

# SMART TECHNOLOGY: GOVERNMENT & BUSINESS MEET INFORMATION GOVERNANCE (IG), RECORDS AND INFORMATION MANAGEMENT (RIM) AND PRIVACY

**Susan Goodman, FAI, MLS, IGP, CRM,  
CIPP/US, CIPM, CIP, ERMS, ECMS  
CEO, Infoflo Consulting LLC  
[susangoodman@infofloconsulting.com](mailto:susangoodman@infofloconsulting.com)**

**April 24, 2018**

**DENVER ARMA SPRING  
SEMINAR 2018**



**INFOFLO**  
— CONSULTING LLC —

# LEARNING OBJECTIVES

- ▶ **Increase knowledge about Smart City and Smart Business Initiatives**
- ▶ **Explain key implications for Information Governance (IG), Records & Information Management (RIM) and Privacy**
- ▶ **Apply IG, RIM and Privacy processes to smart technology initiatives**

# WHAT ARE “SMART CITIES”

- ▶ Urban area that uses electronic data collection sensors to supply information
- ▶ Data collected from people, devices and assets
- ▶ Data is processed and analyzed to
  - ▶ Monitor and manage assets (infrastructure and systems) effectively
  - ▶ Provide enhanced services to the public
- ▶ Frameworks: Technology, Human, Institutional, Energy, Data Management

# TARGET AREAS OF “SMART” INITIATIVES

- ▶ **Transportation systems**
- ▶ **Energy/Utilities**
- ▶ **Health & Safety**
- ▶ **Water supply networks**
- ▶ **Waste management**
- ▶ **Law enforcement**
- ▶ **Information Systems**
- ▶ **Community Services**

# COLLABORATION TO DEVELOP SMART CITIES

- ▶ **Cities/City Agencies with:**
  - ▶ **Research institutions**
  - ▶ **Industries**
  - ▶ **Businesses**

# SEVERAL USE CASES

- ▶ **London's Scoot Initiative Amsterdam's Smart City Initiative**
- ▶ **Smart Dublin**
- ▶ **Columbus Ohio's Initiative**
- ▶ **Denver, Colorado**
- ▶ **Other Examples**

# WHAT ARE “SMART” BUSINESSES

## Susan's definition 😊

- ▶ **Businesses that use Communication and other Technologies and digital capabilities to optimize operations, improve products & services and/or increase competitive advantage and market share**
- ▶ **Businesses that partner with Cities to develop and operate Smart Cities**

# IMPLICATIONS FOR IG, RIM AND PRIVACY

- ▶ **Big Data & Analytics (Including PII)**
- ▶ **Interconnected Systems**
- ▶ **Potential global reach**
- ▶ **Third parties that maintain an entity's data**
- ▶ **Commercialization**



