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Records management in the cloud: a multidimensional issue

Apr 28, 2015

Judith Lamont, Ph.D.

This article appears in the issue **May 2015, [Volume 24, Issue 5]**



More information than ever is being stored in the cloud, with the increasing use of cloud-based e-mail, content from mobile devices that have limited storage capacity and the continual accumulation of digital data in general. Competition among cloud storage providers for customers is intense, as evidenced by **Microsoft's** promise last year of unlimited low-cost cloud storage. But as information accumulates, what happens when a file in the cloud needs to be classified and managed as a record? The answer is not simple.

The applications that first brought file sharing into the cloud had little or no records management capability; conversely, the rich-featured enterprise content management (ECM) and records management (RM) software products were not configured for cloud architectures. However, the advantages of cloud storage will drive its expanding use and the need for records management in that environment.

Different models for cloud storage create different scenarios for records management. "The biggest area for managing cloud content is e-mail from **Google** or Microsoft Exchange Online," says Stephen Ludlow, director of enterprise product marketing at **OpenText**. "This content originates in the cloud but is brought back to an on-premise repository for records management."

Another option is for a hosted cloud solution, in which case the content and the records management function are both in the cloud. Finally, with a hybrid solution, the records management software remains on premise, while content can be either in the cloud or on premise.

OpenText was an early entrant in managing cloud content, introducing a records management software product for Microsoft's Azure cloud in 2008. "Records that are accessed frequently can be kept on premise," says Ludlow, "and then if a record has not been accessed for two years, it can be passed over to Azure, where storage is cheaper." The metadata management and search functions stay on premise, while the files are stored in the cloud.

SharePoint RM options

SharePoint and SharePoint Online have some records management capability, but the features are limited. Companies such as **Gimmel** and **Collabware** offer third-party extensions that allow full records management capability including auto-declaration and auto-classification.

"A tremendous amount of SharePoint data is going to the cloud," says Scott McVeigh, director of information governance and compliance at **Paragon Solutions**, a consulting and systems integration firm. "But in many companies, records management is an afterthought. We work with companies on developing policies, as well as training on awareness and implementation of records management."

Records365 from **RecordPoint** is a cloud-compliant records management solution built for Office 365. "Records365 is a SaaS product, so organizations simply sign up for the service and configure their rules and policies," says Anthony Woodward, CTO of RecordPoint. Records365 provides features that seamlessly control and automate records management for Office 365, One Drive and other shared networks. "The Records365 rules engine uses data in Office 365 to understand the records context," Woodward says, "and matches this data with compliance policies to automate records classification." The rules can be located either in the cloud or on premise.

In addition, RecordPoint offers a traditional records management solution, also called RecordPoint, for on-premise or hybrid environments of SharePoint. The enterprise solution extends the native records management capabilities of SharePoint. RecordPoint plans to release its Connector Suite this year for both RecordPoint software and Records365. The offering will enable records management of repositories beyond SharePoint and Office 365, including unstructured content from social media applications such as **Facebook**, **Twitter** and **Yammer**.

RecordPoint's software products can manage information that originates at endpoints such as mobile devices and can extract information for e-discovery if needed. "We are now bringing on our first customers on top of Microsoft Azure," says Woodward, "which has been a smooth transition because of our tight integration with Microsoft's products."

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Multichannel cloud records

Often, e-mail and mailbox repositories are the first type of content to move to the cloud and have the associated records management function take place in the cloud. "From a total cost perspective, e-mail does not need to be stored on premise anymore," says Scott Whitney, VP of product management at **Actiance**. "The information started out in the cloud and can stay there, but needs to be in compliance with recordkeeping policies, and it needs to have an index and a single user interface for managing the records."

Actiance offers an archiving product called Alcatraz, along with Vantage and Socialite, which are policy executors that manage communications. Vantage and Socialite provide a record of unified communications and public social media communications respectively. "Any business-critical content can constitute a record," says Whitney. "People are having conversations across multiple channels and are making decisions about the business, whether it is to give a customer a discount or change the architecture of its computer system. Along the way, they may jump communication channels. Because these decisions may be documented in a variety of ways, including via an e-mail, an instant message or a telephone conversation, enterprises need a single view of these events to declare and manage their records."

Because it is not realistic to expect people to categorize and proactively save their social media messages, such as IMs, Alcatraz automatically captures and classifies those messages in context. "A key point is that the records management system should be able to keep track of content in all channels," Whitney says, "because all channels can be used to create business records. If you only capture e-mail, you might be missing half of the conversation."

