

Who we are

A boutique compliance-inspired services firm helping organizations in their digital transformation journey



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Balancing Access and Privacy in Your Organization with the Help of Microsoft 365

www.gravityunion.com



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ECM Consultant

- ✓ 10+ years of records management experience
- Masters of Library and Information Studies, The University of British Columbia
- Deep federal, provincial, municipal, and regulatory government experience
- Has worked closely with
 - City of West Kelowna
 - BC Liquor Distribution Branch
 - BC Oil & Gas Commission
 - Liquor Control Board of Ontario
 - Public Works and Government Services
 - City of White Rock
 - JAE Oregon





Lian Furlong

ECM Consultant

- 7+ years experience in records management, policy development, and adult-oriented instruction
- Master in Library and Information Studies, and Master of Arts in English, The University of British Columbia
- Has worked closely with:
 - Township of Langley
 - City of West Kelowna
 - City of Beaumont
 - City of Winnipeg
 - Norfolk County
 - Central Bank Counterfeit Deterrence Group
 - Cameco
 - Liquor Control Board of Ontario



Preventing-unauthorized collection guse rand disclosure of personal information ACCESS it to the formation of the second disclosed only on a need-to-Ensuring personal information is used and disclosed only on a need-toknow basis for performing duties, and stored securely ostering and supporting collaboration Implementing and monitoring compliance with privacy and security Aceasuses for systemic access barriers and inequities

Promptly disposing of personal information when retention requirements enganizational culture of accountability



Access to Information Protection of Privacy



Blockers to Balancing Duties

- Need to Know mentality Causes siloing of information, duplication of effort, and increases effort in responding to Access to Information Requests
- Misplaced understanding of ownership over the content and privacy requirements: "This is mine mentality"
- Unmanaged proliferation of ROT/convenience copies
- Records managers and privacy professionals not consulted or given input into design of content management solution solutions
- Limited insight for RIM staff into sensitive information use/storage
- Using the right tools for the job
- Creating a content management solution centered on the file plan, not business needs.



Wise Practices for Establishing Balance

Practices you can implement now to support access to information and protection of privacy



Open by Design



Open Unless

DO

- Examine workgroup business, workflows and content to understand and identify what is truly sensitive in nature
- Design specific spaces to segregate/isolate that content with strictly managed permissions and governance
- Make the remainder of content *read only* to the organization at large so the content is findable and reusable
- Change user/employee perceptions around accountability in accessing information

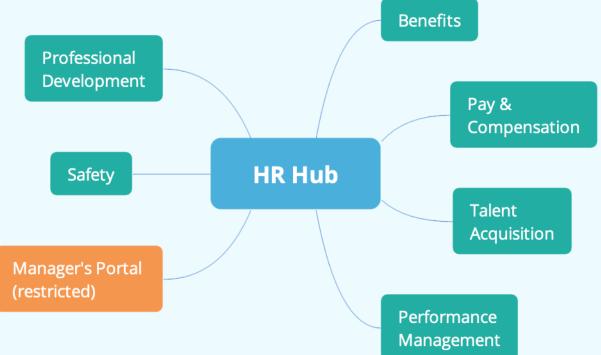
SEE

- Improved Search Results
- A reduction in ROT leading to a reliable single source of truth
- Increased efficiency through reuse of existing content and an increased ability to collaborate
- Less complex permissions easier to manage long term and requires less overhead
- Increased user adoption of the solution less rogue content
- Increased efficiency in responding to Freedom of Information Requests
- Organization wide support for open access



Open by Design in SharePoint

- Flat Hierarchies Use Hub sites to allow for easier management of permissions as well as separation of sensitive information
- Permissions Should be managed at the highest level possible
- Read Access Use the Visitors SharePoint group to give 'everyone' read access to sites
- Share Use sharing links to share documents and avoid send documents via email
- Collaborate- Work on documents together in place.



Access to Discovery Solutions

- Open Unless design may not always provide information professionals sufficient access to effectively manage the information lifecycle and monitor compliance.
- Records and information managers ought to have access to their organization's eDiscovery tool(s) to perform elevated duties like:
 - Placing content related to ongoing litigation on a legal hold.
 - Producing statistical reports on records retention and classification in an EDRMS to monitor compliance.
 - Collecting, redacting, and analyzing information subject to an FOI request.
- Total reliance on business units to provide (and curate) records responsive to an FOI request can result in information gaps, delays, and <u>effective denial of access.</u>



Applications for Microsoft Purview eDiscovery



Information Holds

Place data locations like mailboxes on hold to prevent information from being destroyed during an investigation.



