Here Comes the Chief: Understanding Why the Role of CIGO is a Crucial Development in IG

ARMA Metro NYC
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Barclay T. Blair  Ann Snyder
Where Has Leadership Failed?

- Everybody is trying to solve the same problem, but nobody talks to each other
  - What information do we have?
  - Where is it?
  - What form is it in?
  - What does it take to manage it?
  - What rules need to apply it?
  - What opportunity and risk does it represent?

- IG will never be successful unless and until there is a leader who can:
  - Coordinate amongst the facets of IG
  - Address conflicts
  - Leverage Synergies
The Coordinating Function of IG

The facets of information governance. IG is a coordinating function for these activities.

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<table>
<thead>
<tr>
<th>Responsibilities of Information Leaders, Compared</th>
<th>GC</th>
<th>CDO</th>
<th>CIO</th>
<th>CPO</th>
<th>CISO</th>
<th>CIGO</th>
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<tr>
<td>Managing and Securing PII</td>
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<td>Analytics, big data, and process improvement and value creation</td>
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<td>Retention and disposition</td>
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Gaps in the IG Operational Matrix

What practitioners told us a RACI matrix for information governance should look like. Answers listed in order of popularity.

**Responsible (the doers):**
- RIM
- Information Security and Protection
- Legal
- Compliance
- Business Operations and Management
- Risk Management
- Data Storage and Archiving
- Privacy

**Accountable (the bosses):**
- Senior Business Management such as CEO, SVP, VP
  (The second most popular answer was: Senior Legal such as General Counsel, VP of Legal, Head of Litigation. The third most popular was: Senior IT such as CIO, VP of Technology, IT Lead)

**Consulted (the advisors):**
- Legal
- Information Security and Protection
- RIM
- Business Operations and Management
- Compliance
- Risk Management
- Audit
- Privacy

**Informed (the dependents):**
- Business Operations and Management
- Legal
- Information Security and Protection
- RIM
- Audit
- Finance
- Risk Management
- Privacy

(Only one person in this role)
The Importance of Coordination

- Operational matrices often identify gaps in the “Accountable” role.
- C-Suite support is critical for IG efforts to succeed.
  - Results of IGI’s benchmarking interviews
- To be effective, all of the parts of an IG program must be coordinated into an operational whole.
- Coordinating into an operational whole requires
  - Sufficient breadth of organizational knowledge and
  - Authority to make decisions and resolve conflicts
Findings of the IGI CIGO Task Force

- There are three major “gaps” in how we handle information
  - Coordinating
  - Balancing
  - Handling content decisions

1. **Coordinating**
   - Current information structure is “fractured” (silooed)
   - To the extent that there is coordination it is hap-hazard, incidental, not maximized
   - *Coordinating and facilitating the organization’s decisions to maximize the value and usability of its information.*

2. **Balancing**
   - Balance and prioritize its interests in information risk and value.

3. **Content-focused role**
   - Top level leadership role in this area is missing
   - Compare CIO/CTO and CISO
   - Addressing content better facilitates the other information-related functions
What Does the Job Look Like?

- What is the reporting structure for the CIGO?
  - Depends on the organization & maturity of IG Program
  - Relationship to the CIO/CTO, CISO, CDO, etc.
- What are a CIGO’s daily activities and responsibilities?
  - IG Program Maturity Level Framework
Level 1: Nascent, Foundation Building

At this level, the CIGO role would not be a standalone position. It would sit within one of the other facets of IG and be “shepherded” through its development (see discussion above). The CIGO’s primary role would be building a solid foundation for IG. The CIGO would:

- Identify missing or underdeveloped key facets of IG and begin building out or developing these roles.
- Begin building alliances and working relationships between the facets of IG and coordinating projects across facets.
- Create an informal working group, leveraging emerging alliances.
- Review and revise existing policies and procedures, expanding them, incrementally, to cover more types of information and more uses.
- Assess current IT infrastructure, including understanding where and how information is being stored and determining the specific needs of the organization to know what technological solutions would add value.
- Develop an employee education program on existing policies and procedures and IG.
- Begin building known risks into standard policies and procedures, where possible, to routinize response to them.
Level 2: Framework and Structure

At this level, the CIGO role would likely still be closely tied to one of the other facets of IG. However, the CIGO would be emerging as a separate and distinct function. The CIGO’s primary role would be building the framework and structure of an effective IG program. The CIGO would:

- Continue to shore up existing facets and build out any that are missing to create a comprehensive approach to information and begin assuming a leadership role with respect to primarily content-focused facets of IG.
- Leverage existing alliances to get IG issues considered from the very beginning of projects. Facilitate the inclusion of other necessary facets in the planning process to encourage active coordination across information-related activities.
- Lead the existing IG body. Ensure that all facets are represented. Encourage regular and frequent meetings where the various facets can actively plan coordination on new and existing project.
- Review and revise policies and procedures to cover information regardless of format. Expand and integrate policies across the organization.
- Identify and implement technological solutions to facilitate IG policies and procedures.
- Expand educational programs on policies and procedures. Audit compliance on critical regulatory or legal requirements, and expand to audit of other information activities.
- Continue to expand the organization’s incident readiness. Ensure that all regular or anticipated events (e-discovery, investigations, employee departures, etc.) are built into processes so they are not disrupters of routine.
Level 3: Maintaining and Improving

At this level the CIGO would be a standalone entity and co-equal to other high level roles like the CIO/CTO and CISO. The CIGO’s primary role would be maintaining and improving the existing IG program with an eye toward optimizing the organization’s use of its information. The CIGO would:

- Ensure that the major facets have the resources to maintain and improve their functions. Build out minor IG facets to as appropriate to optimize the organizations use of information. Assume leadership and responsibility for content-focused facets of IG.
- Be responsible for coordinating and integrating all information-related activities, organization-wide and continuously improving on a formal plan to do so.
- Lead the organization’s formal IG governing body that meets regularly to proactively coordinating IG functions.
- Routinely review and revise policies and procedures. Streamline same to reduce burden on end-users. Automate steps where possible.
- Review and expand the use of technology as appropriate to streamline processes and to extract business value from information.
- Conduct regular, formal auditing of all policies and procedures. Automate auditing functions as possible.
- Maintain and improve the organization’s incident readiness. Expand focus on value-generating processes.
Taking Action

- Socialize this idea at your organization - we will be publishing a sample job description soon, and in June a CIGO Playbook
- Is this a target for your career? If so, what are the next steps?
- Join one of our Task Forces
  - (ann.snyder@iginitiative.com)
- And our community
  - Iginitiative.com/community
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