maturity. This task force recommends the Maturity Model put forth by ARMA International, which cites five levels of IG maturity, modified below to fit the law firm environment.¹⁰ For the purposes of this report, this model is referred to as the "IG Maturity Scale."



- » **Substandard (Level 1):** Information management, including recordkeeping, is not addressed at all or is at a minimum level. The firm should be concerned about security, data loss and ethical or legal compliance.
- » **In Development (Level 2):** There is a growing recognition that IG will benefit the firm, but efforts are ad hoc and the firm is still vulnerable to data breach and non-compliance.
- » **Essential (Level 3):** Minimum policies, processes and systems are in place to manage information and ensure compliance. Nevertheless, significant opportunities exist to streamline processes, control cost and improve access.
- » **Proactive (Level 4):** IG considerations are actively and routinely being integrated into the firm's information management processes and culture. Firms at the proactive state may be ready to take steps to transform all stakeholders to an IG culture.
- » **Transformative (Level 5):** IG has become so embedded into firm process and culture that compliance is routine behavior for all firm personnel. Firms at the transformative state have achieved their business and IG goals.

In addition to information governance maturity, there are a number of additional factors the firm should consider when defining its IG goals.

Cultural Challenges

IG seeks to create a culture in which all firm personnel understand their responsibilities to manage information in their possession. Law firm leaders creating an IGO should consider the unique culture of their firm, and how much authority the IGO has to drive this level of change. In general, it takes a "tone from the top" to create organizational change. As will be seen below, this report suggests that the IGO include executive sponsors who ensure that the firm's IG program reflects the goals of senior management.

Small Firm Vs. Large Firm

The size of the firm, its existing organizational structure and its ability to provide resources will impact its overall information management strategy. Smaller firms may be able to achieve change in a more nimble fashion, even if they do not have the financial ability to invest in high compensation for IG leaders or in sophisticated systems. On the other hand, the information management needs of larger firms may be more complex, requiring greater investments in people, systems and processes.

Geographic Considerations

The geographic spread of the firm has definite implications for IG and will affect the composition and scope of the IGO. A firm that operates only in the United States will have very different compliance obligations than if it has offices in other countries. In addition, the IGO must be aware of cultural differences in international offices that will affect IG implementation. Firms that operate internationally are advised to involve stakeholders from a variety of countries in the efforts of the IGO.

Practice Group Considerations

The practice composition of the firm will affect the IGO's focus on specific information activities. The IGO may need to apply IG requirements to a variety of functional areas including litigation support, or litigation or intellectual property docketing systems. Firms with transactional practices might use collaborative electronic "deal rooms" to



store critical data. Estate planning and tax attorneys routinely transmit personal information such as social security or bank account numbers to their clients. Health care attorneys and others might routinely receive protected health information (PHI) covered by HIPAA in their matters. The IGO should be tasked with an evaluation of all practice areas to determine unique IG considerations.

Once the firm explores these issues and benchmarks its place on the IG Maturity Scale, it can then develop its overarching goals and objectives, which will in turn drive the IGO's scope of work and structure. For example, if the firm is at Level 1 or 2 on the IG Maturity Scale, its long-term goals might be to achieve Level 3 or 4 (and potentially Level 5), but its first concerns will be to establish fundamental recordkeeping and information management policies and processes.

IGO SCOPE OF RESPONSIBILITIES

The IGO's scope of responsibility will depend on the firm's short and long term information management goals. In general, the IGO develops an IG strategy and supporting policies, directs efforts to reengineer processes, drives change through IG training and awareness and brands the IG program to become a recognizable part of the firm's culture.

Strategy

The most fundamental value the IGO can provide is a strategic plan for IG. The plan will also set forth tactical initiatives needed to implement each strategy, the costs involved and the roadmap for implementation so that the firm's investment is appropriately leveraged and staged. Here are some examples of strategies that might be included in such a plan. With each one, the IGO must define the specific tactical steps to take to achieve the goals of the strategy.

Information Security: This includes policies, processes, systems and tools to keep confidential and private information secure from both internal and external threat. An information security strategy will include initiatives for data loss protection, the management of personal and mobile devices, the appropriate release and acquisition of transferring client information and the identification and mitigation of system vulnerabilities, such as viruses and violations of security policies.

In addition, the security strategy will define the firm's philosophy of information access, such as whether firm systems are "optimistic" (i.e., systems are open to all personnel unless specific security is applied), or "pessimistic" (i.e., systems are restricted to only those with a need to know). The firm's security philosophy will determine the appropriate use of personal and mobile devices, requirements to encrypt data at rest and in motion and the individual's responsibilities to secure specific, sensitive documents. Finally, it is the information security strategy that will enable the firm to proactively manage client demands regarding the management of their information (see below for compliance and client/third-party access strategies).

Storage: Records management processes are an essential element of IG. An information storage strategy defines the types of information that can be discarded at the individual's discretion (i.e., non-record or convenience record material), and information that must be stored on a long-term basis as official records. In addition, the strategy identifies specific and approved repositories where official records may be stored,¹¹ and it sets forth policies and procedures to manage official records through their lifecycle, defining when they become inactive, and when (and how) they can be eliminated. The storage strategy applies to information in all formats, including print and electronic.



Electronic Records: IG assumes that the firm's official records are kept in electronic form. An electronic records strategy includes initiatives to define the electronic file, including where the file is (and is not) stored, how it is organized and what types of records should be filed in it. It also includes projects related to email management and enterprise-wide imaging to digitize official hard copy records. It also defines the treatment of hard copy records that have corresponding electronic versions.

Compliance: In addition to ensuring that the confidentiality of client information is addressed through policy, process and system, the IGO should assess which federal and state privacy and security regulations apply to the firm, and what tactics must be in place to support compliance. The security strategy described above will provide significant leverage for the IGO's effort to comply with ethical and legal requirements.

Client and Third-Party Access: As noted throughout this report, clients are increasingly imposing information management requirements on outside law firms. The IGO should oversee efforts to define processes for evaluating and responding to such requests. Similar to the compliance strategy, the IGO will be able to leverage the security strategy to address many client demands.

Additionally, firms frequently engage third-party vendors to provide certain services that require access to firm systems. Examples include contract attorneys, litigation support providers, outsourced document processors or records management staff. The IGO should develop processes to evaluate each proposed vendor's information security approach, and also draft standard contract language that defines the firm's requirements for confidentiality, security, liability, indemnification and insurance. Finally, the IGO should ensure that the technology department has the ability to grant third-party providers access to only those systems necessary to do their work.

Measurement and Continuous Improvement: The IG program will evolve based on changes to technology and the legal industry, as well as societal issues related to privacy and security. The IGO should develop mechanisms to audit compliance with IG policies and measurements to determine if IG is achieving the firm's business goals. The IGO should constantly assess the IG program to ensure that it remains vital and relevant and continues to support firm objectives.

