Microsoft SharePoint and Records Management Compliance

White Paper

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Summary

This White Paper discusses Microsoft SharePoint's compliance to Australian Government legislative, accountability, and mandated records management requirements. The paper presents Government findings and concludes that SharePoint is not a recordkeeping system and must be specifically configured to provide or extend certain recordkeeping features and functionality. It notes that care should be taken to avoid customising a SharePoint implementation to ensure ongoing product support and maintenance.

Even with the release of SharePoint 2013, organisations needing to ensure records compliance have recognised that the gap between native SharePoint functionality and the legislative requirements to manage records is substantial.

The paper then discusses covering these records management gaps by using the HP Records Manager (HP RM) SharePoint Integration. Not only can this product ensure a SharePoint environment is compliant to Australian records management standards, it can reduce the total cost of ownership of Microsoft SharePoint (estimated at $49 per user, per month) by controlling and managing the information within SharePoint using information lifecycle management policies.

Establishing a SharePoint environment that all staff are comfortable using, then integrating the HP RM Electronic Document and Records Management System into the backend for seamless records management allows the user to access the full capabilities of SharePoint while records are captured seamlessly and information is appropriately governed across the enterprise.

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Introduction

Microsoft SharePoint is typically used as a Content Management System (CMS) and collaboration platform. While more recent versions of SharePoint include native Electronic Document Management (EDM) capabilities within the core product, these features do not fully comply with Australian Government legislative, accountability, and mandated records management requirements.

Although SharePoint provides a robust CMS, it offers only limited cataloguing and records declaration capabilities and, within an EDM paradigm, it wilfully allows duplicate records to be created. That is, the information architecture that facilitates the rich collaboration within SharePoint requires the storage of current, legacy, and inactive content in the same manner and without distinction. Even in the more recent versions of SharePoint, it is unable to distil and apply varying legal requirements and differing policies to content within a SharePoint workspace.

SharePoint's records management capabilities are also rudimentary, with categorisation limited to either content type or site/list location. It cannot use both, making it difficult to choose the best approach for managing an organisation's content, and can result in documents of a given type being subject to the same information management policy regardless of business requirement. The ability to manage application and compliance lifecycles in an integrated manner to ensure the appropriate management of SharePoint content throughout its lifecycle is limited, and exposes the organization to compliance gaps and risk.

Given these characteristics, it isn't surprising that industry analysts report that over 60% of organisations have yet to bring their SharePoint deployments in line with existing corporate and regulatory compliance policies.

Government Assessments

The NSW State Records Office states that "SharePoint is not a recordkeeping system (i.e. a system purposely designed to capture, maintain and provide access to records over time). When implemented 'out of the box', SharePoint has limited capacities for

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capturing and keeping records in a way that supports their ability to function as authentic evidence of business".[1]

NSW State Records Office concludes that in addition to considerable configuration to meet records management requirements, SharePoint 2010 has the following records management functional limitations:

- Document IDs can only be generated for documents and Document Sets (not records in other formats, e.g. list items, wiki pages and blog posts). Additional configuration is required to generate identifiers that are unique across a SharePoint Farm.
- SharePoint must be configured or enhanced with add-on software to retain metadata for deleted records. SharePoint does not retain metadata for records that have been exported.
- Records exported from SharePoint lose certain contextual metadata, only retaining any metadata embedded in each record.
- SharePoint must … be configured or enhanced with add-on software to convert records other than those created with Microsoft Office products to long-term, open preservation formats (e.g. PDF/A).[2]

Additionally, the Wise Technology Group evaluated SharePoint against the National Archives of Australia ISO 16175 Principles and Functional Requirements for Records in Electronic Office Environments. In summary, it said that in reviewing SharePoint 2010:

"In the case of SharePoint 2010, … [it] does not possess some key functionality needed for full compliance, particularly the gaps with:

- Native security classification and access control – despite having item level security SharePoint 2010 is unable to impose classifications on information, or to control access effectively.

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[1] http://www.records.nsw.gov.au/recordkeeping/advice/designing-implementing-and-managingsystems/sharepoint-2010-recordkeeping-considerations

[2] http://www.records.nsw.gov.au/recordkeeping/advice/designing-implementing-and-managingsystems/sharepoint-2010-recordkeeping-considerations/appendix-1

- Physical and hybrid information management tools – SharePoint 2010 is focused on electronic records and is unable to manage paper and other physical format information effectively.
- Ease of email capture – despite SharePoint supporting email enabled lists and libraries, third party Outlook add-ins are still required to simplify user capture of email and required metadata ." [3]

UK National Archives in <u>Records Management in SharePoint 2010 – Implications and Issues</u> states the following:

- Deletion of records will permanently destroy all content and user information.
- SharePoint has a number of issues in relation to management of metadata for records.
- Records exported from SharePoint can lose their contextual metadata, creating significant records management risks.
- It is not possible to create disposal triggers for related records (which have different content types) using an external event as the trigger for disposal (e.g. the end of a financial year).
- Integration with MS Outlook is not supported by SharePoint.

