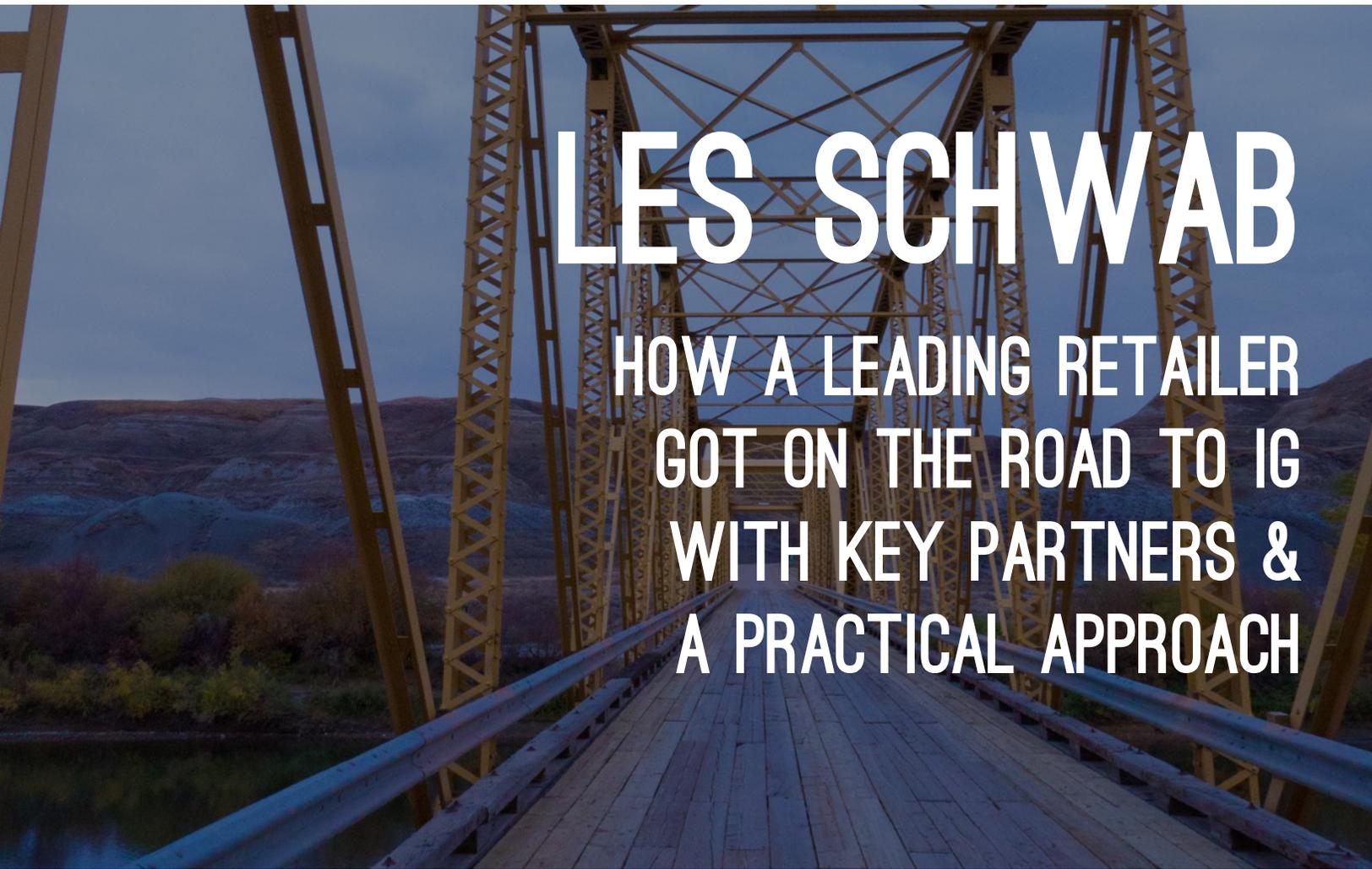


Information Governance at Work

An IGI Case Study Series



LES SCHWAB

HOW A LEADING RETAILER
GOT ON THE ROAD TO IG
WITH KEY PARTNERS &
A PRACTICAL APPROACH



COMPLIMENTS OF



About the Information Governance Initiative

The [Information Governance Initiative \(IGI\)](#) is a cross-disciplinary consortium and think tank dedicated to advancing the adoption of Information Governance practices and technologies through research, publishing, advocacy and peer-to-peer networking. The IGI publishes research, benchmarking surveys, and guidance for practitioners that is freely available on its website. Join the [IGI Community](#), a place for practitioners from all facets of IG to come together and learn from each other. The IGI was founded by recognized leaders in the field of Information Governance, and is supported by leading providers of Information Governance products and services.