Policy

The IGO also sets forth policies that are critical to a successful IG program. Below is a listing of policies that law firm IGOs might consider including as part of their IG framework:

» Confidentiality and Privacy

» Acceptable Use of Firm Systems and Technology

» Information Security

» Access, Use and Disclosure of Personal Information (e.g., Personally Identifiable Information and Protected Health Information)

» Notification of Breach of Confidential or Personal Information

» Records Management Policies:

- Electronic Records Management
- Retention and Disposition of Client and Firm Records (including schedules)
- Acquisition and Release of Client Information
- Legal Hold Policies

» Client and Third-Party Access Policies

Process Reengineering

Business process reengineering is a distinct discipline, which requires focus, consistency, resources and commitment on the part of management. Since a core focus of IG is process efficiency, the IGO will be concerned with reengineering a variety of information-related processes. The list below is not exhaustive, but provides examples of processes the IGO should consider:

» Technology Processes

- **Systems selection:** to identify redundancies and ensure that new systems are selected with IG standards in mind.
- **Information security:** to streamline the mechanics of information security and to elevate the strategic importance of security.
- **Help desk:** to ensure that staff provides consistent and IG-aware responses to systems questions and issues.

» Records Management

- Integration with systems to ensure efficient aggregation of electronic records into the electronic file.
- Reduction of tasks related to physical record keeping.
- Data mapping to identify all systems, designate official repositories and define the temporary use of other storage locations.
- Email management systems to improve filing capabilities so that email is captured into the electronic file.
- Life cycle issues to apply retention periods to closed matters and regular disposition of information at the end of retention periods.
- Management of firm business records, such as finance, human resources, executive management, marketing, office administration, benefits and other operational units.

» Legal Support Processes such as conflicts, client/matter opening and closing, litigation support and docketing.

The streamlining of these and other information-driven processes will organically result in efficiencies that will not only increase lawyer productivity, but may also require less staff support. Additionally, the reengineering process includes an evaluation of the firm's staffing models, providing opportunity to assess not only staff levels, but whether certain functions can be outsourced to lower cost providers.

IG Awareness

The IGO directs efforts to socialize and disseminate IG education and awareness throughout the firm. IG awareness is a campaign to educate all personnel about the importance and benefits of the IG program. To be effective, the message should not reiterate policies or rules, but provide practical guidance about how to manage information in ways that enhance access and lower risk. Training should be delivered to attorneys and staff in a targeted way, focusing on what each individual needs to know to get their job done. Ideally, the awareness program will include a combination of tips, newsletters, intranet training, roadshows, alerts, timely information about “IG in the news,” and hands-on systems training when needed. It should be ongoing, continually refreshing firm personnel on IG developments and initiatives.

Branding

The IG awareness program is a concerted effort to market IG and make it available to all firm personnel. This effort can be enhanced through the development of an IG “brand” that makes the program recognizable and identifiable as a significant strategy for the firm. Below are the elements of a branding campaign for IG:

Guiding Principles: The 2012 report published by this Symposium, [“A Proposed Law Firm Information Governance Framework,”](#) sets forth specific guiding principles for law firm IG.¹² The IGO can leverage these and make them unique to the culture of its firm and its IG strategies. Rather than training to specific policies, the IGO can leverage the principles to support customized training requirements. For example, although there are detailed policies related to information mobility, the IG principle might be: “Don’t handle file transfers on your own - call Records Management.” This is a simpler concept for users to absorb than the detailed policy. The guiding principles thus become a recognized part of the IG brand.

Core Values: It is also helpful to identify the core values of the IG program to give users clarity about the purpose and importance of IG. As an example, one of the primary goals of most IG programs is to develop a sense of accountability among all personnel. A core IG value of “stewardship” is a more strategic way to sell this concept since it appeals to the desire of corporate citizens to support and advance the interests of the organization.

Logo and Communications Template: The firm’s marketing department can help design a uniform look and feel for all communications issued by the IGO. These communications about IG should include everything from policy and process requirements to the new IG organization to improvements in technology.

In combination with the awareness program, branding the IG program will help establish IG as a significant and recognizable part of firm culture.

THE STRUCTURE OF THE IGO

Once the law firm has defined its overall information management goals and objectives and the scope of work for the IGO, it can then establish the appropriate organizational structure to successfully achieve these objectives. The firm's IGO should include a variety of authority levels and skill sets, including individuals who can think strategically as well as tactically. The IGO should have the ability to define strategy and policy, and to implement operational change.

The IGO is an organizational unit that bridges the gap across information silos and systems established throughout the firm, enabling a cohesive and integrated IG program. It brings together constituents from various information management areas, such as technology, information security, records management, litigation support and knowledge management and connects them with senior management and executive leaders from various administrative areas, all with the common purpose of creating an overarching approach to managing firm information assets. However, transforming IG from a set of strategies and policies into a cultural reality also requires operational leaders to reengineer processes and implement specific IG-related initiatives. Therefore, the law firm IGO should consist of two components: governance and operations.

Figure 2 shows the basic relationship between governance and operations within the IGO. Each law firm will need to achieve an appropriate balance between the roles of these two functions. Below is a discussion of the governing body, the operational leaders, how the firm's place on the IG Maturity Scale will impact balance between each of these components of the IGO and potential models for organizational structure.

