

Information Governance Initiative

IG SNAPSHOTS

What We Learned by Looking at Five Organizations' Information Governance Programs



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SERIES INTRODUCTION

What We Learned By Looking At Five Organizations' Information Governance Programs

The Information Governance Initiative and its Supporters like OpenText (winner of our Supporter of the Year Award in 2015) are always looking for new ways to drive information governance (IG) forward. The IG community has told us that one of the most valuable things we can do for them is simply to share stories about how IG is getting done.

This is exactly what we are trying to achieve with a new series of **IG Snapshots** based on our extensive benchmarking work. IG Snapshots tell a quick, real-world IG story and highlight the IT and management insights

illuminated by the story. The IG practitioners we highlight are at various stages of doing IG. In some cases, this just means that they have identified the cause of a major information problem and adopted IG as the solution. Sometimes, simply doing this (which is never simple) is itself revolutionary.

IG is hard. There is no way around it. Any attempt to challenge the status quo is going to be hard, and IG is no exception. But, when the status quo is widespread abdication of the duty to properly manage information assets, the status quo is unacceptable.

CHALLENGING THE STATUS QUO

Our research shows that IG is shaping management practices across multiple sectors. In fact, the average large organization undertaking IG has seven projects on the go, each costing an average of \$750,000 USD. At the same time, organizations are experiencing an unprecedented disruption in enterprise IT, driven by the cloud, consumerization, mobile, big data, and myriad other factors.

We see plenty of evidence that we are on the threshold of rapid change around IG. We see it in the stories that practitioners in our community tell us. We see it in research data showing first movers and fast followers increasing investment in IG, deepening IG maturity, and assigning senior managers to the IG portfolio.

A VISION FOR PRACTICAL GOVERNANCE OF UNSTRUCTURED INFORMATION

We share a two-part vision with OpenText about how we can solve the problem of governing unstructured information.

One: A significant percentage of all of your unstructured information is clearly the byproduct of a structured business process. As such, the governance of that information should be built into that business process in a “silent” way that requires little human intervention beyond the initial design. We think this should be a core function of ECM – bolting on and underpinning line of business applications as diverse as ERP and construction management. The beauty of this approach is that it does not require data “classification” (automated or not) in the traditional sense, because the purpose, meaning, and nature of the information is deduced from the business process that generates it. Sophisticated ECM systems are able to connect to and support IG for these line of business systems.

Two: A significant percentage of your unstructured information is not the byproduct of a structured business process and thus, cannot be governed this way. Our 25-year experiment to manage unstructured information using concepts that worked well for paper (e.g., centralized capture and control, human records clerks for classification) has failed. All unstructured information does not require the same level of governance. In fact, a clear-eyed cost/benefit analysis at most organizations would reveal that the cost of attempting to do so (and the loss of employee productivity, creativity, and collaboration that usually follows) does not justify even the theoretical, much less actual, benefit.

Instead, we recommend that organizations adopt this approach:

1. Identify as many opportunities as possible to govern information as part of the business process.



2. Identify use cases where automated or machine-assisted human classification makes sense as a tool for moving content into a managed state and maintaining it there.
3. Identify information that requires a level of document-by-document, content-based classification and governance that can only be practically accomplished by humans, and invest in the best processes for doing this.
4. Manage the rest using broad rules targeting systems, roles, business functions, work groups, geographic areas, and other factors that reveal business function and thus are instructive regarding the governance rules that must apply.

Focus on progress and pragmatism. Perfection is not the goal.

This approach enables us to take care of the big risks, deliver business value, and move on from our fundamentally unworkable reliance upon human governance and classification for unstructured information. At the IGI, we have articulated this vision in multiple ways through our research, case studies, events, and other work and will continue to do so. We are grateful to have support for these efforts from a forward-looking and pragmatic organization like OpenText.

Your story is incredibly valuable to the community, and we would love to help you tell it. As you will see in our Snapshots, we make every effort to protect the confidentiality and anonymity of the practitioners and organizations we profile, while trying to provide as many specifics as we can. Please contact us so we can help you tell your IG story.

In the meantime, enjoy the IG Snapshots!