# WHY INVEST IN RIM, IG AND PRIVACY IN SMART CITY INITIATIVES

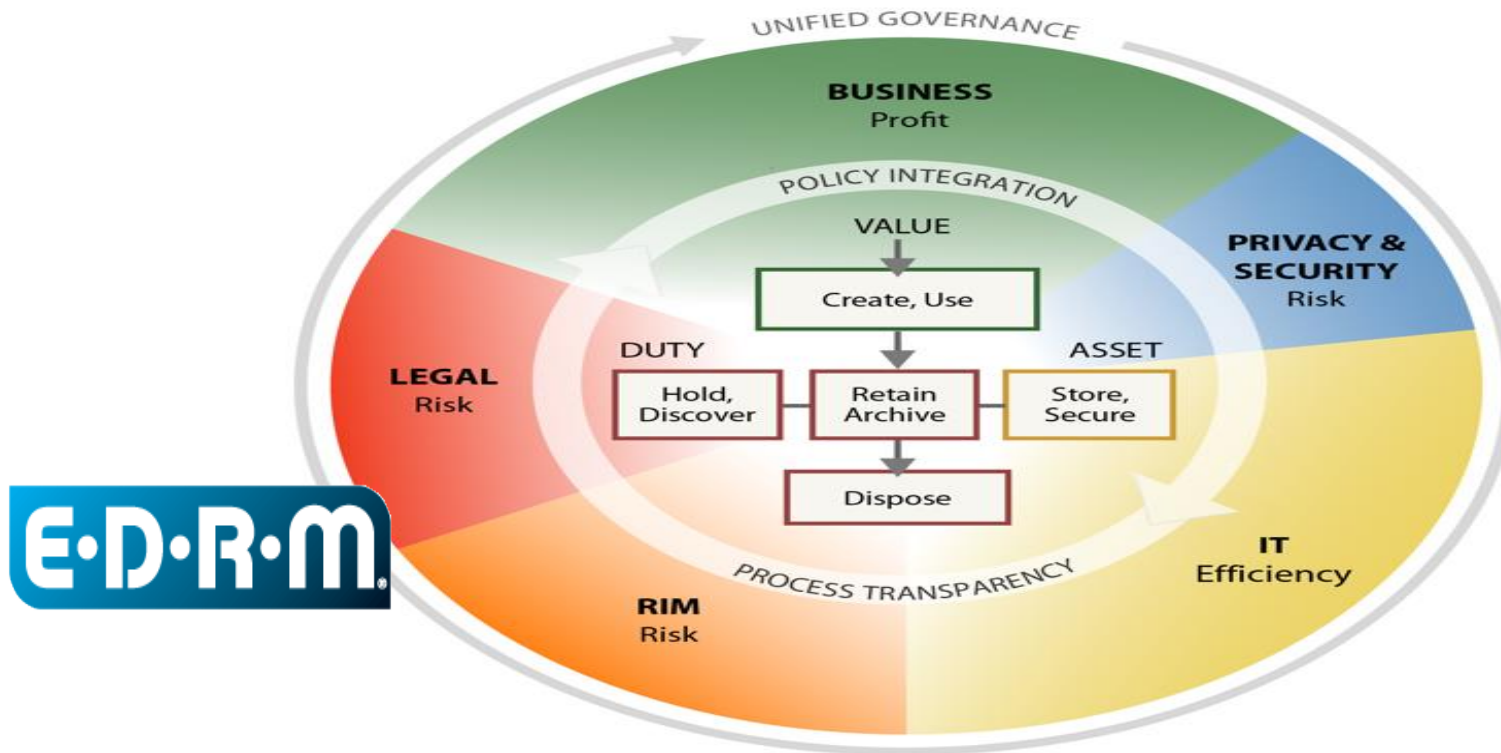
- ▶ **Security attacks & data breaches**
- ▶ **Misuse of information / Identity Theft**
- ▶ **Regulatory investigations & sanctions**
- ▶ **Lawsuits**
- ▶ **Loss of Customers and Constituents**
- ▶ **Financial loss/Impact to Company Value**
- ▶ **Damage to Reputation and Brand**

# BENEFITS OF INCORPORATING IG, RIM AND PRIVACY INTO SMART INITIATIVES

- ▶ **Compliance**
- ▶ **Trust (Customers/Constituents/Public)**
- ▶ **Cost Reduction & Avoidance**
- ▶ **Brand/Reputation Protection**
- ▶ **Competitive Advantage**
- ▶ **Enhanced Services**

# Information Governance Reference Model (IGRM)

Linking duty + value to information asset = efficient, effective management



**Duty:** Legal obligation for specific information

**Value:** Utility or business purpose of specific information

**Asset:** Specific container of information

# ALIGNING IG, RIM AND PRIVACY TO ACCOMPLISH THIS

- ▶ **IG Components are Interdependent**
- ▶ **Increasing alignment**
- ▶ **Evolving and Maturing w/in a Changing Landscape**



## *ARMA's Principles / IG*

## *Privacy Principles (e.g., GAPP)*

- |                           |   |                                 |
|---------------------------|---|---------------------------------|
| 1. Accountability         | ↔ | 1. Management                   |
| 2. Transparency           | ↔ | 2. Notice                       |
| 3. Integrity              | ↔ | 3. Quality                      |
| 4. Protection             | ↔ | 4. Security                     |
| 5. Compliance             | ↔ | 5. Disclosure to Third Parties  |
| 6. Availability           | ↔ | 6. Monitoring and Enforcement   |
| 7. Disposition            | ↔ | 7. Access                       |
| 8. Creation and Retention | ↔ | 8. Use, Retention, and Disposal |
|                           | ↔ | 9. Choice, Consent              |
|                           | ↔ | 10. Collection                  |

# SYNERGIES BETWEEN RIM AND PRIVACY

## ▶ RIM Teams:

- ▶ Create Records Inventories
- ▶ Develop and apply retention schedules
- ▶ Tag records w/requirements (including PII)
- ▶ Ensure compliant RIM (e.g., retention/disposition ) for ALL records - including PII and other sensitive information.

