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An IG Perspective on Data Governance in Law Firms

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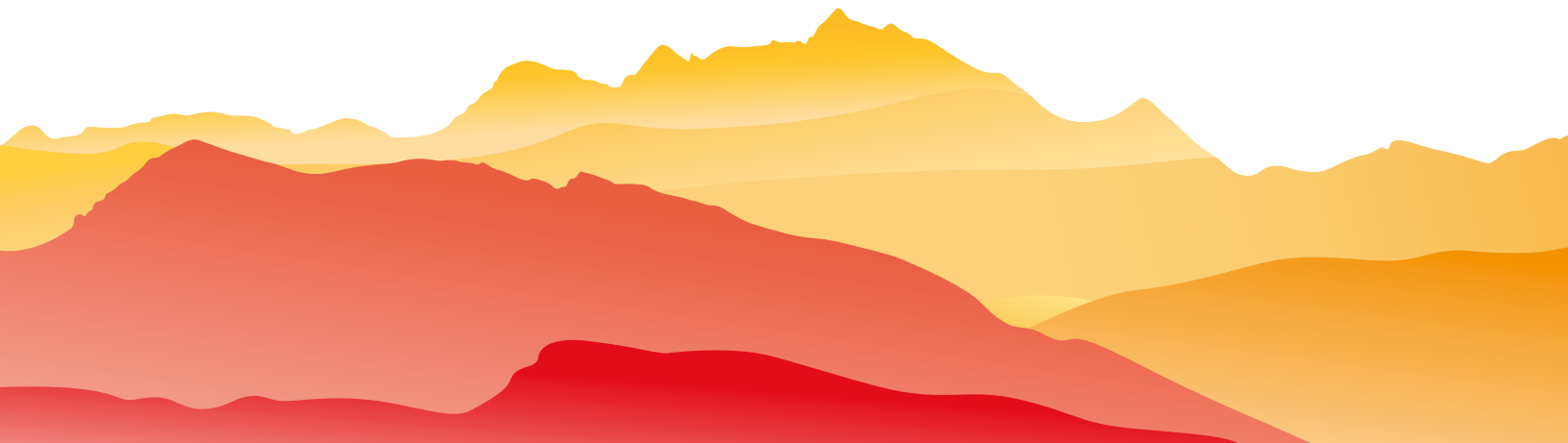
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Introduction

In its initial publication in 2012, the Law Firm Information Governance Symposium (LFIGS) established a framework for Information Governance (IG) which was fundamental in changing the way law firms viewed and treated their information. The LFIGS IG framework was updated in 2019 to reflect the changes and maturing of the discipline. This year, the Symposium assembled a team to begin thinking about and describing what Data Governance (DG) is through the lens of Information Governance. While IG is now well-established as a practice, it continues to be a challenging area for many law firms. Along with established Records Management and Information Governance programs, law firms must now grapple with how to govern data assets. For a law firm, data assets can include information on attorneys, clients, matters, type of work performed, case outcomes, financials, HR-related information, expertise, and the like. Since the data exists in a plethora of firm repositories and is administered by numerous departments, a multi-disciplinary approach to governing these assets is an essential part of a firm's data strategy. Data Governance can be used to answer the question of how a law firm can create standards, achieve consistency, ensure accuracy, and create security around this data.

This paper attempts to provide perspective on DG and how it can support transformational change in law firms—both in the practice and business of law. We begin this paper with a definition of DG which relies heavily on Master Data Management (MDM). Gartner describes the concept of MDM as "a technology-enabled discipline in which business and IT work together to ensure the uniformity, accuracy, stewardship, semantic consistency, and accountability of the enterprise's official shared master data assets." With the acceleration of digital transformation, the points of intersection between traditional IG and DG functions have increased. This has resulted in the addition of new stakeholders and the creation of new roles to address these questions and challenges. To complement the findings captured in this paper, an informal survey was conducted by the authors of this paper with a random sampling of 100 law firms, all of which were either AM Law 200 or Magic Circle firms. Thirty-seven firms responded to our survey and those results are mentioned throughout this paper. The complete results can be found in the Appendix.