Barclay T. Blair
Executive Director and Founder
Information Governance Initiative



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IG BY DESIGN

EMBED IG INTO THE BUSINESS



THE STORY

Dan, who has been running e-discovery at a very large pharmaceutical company for a decade, was recently asked to use what he has learned about e-discovery to help build a world-class IG program. The good news for Dan is that he not only has a great understanding of the company's information environment due to his e-discovery work, but that he also has deep and wide support for this initiative (both are essential). Dan is part of a legal IT department that is functionally viewed as part of the company's overall IT group.

His initial analysis revealed that less than 5% of the company's unstructured information is managed by the records management system, which is built on an ECM platform. Through his interviews with staff responsible for this program, he learned that they had been trying for many years to improve adoption through education and training without much success. He realized that they needed to try something new.

So today, Dan is going down a new path. He is focusing on using their ECM system for content that is readily identifiable as the most valuable output of well-understood and structured business processes (such as R&D and common administrative functions like accounting and HR).

As Dan describes it, he is trying to "embed" IG into the business itself by making governance an inherent part of the most important business processes. He believes that most of the company's "official records" are found in those systems, and by connecting his ECM platform to them, he avoids having to rely on humans to identify, classify, or add management metadata to the records. Dan's approach enables him to infer the nature and value of the records from the business process/system generating them, thus enabling the application of functional governance rules.

For the rest – such as the daily communications and collaborative content generated by employees – he is focusing on trying to encourage good data hygiene with simple, automated disposition processes (e.g., 30 days in email) while not strangling ideation, collaboration, and communication.

Dan expects that this approach will dramatically improve the percentage of valuable information making its way into highly governed systems. Dan is beginning to implement this approach in his company's policies, practices, and technologies.

IT INSIGHT

What can we learn from Dan about an IT strategy for IG? Here are two key insights.

1. **Define the purpose of your ECM.** It is easy for organizations to lose sight of the role of their ECM system as part of an overall IG and IT management

strategy. Is the intention really to get *all* unstructured information into ECM? Is that realistic? Dan's approach suggests that a pragmatic, embedded approach is more likely to increase user adoption and thus provide greater value to the organization.

2. **Target key business applications.** What are the core applications, platforms, and systems that make your organization tick? These are the places where much of the most important unstructured information is being generated. By connecting ECM to these systems, you can leverage the value of your investment while improving governance. This is a key part of Dan's strategy, and it can work for you, too.

MANAGEMENT INSIGHT

What can we learn from Dan about a management strategy for IG? There are three key insights.

1. **Use what you know.** In Dan's case, he knows a whole lot about e-discovery. This not only gave him a deep understanding of the company's information environment (and where the company is vulnerable), but it also taught him how to get things done. E-discovery requires pragmatism. Short timelines, multiple conflicting stakeholders, and resource constraints quickly teach practitioners "completion is perfection." Dan's bias toward action and his ability to manage complex, high-stakes projects will serve him well in IG. We see many e-discovery practitioners like Dan taking on more comprehensive IG roles and bringing with them a battle-tested approach to finding, classifying, and ultimately governing unstructured information.
2. **Embed IG into the business process.** Take a business process view of your most valuable information, as opposed to a document or record series view. This will enable you to identify opportunities to capture, retain, and govern these assets as an inherent part of the business process as opposed to a human-dependent afterthought.
3. **Consider role-based rules.** One way to get practical with IG is to develop and implement employee role-based rules. As with Dan's overall approach, this requires you to understand and work closely with the business so that you can understand the core roles and job activities at your organization. Notably, the US National Archives and Records Administration (NARA) has advocated this approach for the governance of senior administrators' email in the US federal government (what it calls the "Capstone" approach). Role-based rules simplify IG and thus increase the likelihood of success by applying universal rules that do not require document-by-document classification. Role-based rules are far from perfect because they will almost always result in over-retention. But, they may be the essential step forward for your IG program.



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KEEP UP WITH YOUR EMPLOYEES (HINT: YOU ARE ALREADY BEHIND)



THE STORY

Holly is in charge of a mature and successful IG program at a large technology company. Her program began many years ago as an out-of-date records management program. Over several years, she has transformed this traditional, moribund approach into a multidimensional IG program that has changed the way information is used and managed across her entire organization. This is a remarkable achievement in a company that does not have the same cultural orientation toward risk management as more regulated entities.