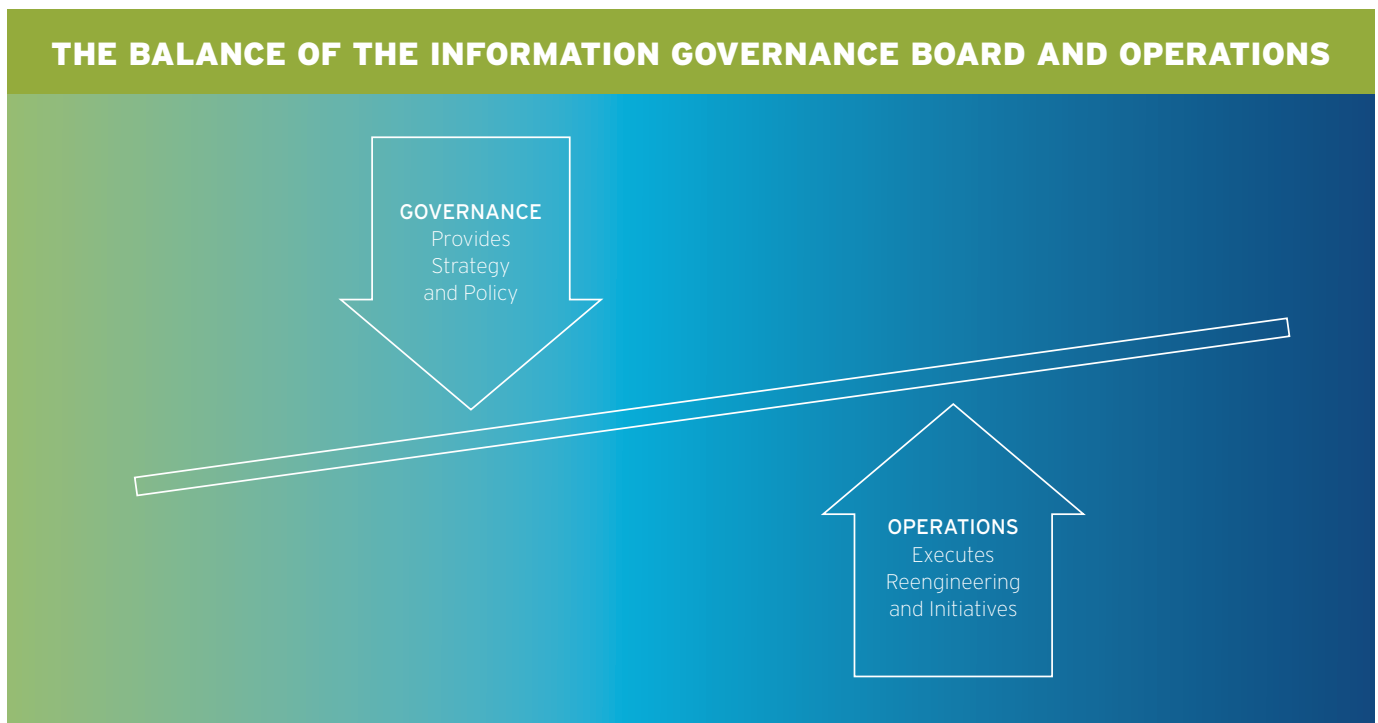


FIGURE 2

IG Governance: The Information Governance Board

The Information Governance Board (IGB) is a formally constituted body that exists within the IGO. It is charged to ensure that the IG program conforms to firm values, goals and objectives,¹³ and strives to make impartial decisions for the benefit of the entire firm.¹⁴ It has the authority to direct a comprehensive program and enforce compliance firmwide. The IGB provides explicit directives on IG procedures and protocols and has the authority to manage expectations and reinforce responsibilities firmwide. The members of the IGB engage and collaborate with stakeholders and build consensus to change behaviors, processes and systems.

To exert this authority, the IGB has strong, high-level executive sponsorship, commitment and visibility, reflecting management's "tone from the top" regarding strategic objectives, the importance of reaching these objectives, expected standards of conduct and accountability.¹⁵ Potential executive sponsors of the IGB include the General Counsel, Managing Partner, Chief Operating Officer or individuals who serve on the firm's Management or Risk Management Committees.

In addition to the executive sponsor, the IGB consists of stakeholders from other key areas of the firm such as:

- » **C-level leaders, including the Chief Information Officer, Chief Risk or Compliance Officer, Chief Human Resources Officer, Chief Financial Officer, Chief Administrative Officer and Chief Marketing Officer. Some firms have created or are contemplating specific C-level positions related to IG, such as Chief Information Governance Officer or Chief Information Security Officer. If these roles exist, they should also be included as board members.**
- » **Operational directors or managers from technology, records management, knowledge management and litigation support.**
- » **Partners or other attorneys, specifically including those who practice in the area of privacy, security, eDiscovery or healthcare. Practice group leaders of areas that have particular IG concerns can also be included.**

Operational Leadership Within the IGO

All members of the IGO have responsibilities to participate in or directly support IG initiatives that impact the operations of the firm. Individuals in charge of information management areas, such as technology, records management, knowledge management and litigation support, have obvious roles to play within the IGO since they will implement most of the tactical IG program.

The IG responsibilities of business leaders from human resources, finance, office administration and marketing, may seem less apparent. Certainly leaders from these areas are responsible for implementing IG requirements within their own department systems and processes, and for ensuring that their personnel understand and follow IG policies and procedures. In this respect, their membership in the IGO provides educational benefit, since it will expose them to concepts that are not generally part of their thinking.

In addition, because the full implementation of IG requires change at all levels of the organization, these key leaders have specific roles to play in the IGO. For example, IG will require changes to employee skill sets, job duties and performance requirements, and may even result in the elimination of certain jobs that become obsolete. Including expertise from human resources within the IGO will ensure that staffing changes are done consistently and with an awareness of the firm's policies and legal requirements. Table 1 illustrates the value that operational leaders from key functional areas can bring to the IGO.

THE ROLE OF OPERATIONAL LEADERS IN THE IGO

IG ACTIVITY	FUNCTIONAL LEADERSHIP
Policy and Compliance	<ul style="list-style-type: none"> • Legal Department (General Counsel or firm ethics attorney) • Executive sponsors (Managing Partner or Chief Operating Officer) • Subject matter lawyer (privacy/security lawyer) • Information management (leaders from Technology, Records Management, Information Security)
Funding	<ul style="list-style-type: none"> • Executive sponsors (Managing Partner or Chief Operating Officer) • Finance (leader from Accounting or Finance)
Technology Changes	<ul style="list-style-type: none"> • Technology (Chief Information Officer) • Information security (Chief Security Officer)
Process Changes	<ul style="list-style-type: none"> • Information management (leaders from Technology, Records Management, Information Security, Knowledge Management, Litigation Support) • Representatives from law departments or practice areas (Litigation Docket, Intellectual Property Docket, etc.) • Leaders from other business units (Accounting, Human Resources, Marketing, Conflicts, Docketing, etc.)
Staffing Changes	<ul style="list-style-type: none"> • Human Resources (Chief HR Officer) • Administration (Chief Administrative Officer or office administrators) • Leaders from affected business units (Technology, Records Management, etc.)
Branding and Communication	<ul style="list-style-type: none"> • Marketing (Chief Marketing Officer, Communications Director)
Change Management	<ul style="list-style-type: none"> • Executive Sponsors (Managing Partner or Chief Operating Officer) • Information management (leaders from Technology, Records Management, Information Security, Knowledge Management, Litigation Support) • Project Management Office • Marketing (Chief Marketing Officer, Communications Director) • Other functional leaders

TABLE 1



The Balance of Governance and Operations in the IGO

In general, the lower the firm falls on the IG Maturity Scale, the more significant is the role of the governance component of the IGO (i.e., the IGB). In other words, firms with less developed approaches to information management will need stronger governance bodies to define what should be done. These firms may not have strong operational leaders in technology, record management or other knowledge areas, and thus will require direction from the IGB to implement specific programs and initiatives. Firms at the low end of the IG Maturity Scale might also need to engage an outside consultant to help them define their IG strategy, and to work with operational units to implement IG tactics.