A DG program needs to consider traditional IG principles with a focus on utilizing data to influence and guide business fundamentals, to support advice, and to enhance client service delivery. Deciding on where to start in this vast data universe can be daunting. Therefore, it's important to understand the overarching strategy and what the firm hopes to accomplish first, and then pick an area that can accomplish a specific business-related purpose. This paper aims to aid your deep dive into the DG universe.

Defining Data and Information Governance

Both Data and Information Governance are necessary to provide the guardrails to protect, preserve, organize, dispose of, and grant appropriate access to the data and information within organizations. But there can be confusion as to what is meant by DG vs. IG: are they synonymous, or are they related but distinct disciplines that require a varying perspective and a different point of view? Given that the terms 'data' and 'information' are often used interchangeably, it is important to clearly define both terms when discussing the governance of each.

From a high-level perspective, data begets information, and information begets knowledge. Data within an organization consists of various pieces of discrete values gathered through operational procedures and becomes information when those discrete pieces are combined to answer questions and/or solve business problems as well as to create new opportunities using artificial intelligence. A good analogy of the difference between data and information is a LEGO® set. Separately, the individual pieces are equivalent to bits of data—discrete but not necessarily having meaning. When combined into the resulting object, whether a flower, a ship, or a castle, the individual pieces combine to create something recognizable that is the equivalent to information.

In 2019, as part of its LFIGS 2.0 paper, the Symposium updated its original definition of IG as:

"Information governance in a law firm focuses on the management of client representation and business information by ensuring appropriate behavior in the valuation, creation, storage, use, protection, archiving, and deletion of information. It is an organization-wide framework for managing information throughout its lifecycle and for supporting the firm's strategy, operations, and ethical, legal, regulatory, risk, and environmental requirements. IG establishes the authorities, processes, capabilities, structures, supporting mechanisms, and infrastructure to enable information to be a useful asset in delivering client services while reducing liability to a firm."

This definition included "technology and data governance" together as part of the larger IG framework, and defined that as:

"The process of providing guidance on data organization, classification, and migration; systems selection, capabilities, and implementation; commissioning, decommissioning, and/or developing systems; and information migration to ensure it is consistent with IG principles."

With the rise of analytics and large data sets, DG has emerged as a distinct discipline within organizations and has matured independently to the extent that it now warrants its own treatise. To that end, the Symposium proposes DG within a law firm be defined as:

Data Governance is a set of policies, processes, and practices to maintain an enterprise data model that addresses data quality, integrity, reliability, accessibility, and usability within an organization. These include the management of data elements/metadata to ensure the data is standardized, accurate, consistent, and complete across systems. By informing both the business and practice of law to support operational goals and strategies, Data Governance allows organizations to turn data into information, knowledge, and insights.

What do these definitions mean, and how does this definition of DG stack up against our definition of IG? IG is a framework for managing information throughout its lifecycle. DG represents the discrete practices that go into managing data quality, access, and integrity across the organization. Practical application of DG within an organization includes ensuring that information can be distilled from various data sources across the enterprise and that the meaning of various pieces of data is consistent across all systems.

Key objectives for a DG program, as they relate to IG, include:

> Leverage the vast amount of data across the firm to support better decisions for the business

> Define data stewardship roles and responsibilities

> Establish a system of record for distinct data elements within an enterprise data model that defines the flow of data elements

> Develop system controls and protocols for data classification

> Ensure the data is accurate, consistent, and complete to add credibility to reporting and analytics

> Manage access to data elements consistently

> Educate users on policies, processes, and practices

Next, this paper explores how law firms are working to achieve these and other DG objectives.

Data Governance in law firms

What is giving rise to Data Governance in law firms?