But Holly knows that there are many threats to her program, including the risk of simply falling behind.

Holly's company is in the business of creating ideas and bringing them to market in a very fast-moving and competitive environment. The core activity at the company is smart people collaborating with each other. This means that Holly must avoid doing anything to add friction to those processes as part of the IG program.

As the company moves more and more of its infrastructure to the cloud, each new service adds complexity and creates new risks, particularly when many messaging, communication, and collaboration services were designed with speed and convenience in mind, not IG.

It is impossible for Holly to keep ahead of this curve, especially since the company's corporate IT and security groups have a bias toward openness and innovation. So her challenge is to operate in an environment where the cat is already out of the bag, and it is not going back in.

Holly must take an intelligent, risk and value oriented approach focused on:

1. Ensuring that governance of core information assets is driven by the process or system creating the information (e.g., structured and well-defined business applications).
2. Governing the rest with a tiered approach focused on big-picture risks like security, intellectual property protection, e-discovery, and legal and compliance requirements. This is the approach for productivity and collaboration tools like Office 365, email, and file sync-and-share applications.

Holly is currently examining several collaboration and file sync-and-share tools that can replace the consumer-grade tools that employees are currently using. Her

"We are much more about balancing the voices now—much different than a siloed approach."

—HOLLY, ASSOCIATE GENERAL COUNSEL AT A MAJOR INFORMATION TECHNOLOGY COMPANY



challenge is helping the firm make the transition in the least disruptive way. Holly is evaluating the right approach while continuing to educate and liaise with IT and the business on issues like cloud migration and shadow IT.

IT INSIGHT

What can we learn from Holly's story about the connection between IT and IG? Her story illustrates a central question for IG practitioners: *Do you really understand IT?*

Too many IG practitioners fail to understand the dynamics of IT departments and how best to work with them. Don't be surprised if IT's first reaction to new IG rules is negative, especially if the rules add unexpected complexity (and time) to a project that IT has already committed to delivering (a common situation).

You must learn to communicate that IG provides the information guidance that IT has been desperate to receive for years as well as the certainty they need to act. How so? One example: IT is often put in the impossible position of reducing infrastructure costs without the authority to make decisions about the fate of data in that infrastructure. And nobody else seems to have the authority either. However, at Holly's company, her IG program provides this authority. Holly is now viewed by IT as someone who *solves* their problems instead of someone who creates new, unsolvable problems.



MANAGEMENT INSIGHT

What can Holly's story teach us about management strategies for IG? A critical insight is the importance of not getting complacent as your IG program matures.

Even the best-built IG programs get stale as your business, the law, and technology constantly change. In addition, the needs and expectations of the people in your organization are always changing. IG provides a framework to enable them to use the latest social, collaboration, and productivity tools instead of just reflexively blocking or ignoring them simply because you have not calculated the risks versus rewards.

The markers of a high-quality program are those that incorporate a continual cycle of assessment and improvement. This need has only intensified with the rise of mobile, apps, the cloud, and the ongoing decentralization of enterprise IT. Remember, if you are using the app, or your kids are using the app, your employees are probably using it, too. What are the risks and rewards of this app? Has your organization asked and answered this question, or is it doomed to repeat the same mistakes we made with email and other transformative technologies that entered the enterprise in a complete analytical vacuum?

Be an IG leader by identifying, evaluating, and guiding the use of these technologies.

“Too many IG practitioners fail to understand the dynamics of IT departments and how best to work with them. Don't be surprised if IT's first reaction to new IG rules is negative.”



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ENGAGE WITH IT AS AN IG PARTNER



THE STORY

When Andrew, an information leader at a state Department of Health, was given responsibility for implementing ECM, he realized early on that *how and when* he engaged with IT was going to be crucial to his success.

A critical part of his efforts was undertaking an educational push for IT that helped them move from a perception that their job was merely limited to supplying the infrastructure to engaging with the problem of information itself (with Andrew's help and leadership). This realization was central to the progress of his IG program because it headed off several common problems that happen when IG leaders and IT leaders are out of sync.