On the other hand, firms that rank higher on the IG Maturity Scale will already have strong information management leaders who can define much of the firm's IG framework themselves relying on the IGB instead for advisory guidance and support.

Figure 3 shows how the firm's placement on the IG Maturity Scale affects the balance between the IGB and IG Operations.

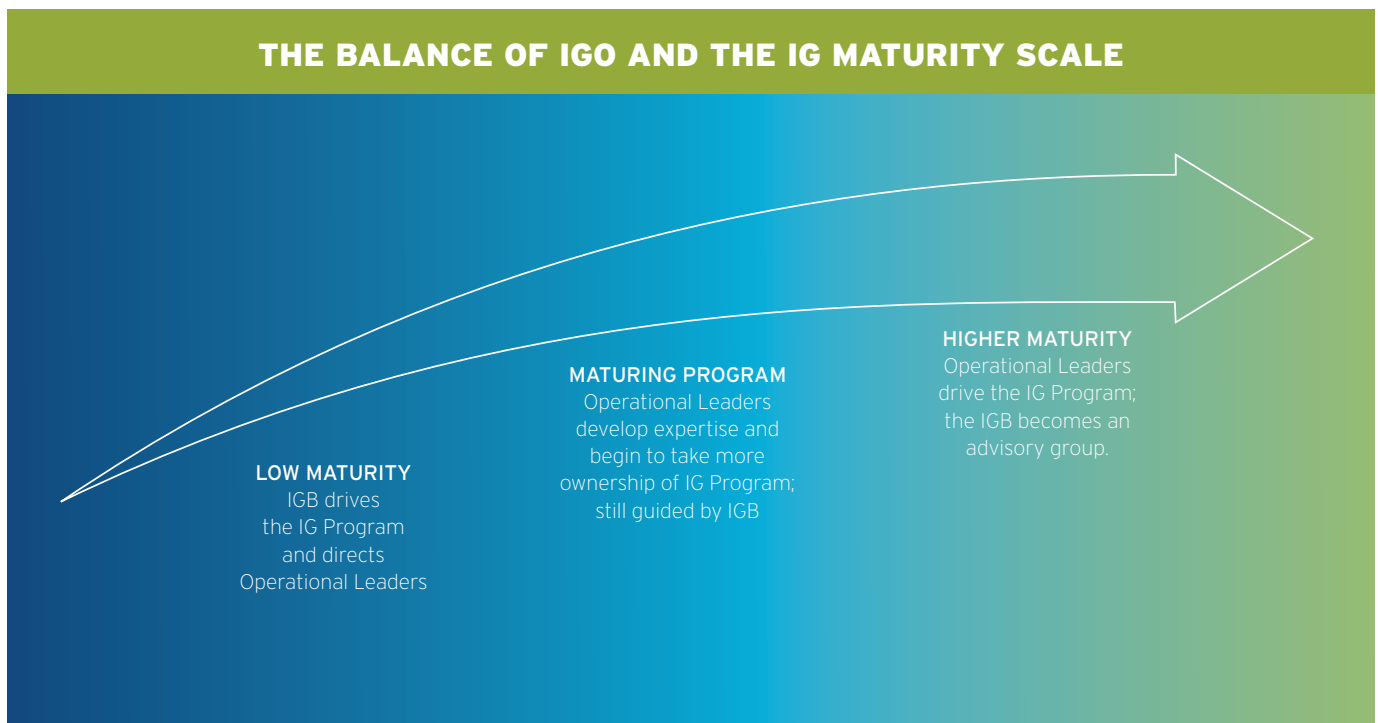


FIGURE 3

Structural Models for the IGO

The above discussion presents the IGO, with its component parts of governance and operational leadership, as a robust and formally defined body. This report recognizes, however, that law firms differ not only in their placement on the IG Maturity Scale, but in their overall structure, organization, resource availability and culture. Therefore, there are multiple structural approaches firms can take to ensure sufficient stakeholder participation in IG. Below are illustrations of three different models, which reflect a spectrum that includes a formally constituted IGO, an

IGO where operational leaders leverage an advisory governance board, and a model where operational IG leaders leverage and consult with management and other functional leaders on an as-needed basis. All of these models assume sponsorship and support for IG from senior management.

Formally Constituted IGO: In this model (see Figure 4) the firm creates a formal IGO with both an IGB and an operational team. As noted above, the balance of influence between governance and operations might vary depending on the firm and its IG maturity, but this model illustrates a firm where governance has the primary driving role.