Challenges with retrieval

Some of the concerns about use of the cloud for storing records center around retrieval. "It is easy to put information up in the cloud," says Jason R. Baron, a lawyer in the information governance and e-discovery group at **Drinker, Biddle & Reath** and former director of litigation for the **National Archives and Records Administration**. "However, it is not always so easy to get the data back when you need it in a hurry or in a certain form. There can be some serious issues with extraction."

Companies in regulated industries tend to use a private cloud or go to a hybrid model. "Marketing and sales data are often put in the cloud, but sensitive, regulated information is usually kept on premise," says McVeigh. That approach helps address the issue of retrieval. "In some cases," he continues, "it is not only a security issue but also a service level issue. Companies might be concerned about how long it would take to get e-discovery results. A smaller company that is competing with a larger one for time from the cloud provider still has to meet its e-discovery burdens."

The problem becomes more extreme in cases of very large quantities of data. In those cases, retrieving the information for e-discovery or analytics may become very cumbersome. "When moderate amounts of data are involved, cloud is the clear winner, as it is for small- to medium-sized businesses," says Kon Leong, CEO of **ZL Technologies**. "However, when cloud storage goes to extremely high volumes, it may actually be more cost-effective to return the records to on-premise storage, especially if there are expectations of frequent e-discovery or high-volume analytics."

Beyond compliance

Many companies find they can use their records for purposes that go beyond compliance, including using the records for analytics. Having extensive storage capacity in the cloud offers the opportunity to keep larger volumes of data for longer than is required, which makes it available for other purposes. That decision comes with several downsides, including having to produce it for e-discovery and having to manage more data, but the results may still prove worthwhile.

"We see companies using records management for strategic and operational purposes every day," says McVeigh. "RM is the mortar between big data, analytics, legal and IT. Life sciences can use information from lab notebooks and SharePoint team sites to unlock opportunities for new drug development." Once information is organized, insurance companies, for example, can more easily mine their actuarial data. "The more companies mine their records, the better they know their own business," McVeigh says.

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Planning ahead

The key to success lies in planning ahead. "With the advent of Cloud First as a federal mandate, agencies are obligated to consider cloud storage as an option," says Baron. "Many agencies have jumped to cloud deployment, but few agencies have jumped to it thinking of how to meet their ongoing records management obligations." Retrofitting records management into a cloud environment is difficult; therefore, anticipating potential issues and designing a system that addresses them is critical. Having a point solution that allows selective retrieval is one ingredient for success.

"Frequently, companies miss the part about gathering requirements and thinking through whether the cloud is a better way to work," McVeigh says. "At first it sounds good to get the cost-savings and flexibility offered by the cloud, but later, RM managers start asking how they manage retention in the cloud, how they can respond for e-discovery in the cloud and how to ensure privacy."

A decision to use a cloud environment involves a complex mix of factors. "For a successful records management initiative in the cloud, the business first needs to understand its own objectives," says Leong. "Cost shouldn't be the only concern. Data security, intended time horizon of management and future leverage of data are all critical considerations that need to be evaluated before deciding to go with a cloud-based environment."

Many of the earlier concerns with cloud technology have abated, in particular, those related to security. Organizations are in large part convinced that cloud providers will do at least as good a job with security as they can do themselves, if not better. The high-profile breaches in the last year or two did not originate in the cloud. Some concerns remain in terms of the geographic location of cloud storage, because of data sovereignty. However, the cloud is a viable option for data storage, so it will need to become viable for records management as well.

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“Capstone” approach to e-mail eases move to the cloud

In a bulletin issued by the **National Archives and Records Administration** (NARA) in August 2013, government agencies were given the option of classifying e-mails as records depending on the role of the author rather than on the contents of the message. Each agency decides which roles or level of employee will determine whether an e-mail is a record. That approach, called Capstone, removes the burden from each author of determining whether an e-mail constitutes a record. In addition, the policy specifies requirements for using personal (non-agency) communication tools when conducting agency business.



The policy helps make it feasible for agencies to comply with the **White House** mandate that e-mail be managed electronically by Dec. 31, 2016, by simplifying decisions related to records declaration. Records declaration is automated, which is a boon to agencies that are already facing the challenges of a transition to the cloud.

Some agencies have found e-mail management to be such a challenge that they ended up using the e-mail client software as an archive rather than moving the messages to a system with retention and metadata management. NARA successfully went to a cloud implementation for its own e-mail in **Google Apps** in the space of six months, and uses **ZL Technologies'** United Archive, a cloud-based message storage and electronic records management solution, for records management. As the government gains more experience, knowledge can be shared, and the transition process should become smoother.

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