For example, Andrew helped IT understand that the upcoming ECM implementation was not just another infrastructure project, but rather a project that would help IT solve an ongoing problem: how to control infrastructure costs while constantly improving their level of service to the organization. He also showed how his governance plan for ECM could reduce overall storage volumes and alleviate IT's e-discovery burden by moving more and more content from the chaos of multiple discoverable endpoints into the ECM system.

This early investment in education and partnering with IT has paid off for Andrew in the form of a faster and higher quality rollout of the ECM system and the IG program itself.

Most organizations are experiencing significant growth in unstructured information, putting IT under pressure to keep service levels high while controlling costs. Moving this information into governed environments can help IT departments by driving down the amount of useless information being unnecessarily stored, protected, provisioned, backed up, and archived.

Users must also be included in the dialogue between IT and IG leaders. Too often the needs of the user are considered last, leading to solutions that just create new problems rather than solutions.

IT INSIGHT

What can we learn from Andrew's story about IT strategy for IG? Andrew's story clearly illustrates the value of **connecting IG and IT leaders early in the process**.

IT is under more pressure than ever to deliver value to employees who are likely already using cheap or free consumer tools. Alignment between IG and IT enables IT to play a larger and more strategic role in the enterprise through close integration of IT capabilities and governance rules. Rather than the dysfunctional approach where governance issues are addressed after a system has been evaluated, installed, and configured, this approach maximizes IT value while minimizing IG risks. Effective adoption and use of IT is becoming even more critical as our rapid digital transformation threatens to leave laggards behind.



When IG and IT leaders are out of sync, there is a real danger that implementation of ECM and similar initiatives will be viewed primarily as software projects when in fact they are much more. To maximize value, the "implementation" must occur both in the IT environment *and* the human environment. In other words, if the people in the organization are not prepared for the change represented by the new application, success is unlikely.

IG leaders need to be at the table when relevant IT acquisitions are being considered and evaluated. Many organizations fail to take IG into consideration early enough in this process. This is common in Office 365 transitions, for example.

Post-facto implementation of governance concepts and rules rarely works. The most successful implementations address IG requirements in the design, architecture, configuration, rollout, and training.

MANAGEMENT INSIGHT

A management technique that was essential to Andrew's success was his ability to **get practical**.

Writing high-level IG policies and throwing them at IT is not helpful. While policies are essential, what IT really needs is practical guidelines and checklists that help with key decisions. Put high-level IG standards in place for any IT system that creates or stores unstructured information. Write these standards in a way that is familiar to IT. Key Performance Indicators (KPIs) are useful here, as are simple evaluative tools like checklists.

On the next page is an excerpt of a provisioning and decommissioning checklist used by an IG practitioner in our community to guide their IT department. Tools like these are useful even if you do not have the authority to issue them with the force of policy.

"We showed IT a slideshow that explained that information was not just IT's problem. That resonated with them."

—ANDREW, INFORMATION LEADER AT A STATE DEPARTMENT OF HEALTH

A BASIC PROVISIONING AND DECOMMISSIONING CHECKLIST

- ☐ This system supports the requirements of our Information Security Program.
 - *Considerations. It is expected that the Information Security group will, at its own discretion, conduct an information security assessment of the system. The results of such examination should be provided to the IG Council.*
- ☐ Prior to implementation we will clearly identify, document, and provide specified information about the system to the IG Council, and ensure that such information is updated to the Council should it materially change.
 - *Considerations. Each new system should be inventoried and catalogued centrally so that, among other things, we can satisfy our legal and regulatory obligations for retention and preservation of information. Any system inventory should be treated as a living document that is updated as a standard part of any system acquisition and provisioning process. The IG Council requires a set of information sufficient to enable it to maintain an inventory of systems that contain records or otherwise contain information that is subject to an IG directive. This information includes without limitation: system owner; implementation date; expected lifecycle; the name of the system it replaces if any; the technical or standardized name for the system used by IT; the commercial name, manufacturer, and version of the system; the business unit, operation, or function the system supports; the geographic area where it will be used (if other than the entire global operation); the security classification of the information contained in the system; and so on.*
- ☐ This system will not be used for the movement of personally identifiable information (PII) across national borders – or, if it will, implementation, configuration, and use will be done in a manner that complies with our privacy directives and requirements.
 - *Considerations. The movement of PII across national (and other jurisdictional) borders must be done in a compliant way. If the system in question will be used for such purposes, it must be done in a way that satisfies our privacy procedures, which may require an evaluation by legal council.*





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QUANTIFY IG IN THE LANGUAGE OF BUSINESS



THE STORY

Dianne, an IG manager at a mid-sized bank, realized that business leaders at the bank would not care about her organization's efforts to govern their information unless it was communicated in a language that made sense to them.