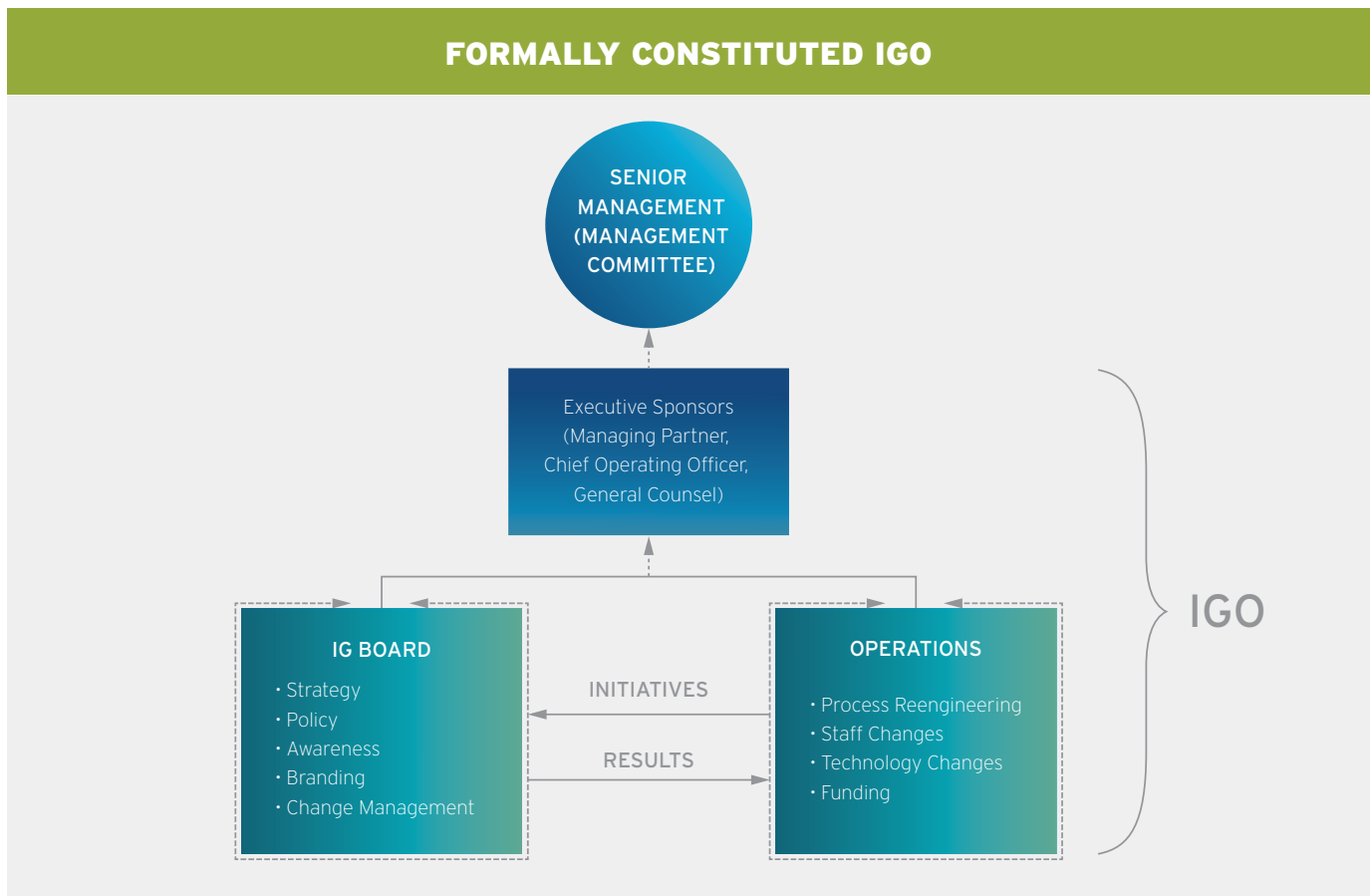


FIGURE 4

IGB as Advisor: In the second model (see Figure 5) firms have information management leaders who have sufficient experience, authority and influence to drive IG, with advisory support from the IGB. In these firms, information management leaders such as the Chief Information Officer, Chief IG Officer, Records Manager or Chief Security Officer develop the firm's IG strategy and policies as well as the tactical goals. They seek periodic advice from the IGB, and rely on the IGB for management approval to move forward.

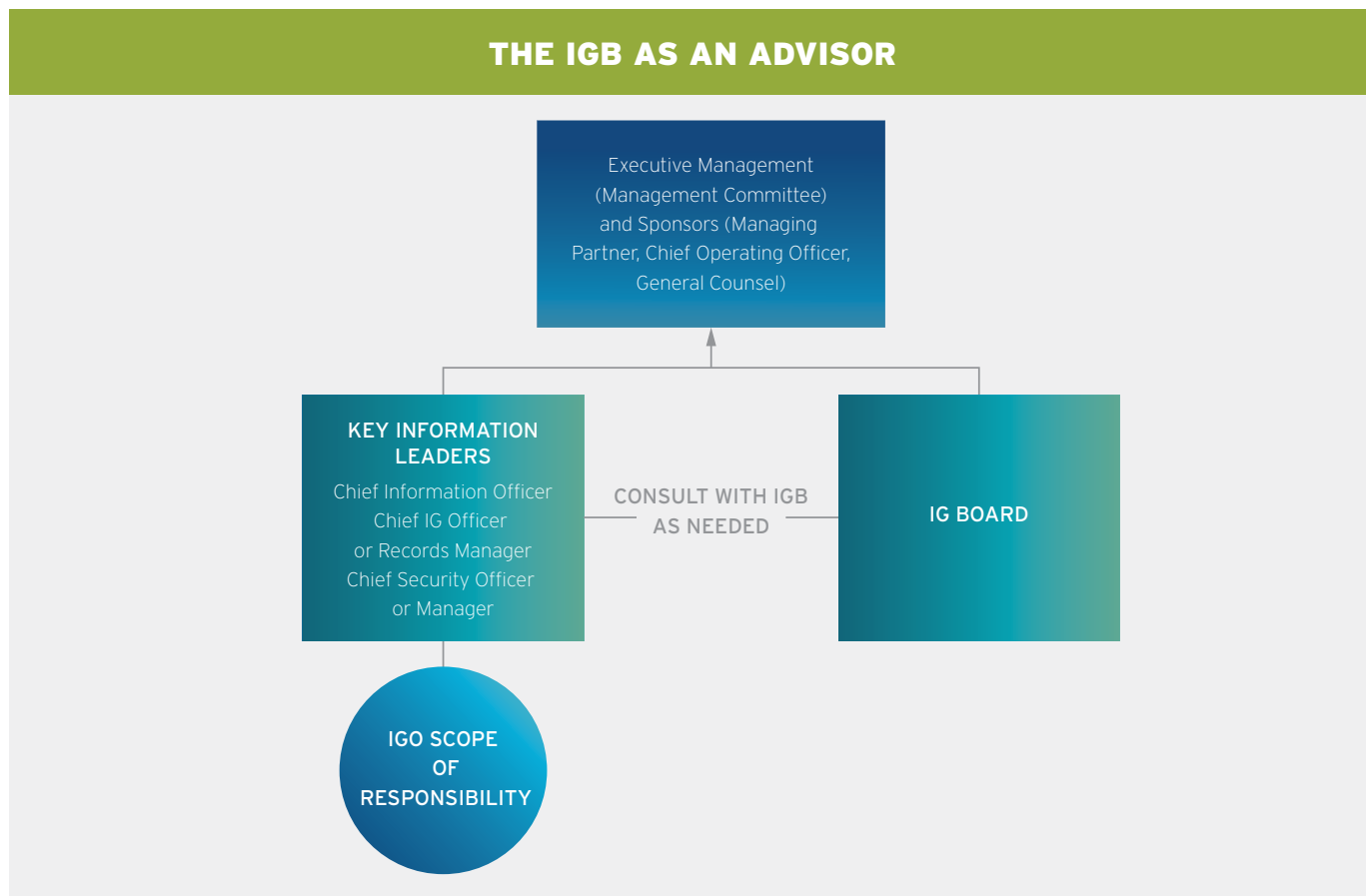


FIGURE 5

Informal IGO: In this last model (see Figure 6), although senior firm leadership supports IG, there is no formally constituted body to drive it. IG is led by key information management leaders, who obtain advice, approvals and resources from appropriate stakeholders as needed.