About This Publication

This publication was written by the Information Governance Initiative as part of our ongoing series exploring issues, strategies, and techniques related to information governance.

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Introduction

As part of the IGI's ongoing work to help professionalize and promote information governance (IG) we have the opportunity to see how hundreds of different organizations approach IG. Although every organization's IG challenge is unique there are actually more similarities than differences in IG problems and their solutions.

By looking at one organization's experience with IG in detail, we can learn valuable lessons and gain practical insights that will help all IG professionals mature their IG programs.

This case study reveals a typical but complex IG problem: managing the relationships among key IG players, including:

1. **Outside law firms** that play a central role in approving, blocking, and/or advising on key IG decisions (like information retention and preservation).
2. **IG technology vendors** that supply the necessary capabilities to understand and take action on your information.
3. **IT departments** that actually have their hands on the dials and levers of the systems that house and control your information.
4. **Business stakeholders** like department heads who will be directly affected by the policy and technology choices you make.
5. **Risk-focused departments** like legal and audit that own key IG decisions.

IG projects require tight alignment and coordination amongst these groups. However, given that these groups often have differing levels of interest, expertise, and even competing goals, this dynamic often derails otherwise well-designed and executed initiatives.

The key to navigating this dynamic is establishing clarity about the role of each stakeholder – especially about each player's mandate and level of authority. Again and again we see nobody taking IG decision-making authority unless it is clearly given to him or her – often simply out of a desire to avoid conflict and to get along with colleagues. Given the relative immaturity of IG, the owner of this authority is often unclear.

As we will see in this case study, Les Schwab found a way to work closely with these stakeholders, and in particular establish a close and fruitful relationship with an outside law firm that not only accelerated its project, but also helped to increase its positive impact on the organization.



Traveling a Familiar IG Road

The Information Environment at Les Schwab

Les Schwab is one of the nation's oldest and largest retailers and distributors of tires and related automobile parts. From its founding in 1952, the Bend, Oregon company has grown to 7000 employees serving customers in more than 450 locations across the western U.S.

Les Schwab had a familiar IG problem.

While the company had a good handle on its physical information, its records retention schedule (RRS) did not address digital information – the form in which the bulk of the company's most valuable information was now found.

On top of that, the volume of digital information requiring governance was growing rapidly and had recently passed the 5 terabyte (TB) mark in the shared drive environment alone. The departmental shared drives (i.e., those shared by members of a group as opposed to network file shares assigned to individuals) had over 500 top-level folders, and thousands of additional subfolders. In addition, like many organizations, Les Schwab was getting ready to move to the cloud for collaboration and document creation, and wanted to ensure that this migration was done efficiently and intelligently.

A headquarters office move in 2008 had provided the impetus for Les Schwab to mature its approach to paper records management, but Les Schwab realized that the RRS – and indeed the company's approach to IG itself – needed to catch up to the company's rapid growth and maturity.

Picking Partners for the IG Journey

The success of any trip depends in large part on your traveling companions. This is equally true for the IG journey, where picking the right partners can make or break an IG project.

The Les Schwab team knew they would need expertise in two fundamental areas. First, they needed legal and IG expertise to help them move forward in a legally defensible way as they updated their IG rules. Second, they needed a technology partner who could give them the capability to get clear insight into their data, and then apply that insight in the form of migration, classification, deletion and other essential IG activities.

"We went out and looked for tools that would give us clear insight into our information environment. That's how we ended up selecting and using Active Navigation."

*- Neil Cole,
Director of Legal Services,
Les Schwab*



So, Les Schwab selected the IG team at Drinker Biddle & Reath (DBR) a law firm with deep expertise in e-discovery, records management and other areas of IG. Then, after evaluating several software companies and their tools, they chose Active Navigation as their technology partner. One of the benefits of their approach is that DBR and Active Navigation had worked together on joint projects before, and the familiarity with each other's capabilities and teams made for a faster project start and smoother project management.

