

## Social Media Compliance

# RECORDS MANAGEMENT STRATEGIES FOR SOCIAL MEDIA COMPLIANCE

## Contents

- 2 A Collaborative Effort.
- 2 Challenges for Social Media RIM.
- 4 Best Practices for Managing Social Media Compliance.
- 5 Conclusion.

Social media is fast becoming one of the defining applications for next-generation business environments. Social media platforms are being used not just for marketing, but also for collaboration, customer trending information, business communications, big data analytics and a host of other activities that organizations are still exploring and defining.

IDC characterizes social networking as one of the four pillars of computing's next major platform, and Forrester Research has noted that sales of software to run corporate social networks are growing by more than 60 percent a year. Even USA Today has gotten into the act, citing social media as a trend that is "redefining how business is done."

The growing use of social media, however, brings new risks to businesses. While many IT professionals are focused on the security challenges inherent in enabling social media, there is one other important area that must not be overlooked: the impact of social media on records management.

Every tweet, blog post, response to a blog post, corporate YouTube post, text, e-mail, instant message, wiki collaboration or other related activity represents a potential corporate record that must be managed in order for the organization to be compliant with regulatory and, potentially, eDiscovery requirements.

The challenge in managing these additional new records comes at a time when electronic records management in general is gaining more and more attention, scrutiny and import. It also comes at a time when organizations are producing much more data than ever: According to an article in Smithsonian Magazine, by 2013, we will be generating as much data every 10 minutes as was generated throughout the entire history of humanity through 2003.

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## **A COLLABORATIVE EFFORT PLAN**

As IT professionals manage the challenges of deploying social media to support business initiatives, they must make sure they are working with records information management (RIM) professionals within their organizations to adopt best practices for overall records management. At the same time, RIM professionals must be involved in working with IT to create corporate strategies for social media that address how and where records are stored, how long they are kept, where they are kept, how they are disposed of, how they are tagged and how they are accessed.

Without this type of unified and collaborative approach, organizations run the risk of regulatory noncompliance, loss of important records, failure to meet eDiscovery demands in a reasonable time period and other challenges that can lead to fines, penalties and damage to the company's reputation, productivity and bottom line.

Developing a unified and collaborative approach to records management for social media will follow along the lines of the same best practices for records management throughout the organization. The challenge, however, is focusing on social media as an initiative - and doing it now.

Why now?

One of the reasons to make social media in RIM a priority is because such records are growing rapidly in volume and intensity: Failure to take action quickly will bury you in records, increase your costs and make it that much harder to get your records management under control. According to the IDC Digital Universe study, the amount of data being created is doubling every two years, and the bulk of that data - more than 90 percent of it - is the type of unstructured data typically generated through social media applications.

It is also important to get the right policies and solutions in place quickly because, quite frankly, records generated through social media run the risk of falling below the radar in many organizations. Nearly 50 percent of business managers said they were unaware that they are legally liable for their social media content, according to research conducted by Iron Mountain. In addition, a third of businesses surveyed described their management of social media as “unmanaged and chaotic.” For example, only 35 percent of the managers in the Iron Mountain survey said they are able to classify and index user-created records at the time of their creation or later in their life cycle.

## **CHALLENGES FOR SOCIAL MEDIA RIM**

While there is a great urgency to get control over the management of social media records, it is important to understand that these records are part of a much bigger organizational picture. Social media records must be managed in the context of all records management within the organization. That means they must be:

- Classified according to their value
- Tabbed and indexed so they can be located and retrieved in a timely manner
- Backed up, replicated and/or archived according to company policy
- Managed throughout their life cycle to account for compliance and eDiscovery requirements. The reality is that all records within the organization - hard copy and digital - should be part of the same processes and policies, including social media. That is why most organizations are turning to unified records management (URM) as a major part of their strategy for social media compliance.

The reality is that all records within the organization - hard copy and digital - should be part of the same processes and policies, including social media. That is why most organizations are turning to URM as a major part of their strategy for social media compliance.

With URM, organizations have a centralized means to access both paper and electronic documents quickly, while managing onsite and offsite files, consistently classifying data, applying legal holds and setting retention periods.

So how should organizations get their management of social media records under proper control? Here are some of the key considerations for developing and implementing URM:

**1. SET PROPER POLICY:** Include key aspects such as governance, communication, education/training and implementation. Having the right policies in place for the management of social media records during their life cycle will help the organization deal with compliance and eDiscovery requirements. Proper policies will also help achieve significant cost savings, because the organization will be storing and saving documents based on their value over their life cycle. Once the organization has defined its policies for classifying and managing its records, it is important to roll out the policy across the organization and include all information types. While 80 percent of organizations reported that they have formal policies for RIM, only 37 percent said those policies are consistently applied, according to Iron Mountain's research. The pervasive

growth of social media is making it even more challenging to keep policies relevant, current and compliant.