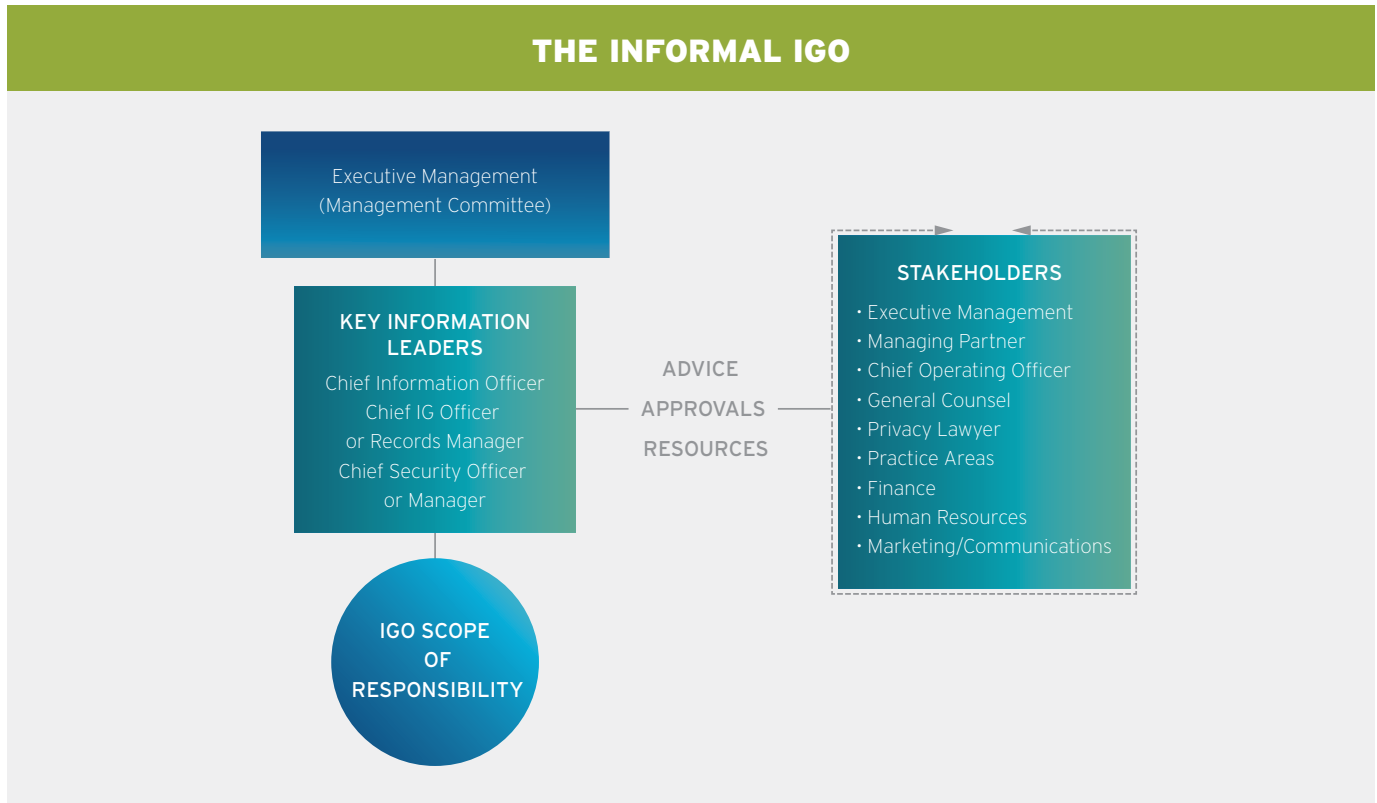


FIGURE 6

DEVELOPING THE IGO AND THE IG PROGRAM

The IGO and the IG program are organic. They will grow in scope, visibility and influence as the firm achieves specific IG strategies and associated tactical goals. Executive leaders should expect the IGO to regularly measure and report on IG activities to validate whether they are meeting expectations related to enhanced productivity, and cost and risk management. Additionally, leaders should expect the IGO to continually scan the industry, the law and the broader business environment to identify new requirements, technologies or trends that will impact the IG program. Finally, as the firm's IG maturity increases, it will make the shift from dependence on the IGB as the primary driver to a greater reliance on operational leaders. This might result in the creation of IG-related positions designed to more effectively leverage the time and commitment of other stakeholders and provide deeper subject matter focus on the program.

MEASURING SUCCESS, AUDITING AND CONTINUOUS IMPROVEMENT

Measurements

The IGO, through its operational leaders, should devise and adopt methodologies to measure the impact IG has had on the firm's stated goals. This should be done at defined milestone periods, and results should be reported to senior management. Potential areas of measurement include staff reductions, storage cost reductions (both physical and digital), compliance issues and improvements in attorney/staff productivity. A variety of tools can be used, such as systems reports and data, surveys and interviews with end users. Auditing, as described below, is another form of measurement to gauge success.

Auditing

The IGO should audit certain IG systems and processes on a regular basis to identify areas of non-compliance. This includes, for example, examining matter-centric workspaces to confirm that information is organized appropriately and to spot potentially misfiled information. In addition, the IGO, through the technology or security departments, can apply tools to various network locations to look for information that is unstructured or improperly secured. For example, it is possible to use certain key words and patterns to spot sensitive firm-related management information, unsecured PII (bank account, credit card, or social security numbers) or PHI. Other examples include monitoring personal devices connected to the firm's network to ensure that client or firm data is appropriately stored, or conducting periodic social engineering tests to measure end users' awareness of suspicious email or other online activity.

The results of these auditing efforts provide the IGO with the opportunity to work directly with end users to reinforce IG requirements.

Continuous Improvement

Routine and regular measurement and audit may reveal potential areas of improvement for specific IG processes. Additionally, each member of the IGO should be aware of changes in law, technology or the legal industry that require review and modification of IG processes. In addition, changes within the firm will also drive change and improvement in IG. The acquisition of new areas of practice might result in new record types or regulatory obligations. If the firm opens offices in new US states or international jurisdictions, its ethical or other legal compliance obligations will also change.

DEVELOPING THE IG TEAM

As the firm's IG capabilities grow and the program becomes more comprehensive, the IGO might need to consider creating new IG-related roles. Some of these could be tactically focused, while others could be higher level positions of leadership. The latter positions might affect the structure of the IGO itself, adding greater levels of skill and strategic ability to both the IGB and the operations component of the IGO.

One position that some law firms have already created is a Chief Information Governance Officer (CIGO). This individual can function in two different ways. First, the CIGO oversees the IG policy framework and acts as an independent consultant to the IGO. In this scenario, the CIGO provides the objectivity required to conduct the measurement, auditing and continuous improvement tasks discussed above. The CIGO might have a minimal staff to assist with these tasks.

Alternatively, the CIGO could lead an information governance department, which could include the records management team, as well as other IG-related functional units such as information security, knowledge management, disaster recovery or audit. The CIGO with these responsibilities becomes the senior IG driver among the operational leaders on the IGB.

Another leadership position that the IGO could create is the Chief Information Security Officer (CISO) who provides direction for the information security function outside of the technology department. In this situation, the CISO elevates the security function from its tactical focus to a more strategic and information risk-based function, and provides the independence necessary to effectively audit operational security processes conducted by the technology department.