## ▶ Privacy Teams:

- ▶ Create Privacy inventories
- ▶ Identify and apply PII/PCI requirements
- ▶ Require disposition after agreed use has been completed and
- ▶ Ensure compliant Privacy

# ALIGNING IG, RIM AND PRIVACY

- ▶ **Communicating the synergies to all stakeholders**
- ▶ **Reviewing and integrating/cross-referencing policies, standards and procedures of the functions**
- ▶ **Tagging PII and other sensitive information in Retention Schedule and Electronic Records and Information Systems**
- ▶ **Working together to monitor/audit for compliance with information security, forward transfer (e.g., cross-border) and disposition/destruction requirements**

# IG, RIM, PRIVACY REQUIREMENTS THAT IMPACT SMART TECHNOLOGY

- ▶ **Laws & Regulations**
- ▶ **Frameworks, Principles**
- ▶ **Standards & Best Practices**
- ▶ **Litigation/E-Discovery**
- ▶ **Business Requirements**





# ASSESSING INFORMATION GOVERNANCE REQUIREMENTS

- ▶ All IG functional IG units are represented in smart technology acquisition and use
  - ▶ Legal, IT, Privacy/Security, RIM, the Business
- ▶ Additional stakeholders are involved as applicable
- ▶ There is adherence to IG best practices

# ASSESSING RIM REQUIREMENTS

- ▶ **RIM PROGRAM LEVEL**
- ▶ **All RIM Program elements are in place**
- ▶ **BUSINESS PROGRAM/PROJECT/TECHNOLOGY LEVEL**

**Note: Can be combined with Privacy & Information Security Assessment**

# ASSESSING PRIVACY REQUIREMENTS

## PRIVACY PROGRAM LEVEL:

- ▶ AICPA Privacy Maturity Model

## BUSINESS PROGRAM/PROJECT/TECHNOLOGY LEVEL

- ▶ Privacy Threshold Analysis
- ▶ Privacy Impact Assessment
- ▶ Can be combined with Information Security Assessment

# POTENTIAL MODIFICATIONS

Examples of modifications that may be needed:

- ▶ Reducing PII collected and transferred
- ▶ Ensuring that 3rd party contracts and SOWs are adequate
- ▶ Increasing/decreasing persons/departments with access
- ▶ Determining level of consent that is possible/needed
- ▶ Developing process for individuals to request info about data collected about them
- ▶ Determining retention period(s)
- ▶ Developing process for required disposition

# INTERNAL COMMUNICATION & TRAINING

- ▶ **Develop an Intranet site for the IG, RIM & Privacy Programs**
- ▶ **Make Policies and Procedures available to all stakeholders**
- ▶ **Align with other IG functions to coordinate processes**
- ▶ **Provide additional communication, procedures, etc. to departments responsible for PII with clear instructions**
- ▶ **Conduct staff training**
- ▶ **Use a Change management approach:**
  - ▶ **Continuous approach**
  - ▶ **Clear concise message**
  - ▶ **Builds on increasing awareness**

# EXTERNAL COMMUNICATION

- ▶ **Issue Privacy Notice and related communication (e.g., on web-site, mobile apps)**
- ▶ **Ensure that all requirements are included in 3<sup>rd</sup> party contracts**
- ▶ **Establish relationships with external stakeholders**
- ▶ **Benchmark/confer with peer organizations/firms**

# FURTHER REDUCING RISK

- ▶ **Close Gaps, Track and Monitor Compliance**
  - ▶ Work with departments to close gaps and mitigate risk
  - ▶ Work with Information Security, Risk to ensure that RIM & Privacy Program requirements are included in systems/processes
  - ▶ Monitor Compliance
  - ▶ Assess residual or new risk
  - ▶ Track information disclosure in database
  - ▶ Track complaints and complaint resolution

# CONTINUALLY IMPROVE PROCESSES

- ▶ **Identify needed improvements as resulting from:**
  - ▶ **Ongoing Monitoring**
  - ▶ **Data breach / incident issues**
  - ▶ **Audit / compliance failures**
  - ▶ **Changes in information lifecycle**
  - ▶ **New or updated requirements**



**SUSAN GOODMAN, FAI, MLS, IGP, CRM,  
CIPP/US, CIPM, CIP, ERMS, ECMS**

**CEO, Infoflo Consulting LLC**

**[susangoodman@infofloconsulting.com](mailto:susangoodman@infofloconsulting.com)**

**April 24, 2018**

**DENVER ARMA SPRING  
SEMINAR 2018**



**INFOFLO**  
— CONSULTING LLC —