Aligning IG Maturity with Business Maturity

The first IG problem the Les Schwab team tackled was remaking the company's outdated RRS. Put simply, like most RRSs today, it was not fit for purpose in the digital world. Among other things, it was too complex, had too many categories, and could not be practically implemented in the digital realm. Employees understandably saw it as having little application to their daily digital footprint.

So with the help of Bennett B. Borden, Chair of DBR's IG practice and the firm's Chief Data Scientist, Les Schwab set out to change that.

"We had to stop approaching IG as some sort of legal risk issue. Because no one cares about that especially if they have not felt the pain of a big high profile case. So we had to come up with something that mattered to the executive level management group. For us, that was positioning IG as part of our cybersecurity responsibilities, especially given the many high-profile attacks on retailers."

*- Neil Cole,
Director of Legal Services,
Les Schwab*

1. Conducting Interviews

The team conducted 22 interviews with 37 business stakeholders to learn about their IG needs and patterns. This was necessary to ensure that the new RRS would fit the needs of the business, and thus actually be used by Les Schwab employees.

2. Looking At The Data

The team used scans generated by Active Navigation's Discovery Center software to supplement the interview data. Among other things, this insight revealed that *43% of the data had not been touched in five years*. At any organization this is a strong indication that this information has little value to anyone. In addition, the team identified *1.7 million files* that were obviously "redundant, trivial, or outdated" (often referred to in the IG industry as "ROT").



3. Looking At Actual Usage Patterns

The IG team then used insight from Active Navigation to learn where and how employees actually stored and organized their information – again, to ensure that the new approach would fit with the way employees actually worked, as opposed to forcing them to do something radically different (an approach guaranteed to fail).

4. Remaking The RRS

Based on this insight the team reduced the number of categories in the RRS from 114 to 36. DBR also removed event-based retention periods that were unrelated to legal or regulatory requirements. In addition, based on employee interviews about the average life of a project, DBR converted as many event-based triggers into fixed retention periods by adding retention time as necessary (where there was not a specific legal or regulatory requirement). Removing event-based triggers allows for technology-driven remediation techniques that are not possible otherwise.

“We have this concept we call ‘build it together.’ Coming in like you know everything and dictating how things are going to be simply fails. Here we engaged key people to build the solution with us. It was exciting to see them get excited and engage in thinking through IG solutions.”

- Bennett B. Borden,
Chair of IG Practice &
Chief Data Scientist, DBR

5. Simplifying The “Record” Concept

For decades organizations have expected employees to somehow figure out – dozens or hundreds of times a day – what kind of thing the information in front of them is, and to also make a consequential and complex legal and business decision about whether a piece of information is a “record” or “non-record,” and thus merits special attention.

It is a fantasy. It does not work. This is why DBR advised Les Schwab to drop the distinction between “record” and “non-record” entirely, and instead focus employees on what they know best, i.e., the role the information plays in the business. This approach was implemented in the new RRS and throughout the IG program at Les Schwab.

6. Putting The New RRS to Work

Les Schwab next plans to implement the new RRS in the shared drive and collaboration environment. They are working on a simplified file plan with categories that map to the 12 major business functions identified in the RRS. Within each of these categories, there will be a handful of subcategories (represented by subfolders), each also aligned to the new RRS. For example, the accounting department would have three subfolder categories and marketing would have four. Within that structure, employees will be free to create subfolder categories that support their working style and needs, giving them the freedom and flexibility they need while keeping information practically governed.



Accelerating IG Through Data Remediation

Preparing to Remediate

Once Les Schwab established the new rules of the road through the development and implementation of the RRS (the team also updated its approach to Legal Holds), it was time to put them to work.

The company's shared drive environment contained over 5 TB of information. *Nearly half* of that information had not been accessed within *the past five years*.

Initial analysis revealed that about one-third of that information existed in private file shares (not used for collaboration), which typically have a high percentage of non-work related information. In fact, as discussed above, the team quickly identified 1.7 million files that required no further analysis to determine that they were ROT and thus could be deleted.