Data governance is essential for law firms because data has inherent value despite not being recognized by generally accepted accounting principles (GAAP) as an asset on the balance sheet. In the law firm survey conducted by the authors to support this paper, 97% of responding firms agreed that their firm recognized data as a valued and strategic asset. To further support this statement, the survey confirmed that 49% of the responding firms now have a designated DG function. It is reasonable to expect this to grow as firms become more sophisticated in their use of large data sets and large language models to support the practice of law and the business of law.

Analytics, business intelligence, and compliance

All data, structured or unstructured, needs to be viewed through multiple dimensions, among them compliance and business purpose.

Compliance focuses on the "nuts and bolts" of the DG perspective. Questions in this dimension include:

> How best to secure the data?

> What are the rights of use and what access controls should be put in place?

> What retention and disposition policies apply to the data?

> Are there data privacy and protection elements to this data (PPI)?

Business purpose is broader in scope and is focused on the mining of data and using analytics to drive new insights. Those insights may include trends and forecasting which may have a direct client impact via new services and offerings. Other insights may be used to improve internal processes and ensure compliance with established policies. Questions in this dimension may include:

> What is relevant to attorneys for ROI?

> What data can be mined to create new insights?

> What trends could be interesting to my business?

> Does the data need to be anonymized before it can be analyzed?

> The importance of organized, clean, reliable information–potentially kept forever.

For example, a firm might need to know who has worked on lease termination matters, determine what energy-related M&A deals the firm has handled, or list experience with Product Liability matters by office. Further, the firm might use historical information to best price a deal for a new client.

As firms begin to explore enterprise analytics and reporting, the importance of consistent quality data across the organization becomes clear.

> Business intelligence - displaying data in a meaningful way to business professionals (e.g., how many new matters right now)

> Analytics - using advanced mathematical technologies to be able to tell a broader story about data by combining and analyzing information in a more advanced way (e.g., how many new matters this year vs. last year)

> Advanced modeling - Augmenting internal data sets with public and private, subscription-based data sets to develop sophisticated predictive models that can drive competitive advantage.

For example, firms must ensure that they comply with Outside Counsel Guidelines including an understanding ofwhat information the firm must return to a client, client restrictions on the use of the data to only the purpose for which it was provided, and specific guidelines to follow for managing and tracking data.

Within a law firm, DG ensures that critical data is well-managed, consistent, high-quality, compliant, trusted, and accessible, benefiting the firm in multiple areas, such as:

> Reducing risks by complying with data privacy and security regulations

> Improving the data security within the firm, avoiding data breaches

> Improving operations by streamlining workflows and reducing manual errors

> Increasing revenue by enhancing client satisfaction, retention, and loyalty

> Producing new revenue streams by creating innovative data-driven products and services

> Improving the quality of current products by ensuring data accuracy and reliability

> Establishing competitive differentiation by leveraging data as a strategic asset and a source of insight

Law firms are viewing DG as essential for their success in the digital age.

Data Quality

If quality isn't there, business decisions get ahead of quality and trust is diminished.

Elements of a DG program and their benefits:

> Data privacy compliance: Supports compliance with various data protection regulations, such as GDPR, HIPAA, CPRA, and other various federal and state regulations by establishing clear roles and responsibilities for data collection, processing, storage, access, and sharing. DG programs can also help law firms implement data security measures, such as encryption, anonymization, or pseudonymization, to protect sensitive client data from unauthorized access or breach.

> Centralized data access management: Defines the controls around who can access what data and for what purpose. DG programs can define and enforce data policies and rules that specify the data access rights and privileges for different roles and groups within the firm. DG can also monitor and audit data usage and compliance to ensure adherence to data policies and regulations.

> Data discovery and data literacy: Improves the firm's decision-making by making data more accessible and understandable to all stakeholders. DG programs can provide data catalogs, metadata management, data lineage, and data quality indicators to help users find, trust, and use data effectively. DG can also provide opportunities for education and training to help build data skills and competencies, leading to better data quality. In our survey, only 35% of responding firms have instituted some formal standards for data entry and data quality, and only 24% of firms have provided some DG training.