CONCLUSION

IG is a mechanism that law firm executive leaders can leverage to achieve critical business goals. These goals include managing cost, lowering staff to attorney ratios and managing information risk. Law firms wishing to implement an IG program need a focused group of knowledgeable and skilled stakeholders from a cross-section of the firm to evaluate the firm's information management needs, identify specific IG strategies and initiate the projects and programs that will drive the cultural and behavioral changes needed to make IG a success. The IGO, with its governance and operations components, is the agent that transforms the firm into a more effective, productive and fully mature, IG-enabled organization.



REFERENCES

- 1 Jones, J. (2014, March 7). *Market Update: Is Bigger Always Better?* Retrieved from <https://www.law.georgetown.edu/academics/centers-institutes/legal-profession/upload/2014-Market-Update-Is-Bigger-Always-Better-3-7-14-3.pdf>
- 2 Law Firm Information Governance Symposium. (2012, August). *A Proposed Law Firm Information Governance Framework*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/A/A-Proposed-Law-Firm-Information-Governance-Framework.aspx>
- 3 Hansen, S. (2015, March 19). *Cyber Attacks Upend Attorney-Client Privilege*. Retrieved from <http://www.bloomberg.com/news/articles/2015-03-19/cyber-attacks-force-law-firms-to-improve-data-security>. See also: Goldstein, M. (2015, March 26). *Citigroup Reports Chides Law Firms for Silence on Hackings*. http://www.nytimes.com/2015/03/27/business/dealbook/citigroup-report-chides-law-firms-for-silence-on-hackings.html?_r=1
- 4 Nelson, S. D. & Simek, J. W. (2013, November/December). *Clients Demand Law Firm Cyber Audits*. Retrieved from http://www.americanbar.org/publications/law_practice_magazine/2013/november-december/hot-buttons.html. See also: Passerella, G. (2014, March 4). *Law Firms Face Pressure from Clients on Data Security*. Retrieved from <http://www.thelegalintelligencer.com/id=1202645216004/Law+Firms+Face+Pressure+From+Clients+on+Data+Security%3Fmcode=0&curindex=0&curpage=ALL>
- 5 Thompson Reuters (2014). *Peer Monitor Index: Q4 2014 Executive Report*. Retrieved from https://peermonitor.thomsonreuters.com/wp-content/uploads/2015/02/PMI_Q4_2014.pdf
- 6 Ponemon Institute (2014, May). *2014 Cost of Data Breach Study: Global Analysis*. Retrieved from http://www-935.ibm.com/services/multimedia/SEL03027USEN_Poneman_2014_Cost_of_Data_Breach_Study.pdf In this report, data breach costs are estimated at \$201 per record (in the US).
- 7 Ames & Gough. (2013, June 18). *Lawyers' Professional Liability Claims Trends: 2013*. Retrieved from <http://www.amesgough.com/survey-most-leading-law-firm-insurers-see-rise-malpractice-claims-frequency-severity>
According to a 2013 survey by insurance broker Ames & Gough, 71% of the surveyed insurers reported an increase in law firm malpractice claims in 2012, including those involving multi-million-dollar payouts. In this environment it becomes critical for firms to have processes in place to manage the firm's risk and ability to efficiently respond to litigation and regulatory or other investigations of the firm itself, as opposed to its clients. Additionally, as more firms invest in cyber insurance it will be interesting to see how premiums are affected by strong breach management.
- 8 See list of Authorities (below) for previous Law Firm Information Governance Symposium publications. See also the following three publications, part of the ARMA International Information Governance in the Legal Environment series.
Chiaiese, B. (2013). *Ethical and Legal Foundations of Law Firm Records Management and Information Governance*. For purchase. Retrieved from <https://members.arma.org/eweb/browse.aspx?site=armastore&webcode=product&id=18592e81-875b-4ebb-89ed-717cb106aabc#.VXiIvE9VhHw>
Chiaiese, B. (2013). *Lawyer and Matter Mobility*. For purchase. Retrieved from <https://members.arma.org/eweb/browse.aspx?webcode=product&id=3098f15d-b69a-4363-8c19-4831ce75eb61#.VXiLC09VhHw>

Chiaiese, B. (2015). *Confidentiality, Privacy and Information Security: A Primer for Law Firm and Records and Information Governance Professionals*. For purchase. Retrieved from <https://members.arma.org/eweb/browse.aspx?site=armastore&webcode=product&id=d4d496e8-d248-4d8a-8740-c4dc31dbf082#.VbooHrNVhBc>

9 Ibid.

10 ARMA International. (n.d.). *Information Governance Maturity Model*. Retrieved from <http://www.arma.org/r2/generally-accepted-br-recordkeeping-principles/metrics>

11 In general, a system must have the following characteristics to be designated as an official recordkeeping repository: the ability to classify or aggregate information by a common denominator such as a client/matter number, the ability to apply security permissions, the ability to preserve information (prevent modification), and the ability to permanently destroy or delete information based on system policies.

12 Law Firm Information Governance Symposium. (2012, August). *A Proposed Law Firm Information Governance Framework*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/A/A-Proposed-Law-Firm-Information-Governance-Framework.aspx>

13 Law Firm Information Governance Symposium. (2013, July). *Building Law Firm Information Governance: Prime Your Key Processes*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/B/Building-Law-Firm-Information-Governance.aspx>

14 The Sedona Conference. (2014, Fall). *The Sedona Conference Commentary on Information Governance*. Retrieved from <https://thesedonaconference.org/publication/The%20Sedona%20Conference%C2%AE%20Commentary%20on%20Information%20Governance>.

15 Ibid.

BIBLIOGRAPHY

AUTHORITIES

Law Firm Information Governance Symposium. (2014, July). *eDiscovery and Information Governance Task Force Report: Applying Information Governance to Law Firm eDiscovery Data*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/E/eDiscovery-and-Information-Governance-Task-Force-Report.aspx>

Law Firm Information Governance Symposium. (2014, July). *Outside Counsel Guidelines Management: An Information Governance Issue*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/E/Emerging-Trends-Task-Force-Report-Outside-Counsel-Guidelines-Management.aspx>

Law Firm Information Governance Symposium. (2014, July). *HIPAA Omnibus Task Force Report*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/H/HIPAA-Omnibus-Task-Force-Report.aspx>

Law Firm Information Governance Symposium. (2014, July). *Emerging Trends Task Force Report: A Profile of the Law Firm Information Governance Professional*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/E/Emerging-Trends-Task-Force-Report-A-Profile-of-the-Law-Firm-Information-Governance-Professional.aspx>

Law Firm Information Governance Symposium. (2014, July). *Matter Mobility Task Force Report*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/M/Matter-Mobility-Task-Force-Report.aspx>