Knowing that the company was responsible for a high volume of private and sensitive information (e.g., personal information about its employees and customers; records generated by the financing division), the team also used Active Navigation's software to identify any files that required special handling and protection. When sensitive information was found, employees were asked about how and where they used that information. Where necessary, workflows were updated and implemented to ensure that sensitive data was used and stored securely and in accordance with best practices.

Working with the Data

Having created a complete picture of its data, and having done the hard work to get executive support, the next step was to put the new IG plan into action.

A critical step was cutting off employee's access to the information the team had identified as ROT – an approach that DBR calls, “quarantine and quack.” In this approach, access to suspected ROT is removed and the data is kept for a fixed period of time. If employees do not complain, or “quack,” then the data is defensibly deleted.

If needed, the data can also be recovered, but, “if we have done our jobs well, this rarely happens,” according to Borden. “This is a softer approach that makes it much easier to get users on board while keeping the project moving forward,” says Borden.

“If we're going to have any kind of information governance program, we have to actually know what we have, where it's at and what it looks like.”

*- Neil Cole,
Director of Legal Services,
Les Schwab*



The team also remediated information related to users no longer with the company. When Active Navigation identified an “unresolved user,” (i.e., a file created by someone no longer with the company and stored on a personal file share), DBR confirmed that the employee was no longer at the company. Based on that analysis, the data was then quarantined or deleted as appropriate.

Legal holds and regulatory holds were also critical for Les Schwab. The legal department updated their approach to preserving digital information required in the context of litigation, audits, and investigations so they could move and delete data without concerns about downstream spoliation or other negative legal consequences.

With DBR’s guidance and the power of Active Navigation’s software, Les Schwab was able to quickly get rid of about 2 TB of ROT – about 40 percent of the total shared drive volume.

What’s Next for Les Schwab?

Les Schwab is well on its way to a highly governed and mature information environment. ROT has been deleted or quarantined, and the IG team has identified where about 90 percent of the remaining information is going to live over the long term.

The Les Schwab team is now implementing a change management plan to move all of the unstructured data into the right categories in a way that keeps employees happy and productive. To this end, the team plans to show employees where and how information would be stored under the new IG program and how employees can easily consolidate their information into the new categories.

Although the initial IG focus was file shares, up next for the Les Schwab team is steering the company through a move to cloud-based collaboration and storage provided by Google G Suite, with the goal of phasing out network file shares entirely.



IG Lessons Learned

We can all learn vital IG lessons from Les Schwab and their IG partners. Although the scale and complexity of IG varies by company size, the fundamentals do not. Here are three key lessons we can learn from this case study.

One: Manage Your IG Stakeholders

Successfully managing the politics and performance of IG stakeholders was a key to IG progress at Les Schwab. This case study demonstrates the benefits of choosing IG partners carefully, selecting for experience, credibility, and a proven record of successful projects. At the same time, the Les Schwab IG team addressed the concerns of executive stakeholders by working closely with business and legal leaders, while progressively zeroing in on (and formalizing) IG roles and responsibilities.

Two: Information Transparency Leads To IG Motion

Like most organizations, Les Schwab was initially uncertain about how to take control of digital information. However, instead of being paralyzed by complexity, the company realized that getting visibility into their information would allow them to provide real facts and insight that they could use to build executive support for IG action. This strategy worked and the company was able to move forward not only with a large remediation project, but also with a holistic update to the IG program.

Three: Practicality Drives Progress

Although admonitions to keep things simple (e.g., “don’t try to boil the ocean”) are common in the IG profession, this case study shows what can happen when such admonitions are actually put into practice. Pragmatism and integrity are highly valued at Les Schwab, and those values are reflected in their approach to IG.

A remediation project like the one Les Schwab tackled is not easy, requiring an organization to navigate several concerns and limitations, such as:

- fears of legal consequences if we throw the wrong thing away
- fears of keeping something that could undermine our company’s future legal or business position;
- the complex and varying needs of our actual employees; and,
- overall project cost, complexity, and time.

The Les Schwab team took a pragmatic and measured approach that was supported by partners who had been through this process many times before. They focused first on the problems they could solve, which allowed them to build momentum and support for



solving more difficult and complex IG problems. Finally, they intelligently used an upcoming IT transformation (moving to the cloud) as a way to drive IG change.

These three lessons are IG fundamentals. All organizations regardless of their size, complexity, or maturity will benefit from putting these insights to work as they drive their IG programs forward.