> Collaborative analytics or building new data products: Law firms can leverage their data assets to create value-added services for their clients, such as benchmarking, risk assessment, or predictive analytics. DG programs can also enable cross-functional collaboration and innovation among different practice areas and business functions by ensuring data quality, consistency, and availability.

Law firm Data Governance applied to real world challenges:

| Use case	Governance requirement
Talent Analytics: Focusing on recruitment strategies, path to partnership, attrition, practice group planning, resource management, DEI reporting and tracking	Alignment on titles, properly classifying contractors; protecting DEI classes, tracking opt-outs of DEI information (e.g., if you elect not to share your gender identity or race)
Financial Analytics: Detailed matter pricing; Client trend analysis; Phase and Task pricing	Aligning the firm on client groups (parent/child); Unified matter taxonomy
Marketing Analytics: White-space* reporting for client relationships; industry expertise; individual experience across multiple factors including matter and client type (* White space = untapped areas of increased engagement with clients)	Properly categorized matters; Application of market sensitive/walled/client consent rules for data usage; Up-to-date data about clients (e.g., size, location, industry)
Compliance: Focusing on compliance with internal policies as well as external regulations	Identification of data responsible to DSARs, measurement of compliance with storing data in approved repositories

With such a large variety of DG opportunities and challenges, the structure of what these programs look like is evolving, as explained in the next section.

Data Governance within the law firm structure

Firms are beginning to create roles and entire teams dedicated to Data Governance. Like many other areas, including Information Governance, using data in law firms is still nascent. Momentum is growing within firms as new use cases and drivers for "using" data continue to grow. Many firms are pushing initiatives today with the idea of governing the process later, prioritizing value over risk in some instances.

The law firm survey specifically asked about existing DG roles and reporting structures. Responders were instructed to focus on the functional responsibilities of each role and not the Director/Manager/Analyst/Specialist aspect or level of the job title. They were also instructed to select all roles that exist today within their organization (i.e., this was a multi-valued response) and the volume of responses lent credibility to the growing trend of DG as its own distinct discipline.

Q7: Does your firm conduct training that educates staff and lawyers about the value/importance of proper Data Governance using concrete examples from everyday work

21.05% 23.68% 55.26%

■ Yes ■ No ■ Uncertain
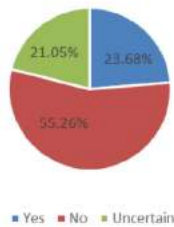
As reported earlier, 49% of law firms responding to our survey confirmed having a designated DG function, but where does this live within the organizational structure? Less than 5% of firms have a stand-alone DG department and the vast majority of firms surveyed (59%) have DG within the Information Technology department, 23% within IG, and 13% within Knowledge Management. Some firms report that DG is a shared function between two or more groups. As the role of DG continues to mature, it is likely to emerge as an entity of its own. The industry saw a similar maturation of IG in the recent past.

Firms vary greatly in the number of full-time equivalent positions that are dedicated to the Data Governance function. The survey results indicate staffing levels ranging between zero and 50, with the most common number of FTEs, being either 5 or 0. Specifically, there were five firms that reported 5 FTEs and another five firms that reported 0 FTEs. Having a vast range and a very low mode explains why the average is only 0.78125 and the median is 4. See the Appendix for the actual supporting details.

With many firms still early in their data governance journey, how can the Information Governance professional best help Data Governance initiatives? The next section contains some possible answers.

Data Governance for the Information Governance professional

Due to the relatively new adoption of Data Governance in law firms, most law firm Information Governance professionals are just starting to learn about what is involved with it, although some are helping their firms lean into it. There are many areas where DG and IG could overlap or complement each other.

Review structured systems

Since many IG professionals spend most of their time focused on unstructured data, it is helpful to get experience in analyzing structured data systems, to determine what is a system of record, how data flows through the systems, and whether there are any mechanisms for deleting data when it is no longer needed. The analysis should include a focus on what personal data elements are included, and how they are processed, as a way to help address data privacy

compliance. It is essential to determine whether any of the data is being reused for any purpose other than the originally intended purpose.