The senior managers at her company with P&L responsibilities manage to the bottom line. Building support for improved governance at the bank, including a new data classification system and an ECM system, depended on her ability to speak the language of her business.

The bank is undertaking several initiatives to reduce the overall cost of its information infrastructure. To support this, Dianne developed service-level agreements setting expectations on information availability, speed, and cost. She is also developing an economic model for the bank that will calculate and pass on the cost of providing some IT capabilities to the business.

With these and other activities, Diane is working hard to build information awareness and intelligence that not only helps them prepare for the inevitable "firefight" like e-discovery and cybersecurity incidents, but also helps her organization simply be a better bank.

IT INSIGHT

Diane has worked hard to move her organization from a reactive posture to one focused on "information awareness and intelligence." She is designing her IG program to improve resilience when a crisis hits.

Dianne's approach requires:

- Investment in technologies that enable the company to **create and implement governance rules, wherever data resides**. This includes both "high touch" governance environments like ECM as well as "light touch" environments like file sync-and-share platforms.
- Technologies and techniques that support the **governance of information with minimal impact on the business**. Although Diane is in a highly regulated industry, managers at her firm are under enormous financial pressure and will resist significant obstacles to their goals. This means building IG into the business process, using smart, automated classification in some instances. It also means using governance rules that target systems, roles, and workgroups as opposed to requiring message-by-message or document-by-document classification.

Many IG practitioners mistakenly believe that data remediation decisions (e.g., keeping, deleting, or migrating information) are legal or technology decisions. But they are actually *business decisions*.

MANAGEMENT INSIGHT

A key management insight from Dianne's story is the wisdom of **focusing on what is really important when building your IG program**.

Put simply, it is not necessary to govern all information in the same way or at the same level. This is an impossible task that is bound to fail. There is a mistaken belief in IG that anything legal, compliance, or risk focused is black-and-white. We know intuitively that this is not the case, and even if it were, it would be impossible to build a workable IG program with this approach.

Instead, we must learn to identify the information that represents the greatest value or risk and focus our most intensive governance efforts there, while right-sizing our IG approach to less valuable information.

Another closely related management insight from Dianne's story is the importance of not only speaking the language of business when building support for your program, but also acting with a business orientation. What does this mean? Here is one example.

Many IG practitioners mistakenly believe that data remediation decisions (e.g., keeping, deleting, or migrating information) are *legal or technology decisions*. But they are actually *business decisions*. What is the difference, and why does it matter?

The difference is that legal analysis and technology evaluation are only part of what is required to make a remediation decision. It matters because the way we perceive remediation clearly correlates with the quality of our approach and our level of success.

A business decision is the act of:

- Gathering the best available facts
- Calculating benefits and costs
- Assessing risk

Armed with this insight and knowledge about our capabilities, goals, and values, an outcome is projected, a decision made, and a course of action set. Of course, in practice, only the most consequential business decisions are made with this level of formality. Time, budget, politics, and other factors mean that these decisions are necessarily imperfect.

Part of the reason that acting with this business mentality has been difficult in IG is that we have not incorporated the tools and techniques that enable us to quantify our choices and base our decisions on data. The good news is that this is changing thanks to a range of products that enable us to gain visibility into our information environment. These empower IG practitioners to adopt the quantification techniques of business and use economic models and decision-making methodologies that are already accepted and broadly used in other areas of their organization.



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IG SNAPSHOTS

What We Learned by Looking at Five Organizations' Information Governance Programs



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IG SNAPSHOTS

TAKING A PEOPLE-FIRST APPROACH TO IG



“When you try to implement, you get a lot of pushback from management. They think that end users are not going to like the extra work.”

—INGRID, INFORMATION MANAGEMENT ADVISOR AT A MAJOR INSURANCE COMPANY

THE STORY

A major insurance company with an IG budget of several million dollars had spent years struggling to improve management of its information environment without much success.