Elevated Search

Perform comprehensive global searches that extend the searcher's ordinary viewing permissions.



Collection Analysis

Leverage analytical features like duplicate detection, conversation threading, and tagging to interpret and organize review sets.

Redact & Export

Search for and apply redactions to personal information before exporting for broader distribution.



Information Protection



Information & Privacy Protection

Effective protection of sensitive and personal information requires that organizations plan and invest resources across three themes:

- **1.** Identification of sensitive and personally-identifiable information in the organization and its use.
- 2. Prevention of privacy incidents, erroneous disclosure, and PII misuse.
- **3.** Governance over information privacy measures, instruments, and reporting



Identification

We cannot govern what we cannot see

- Maintain data inventories identifying types, locations, and uses of PII in the organization.
- Implement governance instruments like Privacy Impact Assessments (PIAs) to monitor changing information and collection practices.
- Adopt compliance-oriented technology that can identify and report on the presence and use of sensitive information types in content repositories and productivity apps.
 - Example: Microsoft Purview
 Data Classification



Prevention

Guard against potential incidents before they can occur

- Educate staff on their duties around information protection and privacy awareness through regular, mandatory training.
- Provide clear, simple mechanisms for employees to report incidents or potential risks, and to ask questions.
- Harmonize principles of open access to information and protection of personal and sensitive information through securityaware architecture: "Open Unless"
- Ensure records are defensibly destroyed when their retention period elapses.
- Buttress standards and training with technologies that remind and/or enforce proper information use, such as:
 - Microsoft Purview sensitivity labels for visual marking and encryption
 - Data Loss Prevention policies



Governance

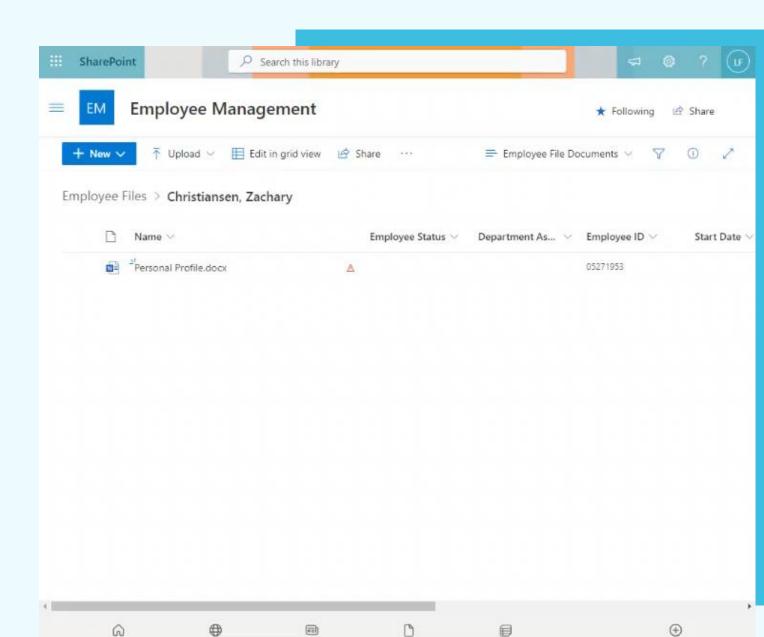
Empower initiatives with strong roles and policy framework.

- Establish clear roles and accountabilities for identification, reporting, and planning, and other actions related to privacy and information protection.
- Consult privacy experts in the organization when implementing new technologies.
- Routinely review and update policy and procedural instruments to reflect changes to legislation and working conditions.
- Encourage and standardize the development of PIAs, Information Sharing Agreements, and PIBs in the organization to strengthen oversight.
- Adopt technologies that can assist in reporting on and addressing information privacy risks in the workplace.



Identifying & Protecting PII in SharePoint

Purview Information Protection and Data Loss Prevention



Achieving Balance



Summary

- Support the shift from a *need to know* mentality to *a open unless* mentality to support access to information within your organization.
- Elevate Discovery to better support responsiveness to external requests for information.
- Governance and Technology (tools) are needed to prevent information incidents.
- Plan. Initiatives to better support Access and Information Protection take time, internal support, and an understanding of the tools available.



Learn more at our website

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Blog Post on these Topics

What are SharePoint Online hub sites? — Gravity Union

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