Define concepts and vocabulary

Like IG, DG has its own distinct vocabulary, so another starting point is to get familiar with common DG concepts, such as data catalogs, data mapping, data dictionaries, master data management, and reference data management. (See the Appendix for definitions of these and other DG terms.) There is also an abundance of DG webinars and blog postings on the web, which are helpful for digging into these concepts.

It is possible to translate ARMA's IG principles into DG definitions as they apply to data compliance and access issues at law firms. See chart below.

Principle	Data Governance definition	What this means for law firms
Accountability	Firm administration shall designate a cross-functional team to be accountable for the administration of the DG program.	Establishing a "Data Officer," an individual with primary responsibility for overseeing the DG program and team, and ensuring proper data stewardship.
Transparency	Creating a clear, documented process for how and where data is stored; further the understanding of how data is used within an organization.	This could mean creating enterprise data mapping or data flow diagrams, which allow DG teams to understand how data is or can be leveraged by the firm. This is especially important for responding to audits regarding the use of sensitive data and reducing data bias.
Integrity	Ensuring the data available is high quality and consistently reliable.	Disseminating standards and policies to data owners and business users. Ensuring there are ongoing practices to monitor data quality and correct inaccuracies and anomalies.
Protection	Applying the appropriate level of controls to data assets.	Understanding data entitlement to ensure data is accessible exclusively to the intended audience. Auditing and documenting access is essential to evidencing and ensuring control.
Compliance	Implementing required controls and processes to be compliant with regulatory, business, and ethical obligations.	Auditing and documenting technical standards and controls to ensure compliance with various obligations, including ethical walls, client-provided guidelines, regulatory requirements, data privacy, and other business drivers.
Availability	Ensuring that data is readily accessible to those who need it when they need it.	Timely replication of data to facilitate real-time decision-making
Retention	Implementing the organization's defined retention policies and schedules.	Distilling enterprise data mapping to assist the firm in the identification of data assets, which must be included in the scope of the firm's retention schedule(s).
Disposition	Disposal of data assets is no longer required for business operations.	Executing and documenting the disposal of data assets to support the IG program's auditing of retention processes.

Understanding data use

The best way to get started with DG is to start investigating how your firm is using data. Reach out to the business to assess what kind(s) of data and information are driving business processes in your firm. Develop relationships with key individuals who lead business processes or data analytics initiatives within the firm. Often these initiatives include the use of data visualization tools to create key reports and dashboards for senior leadership. Ask questions and request demos; often the leaders of these initiatives are eager to share their efforts. Pay attention to firm strategic initiatives to see how DG and IG can support business goals.

Once you have a solid understanding of the use and oversight of data within your firm, incorporate a strategy and vision of how IG and DG should be working together on common governance concerns. The benefits of aligning DG with IG include:

> Optimized digital transformation

> Enhanced management of data and information

> Improved search and retrieval

> Boosted classification of data and information

> Consistent taxonomy

> Improved data integrity

> Enhanced compliance with Outside Counsel Guidelines (OCGs) and the firm's record retention requirements

> Enhanced compliance with data privacy regulations, with a greater ability to respond efficiently to data subject requests

Depending on the circumstances of your firm, you may find yourself in the position of being able to offer greater discipline to your firm's use of data to support key initiatives and strategies. In some cases, firm leadership may be looking for a logical "home" for DG and would welcome a volunteer to start tackling it.

Working together

The expertise of IG professionals in assessing compliance and risk across the firm, as well as understanding ethical and client requirements (such as Outside Counsel Guidelines and Business Associate Agreements) can strengthen any DG initiative. Often the relationships that IG professionals develop with key business leaders and stakeholders can be an asset in developing a DG program.