**2. MAKE RETENTION AND COMPLIANCE A PRIORITY:**

Retention covers both the preservation and destruction of information when it reaches the end of its business life cycle. It applies to all business records, including e-mail communications, business tweets, texts, instant messages, Facebook posts and all ranges of social media activities. Effective retention schedules should be regularly updated to comply with changing regulations, compliance requirements and business needs.

**3. ENSURE THAT INFORMATION IS EASILY IDENTIFIABLE AND READILY AVAILABLE:**

Any organization that can quickly identify and retrieve records enjoys a competitive advantage, enhanced productivity and greater protection from regulatory or discovery noncompliance. Organizations should classify information based on key identifiers such as record location, subject, author, date and method of origination, system of creation and intended recipient. There should be systems and policies in place to classify and tag information at the point of creation. Once information is classified, tagged and indexed, the organization can define authorizations and security controls to ensure that the records are available when needed and that only those with proper authorization can access them. Successfully incorporating these processes and policies will also enable the organization to more easily apply litigation holds.

**4. PROTECT AND DISPOSE OF RECORDS THE RIGHT WAY:**

By following consistent practices for safeguarding and properly disposing of information, an organization can reduce the risks of exposure and theft - while also helping to control storage costs. Documenting detailed instructions on how records are identified and approved for disposal - as well as the processes for secure destruction - can prevent against inadvertent disclosure or improper destruction. This is key in making sure the organization follows proper compliance procedures and is responsive to eDiscovery inquiries.

**5. AUDIT POLICIES AND MAKE THE ENTIRE ORGANIZATION ACCOUNTABLES:** In order to successfully drive enterprise-wide adoption of records management and information, it is important to build a culture of knowledge and accountability. One step toward this goal is to conduct regular audits that follow defined metrics for success. It is also important to proactively train employees and then make them accountable for their roles in ensuring consistent adherence to policies. Provide visibility, encouragement and support for the overall program at the highest levels of the organization.

### **BEST PRACTICES FOR MANAGING SOCIAL MEDIA COMPLIANCE**

Building a solid foundation for a URM plan that incorporates and accounts for the growth of social media is essential for businesses today. The keys to a strong foundation are policy setting, management and enforcement; unification of physical records; unification of electronic records; and solutions, policies and procedures for retention, training, communication, business continuity, disaster recovery, legal holds and other basic requirements.

Here are some of the best practices for dealing with social media records as part of a total URM solution:

- **Compliance:** The organization should develop and roll out an overarching RIM program with a formal policy that covers key aspects such as governance, communication, implementation and regular training. These policies should reflect all business transactions, including everything related to social media. The policies must make sure to state how long specific social media records should be retained.
- **Retention:** The organization should establish a records retention schedule as part of its RIM program, and install policies and procedures that ensure consistent application of the retention schedule across all locations and all types of records.

- **Indexing and Accessing Records:** A best-practices index and access strategy should cover all record types with consideration for variables such as the likelihood of a record being requested, priority of record content, as well as speed and cost to produce the record.
- **Privacy and Disposal:** Best-practice compliance for privacy and disposal requires the development of a policy supported by the implementation of a program. The policy should incorporate an accurate classification of records that links to retention policies along with documented instructions on how records are identified and approved for destruction.
- **Audit and Accountability:** A best-practices-based RIM program has clear and established ownership and accountability. In addition, the organization should develop and implement a process for periodic audits.

### **CONCLUSION**

The challenges of managing social media are still being defined. Not only are users creating untold volumes of new records every day, but there are new issues organizations have to deal with around initiatives such as the growing bring-your-own-device (BYOD) trend:

Here are some of the best practices for dealing with social media records as part of a total URM solution:

- How does BYOD impact RIM, and what kinds of policies around RIM must be enforced?
- How do highly collaborative platforms such as Microsoft SharePoint impact an organization's retention and compliance policies for records management?

These are the types of critical questions that must be addressed and answered in today's rapidly changing social media environment.

The most cost-efficient and safest approach to building a URM solution that reflects best practices in social media compliance is to work with a third-party partner such as Iron Mountain, which delivers knowledge, expertise and state-of-the-art solutions for records management in today's social media environment.

## Social Media Compliance

With a complete focus on records management, only a company like Iron Mountain has the knowledge and expertise to stay up to date on the myriad records management challenges and solutions in a social media world.

Social media is here to stay. Noncompliance is not an option. It's time to make sure your organization has effective, cost-efficient and fully compliant solutions.



**ABOUT IRON MOUNTAIN.** Iron Mountain Incorporated (NYSE: IRM) provides information management services that help organizations lower the costs, risks and inefficiencies of managing their physical and digital data. Founded in 1951, Iron Mountain manages billions of information assets, including backup and archival data, electronic records, document imaging, business records, secure shredding, and more, for organizations around the world. Visit the company Web site at [www.ironmountain.com](http://www.ironmountain.com) for more information.

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