Ingrid, who was asked to diagnose and fix this lack of progress, realized that the organization **was operating on some fundamentally incorrect assumptions, including:**

1. We need complete, perfect implementation of our records retention schedule (RRS) across the entire information environment.
2. The company’s records and information management goals and the goals of our employees are the same.
3. All information has to be managed with the same level of rigor.

Ingrid decided to use the occasion of an ECM rollout as an opportunity to adopt a people-first IG mindset. She wanted to challenge her organization’s assumptions and focus on incremental improvements that were at once achievable and consequential.

Let’s find out how a people-first approach to IG helps.

MANAGEMENT INSIGHT

Challenging Incorrect Assumption #1: *Do we really need complete, perfect implementation of our records retention schedule (RRS) across the entire information environment?*

Good IG actually takes a “horses for courses” approach (i.e., different racetracks suit different horses, just like different governance tactics fit different kinds of information). This approach has a bias toward action and forward momentum. In other words, perfection is impossible and shooting for it has a predictable result: failure.

This practical philosophy enables new approaches to records retention schedule (RRS) implementation and enforcement. All information does not need to be classified and retained at the document level. Much of it can be managed on a system-, role-, project-, or workgroup-level (i.e., a level that is more easily implemented and enforced). A perfect RRS that is impossible to implement and enforce can do more harm

than good by setting an objective standard that your organization will fail to meet (not a fun scenario when a judge or regulator examines the gap between what you say and do).

Challenging Incorrect Assumption #2: *Are the company’s records and information management goals and the goals of our employees really the same?*

Does requiring employees to classify email and documents according to *your* categories provide value to them? Do they know or even care about a “functional records taxonomy?” Does requiring four extra steps to save a document do anything helpful for them or their productivity? In most cases, the answer to these questions is a resounding no. Blindly assuming this only makes implementation, enforcement, and compliance difficult and often leads to outright failure. You must balance the organization’s needs with the user’s needs. It is achievable.

Challenging Incorrect Assumption #3: *Does all information have to be managed with the same level of rigor?*

IG provides a framework for balancing information risk and reward. The amount of time, money, and effort put into governing any information should be commensurate with its relative value and risk. Although this sounds obvious, it is espoused and practiced by few. This needs to change.

IT INSIGHT

What does Ingrid’s story teach us about our IT strategy for IG? Here are three key insights.

1. **Focus on User-Centered Design.** Too many enterprise projects fail to take this approach and seem to operate on the assumption that the people writing the checks and the people using a system want the same things. Sometimes that’s true, but it should not be assumed. Many IG software implementations fail because we spent too much time on what “the organization” wants and not enough time on what the people want. Although this is not a problem unique to IG, it’s especially pronounced when risk mitigation moves front and center to the exclusion of business considerations (as it does with many IG projects).
2. **Be opportunistic.** Successful IG practitioners are opportunistic. What does this mean? It means taking advantage of projects happening in the organization now to improve IG. For example, whenever data is being migrated, there is an opportunity to capture existing budget to provide IG value through clean up, organization, and deletion.
3. **Acknowledge and evaluate what is *really* happening in your information environment.** New technology can be incredibly disruptive. By some measures, the world’s largest hotel company (Airbnb) and the world’s largest taxi company (Uber) own neither hotels nor taxis. The people responsible

for regulating those markets could not easily foresee or prevent the radical change wrought by these new IT-driven business models. The popularity of those services makes retroactive regulation much more difficult (or perhaps as time will tell, impossible).

IT in the enterprise is no different. One of our benchmarked companies was recently informed by the vendor of a consumer-oriented collaboration service that over 7,000 of the company's employees were already using the service. After the color came back into their shocked faces, the company realized that simply shutting down the service would be difficult,

ill-advised, and a major drain on productivity. The service was obviously filling a need – even if it was filling it poorly and in contravention of carefully designed IG rules. In fact, this service represented a major source of unmeasured and unaddressed risk. The company was forced to go through a difficult harm reduction process that would have been much easier and less expensive had they been paying attention to their own information environment. Learn from their example and be proactive. A forward-thinking, people-centered IG strategy will provide precisely the framework you need for this.





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