Finally, the Tasmanian Archive and Heritage Office, in <u>Information Management Advice: No 22 Records Management Using SharePoint 2010 - considerations</u> provides a useful conclusion:

"**SharePoint is not a recordkeeping system** (i.e. a system purposely designed to capture, maintain and provide access to records over time). When implemented 'out of the box', SharePoint has limited capacities for capturing and keeping records in a way that supports their ability to function as authentic evidence of business…….

SharePoint must be configured to provide or extend certain recordkeeping features and functionality. However, care should be taken to **avoid customising** a SharePoint implementation (e.g. by making direct changes to the database schema, modifying files on the file system or excessively modifying the out of the box templates). If customised rather than configured, a SharePoint implementation may become unsupported."

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[3] Implementing SharePoint 2010 as a Compliant Information Management Platform, Wise Technology Management 2010, p4

SharePoint 2013

Microsoft SharePoint 2013 attempts to resolve some of these issues, but only includes minor improvements to features such as unified search and holds, site policies for closure and deletion, and site mailbox integration.

The key records management gaps still include physical records management and unique ID unification across the SharePoint environment. This latter issue is where unique ID's can be generated for each document library, site, or site collection level through configuration but duplicates still occur across a SharePoint farm, and the ID pattern cannot be amended without custom code development. Additionally there is still no event based retention or disposition tracking, retention of metadata after disposal, and limitations in file plan management, reporting, metadata and version control.

The bottom line is that even with SharePoint 2013, organisations needing to ensure records compliance have recognised that the gap between the native capabilities of the software and the legislative requirements are still substantial.

Using the HP Records Manager Integration

Microsoft is supporting full compliance through integrating with existing EDRMS', such as HP Records Manager (HP RM), which allow organisations to maximize the value of their SharePoint investment while supporting effective compliance and governance. HP RM offers two SharePoint integration methods:

1. **Records Management function** that can 'transparently manage, finalize, relocate, and archive SharePoint content such as blogs, wikis, discussions, documents, forms, and published pages for the end user according to established business rules'.
2. **Archive capability** that 'enables administrators to set lifetime management policies on content for automatic archival of entire sites'.

The HP RM Integration for SharePoint allows users to leverage complete SharePoint functionality without compromise and does not need end users to engage in, or undertake, records management tasks. Removing the records management burden from users reduces barriers to adoption and associated training overheads.

SharePoint uses hierarchical site and list structures, while HP RM uses a hierarchical folder structure that may be built on the business classification scheme. SharePoint users are relatively indifferent to governance and these weaknesses don't matter to them since they

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don't interfere with daily work. Using records management structures forces users to organize information in a way that doesn't match how they use the information. It's unfamiliar to them and requires greater levels of user training.

Using the HP RM – SharePoint integration shields the user from these prescriptive structures, allowing them to focus on their use case while the HP RM integration transparently manages the records at the back end.

Figure 1 shows a typical Microsoft SharePoint user interface. The HP RM integration is active in this interface (noted by the 'managed' status of the documents in the Management column of the SharePoint interface), but the integration is not pervasive.
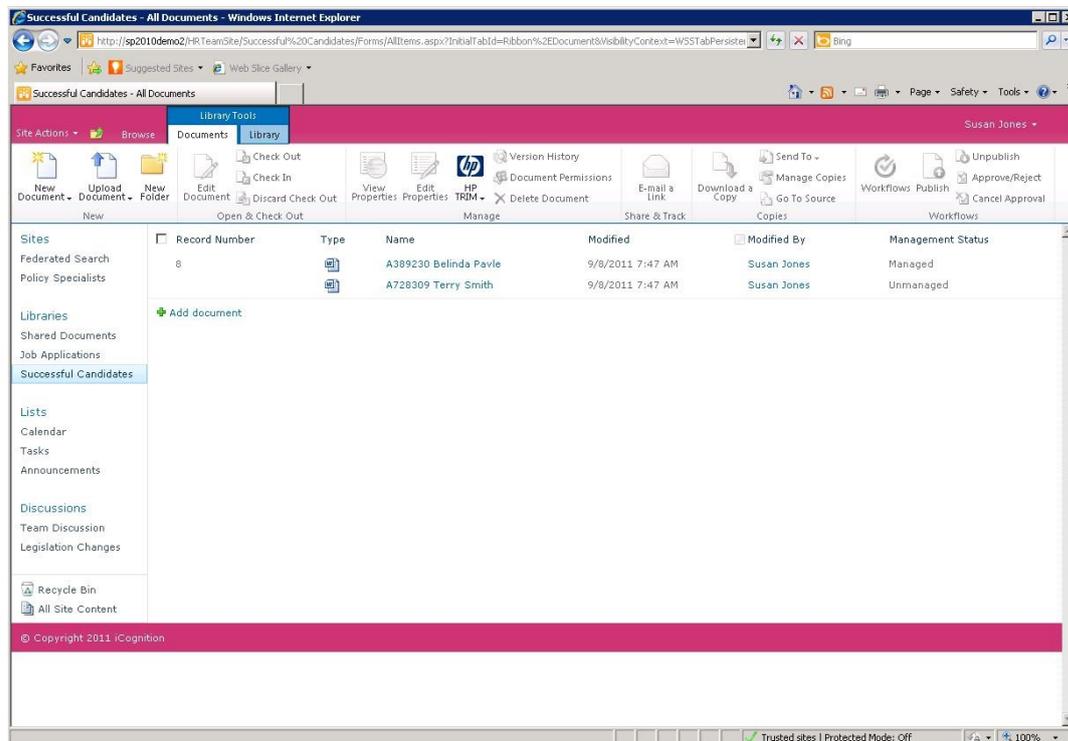