Law Firm Information Governance Symposium. (2013, July). *Building Law Firm Information Governance: Prime Your Key Processes*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/B/Building-Law-Firm-Information-Governance.aspx>

Law Firm Information Governance Symposium. (2012, August). *A Proposed Law Firm Information Governance Framework*. Retrieved from <http://www.ironmountain.com/Knowledge-Center/Reference-Library/View-by-Document-Type/White-Papers-Briefs/A/A-Proposed-Law-Firm-Information-Governance-Framework.aspx>

ARTICLES AND OTHER PUBLICATIONS

Ames & Gough. (2013, June 18). *Lawyers' Professional Liability Claims Trends: 2013*. Retrieved from <http://www.amesgough.com/survey-most-leading-law-firm-insurers-see-rise-malpractice-claims-frequency-severity>

ARMA International. (n.d.). *Information Governance Maturity Model*. Retrieved from <http://www.arma.org/r2/generally-accepted-br-recordkeeping-principles/metrics>

Bradley, A. & Fox, U. (2011, January/February). *RIM Fundamentals: Back to the Future: Time-Tested Fundamentals Meet Challenges of Technology*. Retrieved from <http://content.arma.org/IMM/January-February2011/IMM0111rimfundamentalsbacktothefuture.aspx>

Chiaiese, B. (2015). *Confidentiality, Privacy and Information Security: A Primer for Law Firm and Records and Information Governance Professionals*. Part of the ARMA International Information Governance in the Legal Environment series. For purchase. Retrieved from <https://members.arma.org/eweb/browse.aspx?site=armastore&webcode=product&id=d4d496e8-d248-4d8a-8740-c4dc31dbf082#.VbooHrNVhBc>

Chiaiese, B. (2013). *Ethical and Legal Foundations of Law Firm Records Management and Information Governance*. Part of the ARMA International Information Governance in the Legal Environment series. For purchase. Retrieved from <https://members.arma.org/eweb/browse.aspx?site=armastore&webcode=product&id=18592e81-875b-4ebb-89ed-717cb106aabc#.VXiIvE9VhHw>

Chiaiese, B. (2013). *Lawyer and Matter Mobility*. Part of the ARMA International Information Governance in the Legal Environment series. For purchase. Retrieved from <https://members.arma.org/eweb/browse.aspx?webcode=product&id=3098f15d-b69a-4363-8c19-4831ce75eb61#.VXiLC09VhHw>

Ezekiel, A. W. (2013, Spring). *Hackers, Spies, and Stolen Secrets: Protecting Law Firms from Data Theft*. Harvard Journal of Law & Technology. Retrieved from <http://jolt.law.harvard.edu/articles/pdf/v26/26HarvJLTech649.pdf>

Goldstein, M. (2015, March 26). *Citigroup Report Chides Law Firms for Silence on Hackings*. The New York Times. Retrieved from http://www.nytimes.com/2015/03/27/business/dealbook/citigroup-report-chides-law-firms-for-silence-on-hackings.html?_r=1

Gunnarsson, H. W. (2013, August 28). *Firms Must Keep Watch Against Hacking And Other Intrusions on Confidential Data*. ABA/BNA Lawyers' Manual on Professional Conduct. Retrieved from <http://www.iasb.mys1cloud.com/2013ABAmeetingcybersecurityarticle.pdf>

Hansen, S. (2015, March 19). *Cyber Attacks Upend Attorney-Client Privilege*. Retrieved from <http://www.bloomberg.com/news/articles/2015-03-19/cyber-attacks-force-law-firms-to-improve-data-security>

Jones, J. (2014, March 7). *Market Update: Is Bigger Always Better?* Retrieved from <https://www.law.georgetown.edu/academics/centers-institutes/legal-profession/upload/2014-Market-Update-Is-Bigger-Always-Better-3-7-14-3.pdf>

Magliato, C. (2012, September). *Making BYOD Work for Legal*. Peer to Peer Magazine, International Legal Technology Association. Retrieved from <https://www.mindshift.com/Company/News-and-Events/~//media/Files/ILTA-Peer-to-Peer-Making-BYOD-Work-for-Legal-September-2012.ashx>

Nelson, S. D. & Simek, J. W. (2013, November/December). *Clients Demand Law Firm Cyber Audits*. Law Practice Magazine, American Bar Association. Retrieved from http://www.americanbar.org/publications/law_practice_magazine/2013/november-december/hot-buttons.html

Passerella, G. (2014, March 4). *Law Firms Face Pressure from Clients on Data Security*. The Legal Intelligencer. Retrieved from <http://www.thelegalintelligencer.com/id=1202645216004/Law+Firms+Face+Pressure+From+Clients+on+Data+Security%3Fmcode=0&curindex=0&curpage=ALL>

Paván, P. (2013, September). *"Bring-Your-Own-Device" and Your Company*. Business Law Today, American Bar Association. http://www.americanbar.org/publications/blt/2013/09/01_pavon.html

Ponemon Institute (2014, May). *2014 Cost of Data Breach Study: Global Analysis*. Retrieved from http://www-935.ibm.com/services/multimedia/SEL03027USEN_Poneman_2014_Cost_of_Data_Breach_Study.pdf

Riley, M. & Lawrence, D. (2012, July 27). *Hackers Linked to China's Army Seen From EU to D.C.* Retrieved from <http://www.bloomberg.com/news/2012-07-26/china-hackers-hit-eu-point-man-and-d-c-with-byzantine-candor.html>

Seah, J. (2013, February 25). *China Hacking Report Raises Alarm at Firms*. Practice Source. Retrieved from <http://practicesource.com/asian-lawyer-reports-on-chinas-hacking-of-foreign-law-firms>

Smith, J. (2012, June 25). *Client Secrets at Risk as Hackers Target Law Firms*. The Wall Street Journal Law Blog. Retrieved from <http://blogs.wsj.com/law/2012/06/25/dont-click-on-that-link-client-secrets-at-risk-as-hackers-target-law-firms>

The Sedona Conference. (2014, Fall). *The Sedona Conference Commentary on Information Governance*. Retrieved from <https://thesedonaconference.org/publication/The%20Sedona%20Conference%C2%AE%20Commentary%20on%20Information%20Governance>.

Thompson Reuters (2014). *Peer Monitor Index: Q4 2014 Executive Report*. Retrieved from https://peermonitor.thomsonreuters.com/wp-content/uploads/2015/02/PMI_Q4_2014.pdf

Walker, M. (2012, December 19). *Structured vs. Unstructured Data: The Rise of Data Anarchy*. Data Science Central. Retrieved from <http://www.datasciencecentral.com/profiles/blogs/structured-vs-unstructured-data-the-rise-of-data-anarchy>



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