Figure 1: Microsoft SharePoint 2010 Interface

HP RM Integration Benefits

The benefits of using the HP RM integration are significant. Records managers, compliance officers, risk managers, and others tasked with addressing cost, compliance, and risk requirements can find all the information classified in a particular way, reducing the time and cost of information governance tasks. Using the HP RM integration enables records managers and users to navigate the business classification and uncover the

information that belongs to each category, while end users continue to organise the information the way they want to see it.

Using the HP RM integration also enables information to be surfaced in multiple places in SharePoint while maintaining a single authoritative record. Without the integration, there are no restrictions to prevent the creation of duplicate information in SharePoint. For example, SharePoint's mechanism for copying actually makes a new copy of the file, not just a link to the original, making additional duplication inevitable. Since SharePoint does not support de-duplication within a document library, the ongoing accumulation of duplicate records strains the storage system. The nature of this duplication also increases the risk of error due to the fact that there is no single authoritative source. Ultimately, this ever growing information footprint and associated storage starts to impact the IT Managers budget and resources.

SharePoint itself also has difficultly in applying retention policies based on the type, classification, or location of information, rendering these more efficient approaches unavailable and exposing the organization to risk. HP RM can apply retention policy to information based on its type, location, and classification, either automatically or ad-hoc. Studies have shown that, on average, 60% of data stored in SharePoint is never accessed again after three months from its creation date. Yet SharePoint makes no distinction between the older, rarely accessed items and newer content for more efficient and cost effective storage. HP RM supports tiered storage and configurable caching options to balance the need for search and retrieval speed with storage costs. Old and inactive information can be moved to appropriate storage to meet the needs of the organization.

The use of the HP RM integration also applies governance and control over information. In SharePoint, people can easily create sites, lists, and content that information governance personnel have no way of controlling or bringing into compliance. Security and access to this information is governed by the individual and not corporate or regulatory policy. The HP RM integration controls and manages this creation process.

Conclusion

SharePoint still has a reasonable gap to cover before it can manage records to be fully compliant with Australian legislative requirements and international standards. The combined offering of HP RM and SharePoint provides a significant records management compliance capability to SharePoint by transparently capturing records from the SharePoint system.

HP RM offers a records management policy engine that extends the native document and records management capabilities in Microsoft SharePoint and Office 365 to provide a compliant document and records management platform for Microsoft solutions in a variety of deployment scenarios (whether on premise, hybrid cloud or fully managed public cloud).

HP RM delivers much needed control over SharePoint information, applying compliance policy, security, and audit capabilities to managed content, including policy enforcement at the time of site creation. These SharePoint security and risk considerations can bloat SharePoint's already considerable cost of ownership. Taking into account hardware, software, deployment, information storage, app development, and ongoing labour costs in eDiscovery, administration, governance, and management, SharePoint management adds up to an average cost of $49 per user, per month[4].

This cost does not decrease, even as the usage of SharePoint expands within the organization, despite expected improvements in economies of scale that normally come from increased technology uptake. Using the HP RM integration can reduce these costs by controlling and managing the information within SharePoint using information lifecycle management policies.

Establishing a SharePoint environment that all staff are comfortable using, then integrating the HP RM EDRMS into the backend for seamless records management allows the user to access the full capabilities of SharePoint to capture and manage documents, meanwhile records are captured as a seamless backend process. This can be achieved using the standard HP RM SharePoint Integration modules.

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[4] In 2012, an independent research report conducted by Osterman Research on SharePoint compared usage trends, costs and inhibitors over the past two years. The survey of IT executives and managers at mid-to-large enterprises found that the mean cost of ownership per user per month for SharePoint increased to $48.47 in 2012, rising from $45.77 in 2011. This growth was expected to continue.

About iCognition

iCognition provides practical leadership, solutions and services for the management and governance of enterprise information. Our vision is to be the trusted advisor of choice to our clients for enterprise-wide information management and governance consultancy and solutions implementation.

iCognition's goal is to ensure enterprises maximise the value of their information, while minimising cost and risk. We use an integrated Information Governance model that combines the disciplines of data, records, and information management to value, manage, control and harness information across the enterprise. This model applies a strategic design approach at the policy, governance, systems and change management levels.

At the systems level we provide useful, usability, effective and satisfying information management systems. We combine business and technical skills to deliver well designed and considered solutions and cloud services using a combination of third-party products, integrated systems, and value-added Commercial-Off-The-Shelf interfaces and solutions developed by iCognition, called our **Diem Solutions**.