If there is already a mature or evolving DG program in your firm, it's important for all to recognize that DG efforts without IG input can fall short. Some DG programs may not pay sufficient attention to the costs and risks of maintaining data over time. IG can provide expertise on finding the right balance between meeting data analytics needs and considering the risks of over-retaining data with regulatory, e-discovery, or privacy (data minimization) requirements. Placing retention limits on the data (keeping in mind the need for business analytics over time) helps ensure that business insights are not drawn from stale data. IG can also assist with assessing and classifying data based on the sensitivity of the content, which in turn can lead to better security measures for sensitive data.

Those tempted to focus on IG without any involvement with DG could be selling their program short. Data Governance requires more granular oversight of a firm's application portfolio and data flow, which means that DG can expose access and permissions issues that the IG program may miss. Other aspects of the two programs can often overlap, including improved data privacy compliance, a better understanding of the scope of a firm's information portfolio, and improved access to key information.

Data Governance professionals also develop their own relationships with key business leaders and stakeholders and have areas of expertise that intersect with IG needs. There is often a willingness to invest in DG to boost the firm's competitive advantage, and it's always good to be associated with a well-funded program. If you can figure out a way to join forces, you can share the benefits of that funding.

Resolve potential conflicts

It is important to acknowledge that IG and DG can sometimes have conflicting objectives. Most often this can involve a clash between the needs of the business to harvest and analyze data, versus the risks and costs of complying with regulatory and data privacy requirements, as well as potential conflict with e-discovery and client requirements. The need to spot trends over time via analysis of historical data may require additional flexibility on data retention requirements set by IG policy. In those cases, it may make sense to revisit policies, or find ways to carve out exceptions. Data anonymization may also help achieve a balance of these competing priorities.

Navigating these potential conflicts reaps rewards and strengthens both programs. By working together, IG and DG professionals can better identify, map, and control key information/data assets of the firm. They can each add perspective on how to identify and protect sensitive data. They can work together on a framework of accountability for how data assets are managed and establish a coordinated approach to data ownership and protection, thus enhancing the accountability that comes with ownership.

Conclusion

Arguably, one of the largest drivers for Data Governance initiatives has been the rise in data analytics and visualization within organizations today. When a firm asks, for example, "what information do we have about the performance of a particular department or practice," the question is answered with the data available on how many hours are worked, the number of hours billed, the rates billed to clients, etc. It is important that such answers are reliable, and reliability starts with an effective DG program. Such programs, however, do not always consider the risks involved with maintaining such data.

As stated earlier, data begets information and is foundational to the information collected or maintained by an organization. While in an ideal world, firms would fully integrate Information Governance objectives into DG programs, responses to our survey would suggest that they largely remain distinct efforts. Depending on what drivers exist within a firm; one could have a robust retention and disposition program, and still have wide gaps in the specific processes that relate to DG. The reverse is also true; firms with a robust data access management or security infrastructure, from a systems perspective, could have poor processes or policies surrounding what data lives within each system and how to manage information. These functions must work hand in hand to support firms by providing the information they need, when they need it, at an appropriate level of risk.

The need for such a union has never been more important. As regulations and client requirements increasingly define how certain types of information can be maintained by an organization, IG professionals may need to play catch up, in some cases reactively diving into what data the firm possesses to best understand their obligations. For IG professionals who are in the middle of such an effort, this paper hopefully provides additional insights. For those who have not yet started such a journey, this paper will hopefully provide guidance on how to start and how to navigate what lies ahead. If nothing else, this paper demonstrates that IG is a necessary partner for the long-term success of DG, and you, the IG professional, have a key role to play in that success.

Appendix

Definitions

| Term	Definition
Structured data	Distinct data elements that are organized within a repository (typically a database) Examples include HR systems, accounting systems, and Relativity databases
Unstructured data	Data that is not typically organized in a predefined way. Examples include documents created in Word, PowerPoint, or PDF files – these in turn might be stored in document management systems or on hard drives or within SharePoint
Data catalog	An inventory of data assets and where they are located
Data mapping	The process of connecting a data field from one source to a data field in another source; important for successful data migration or integration
Data dictionary	A collection of metadata that describes the structure and content of data objects and models that can be used by programmers and others who need to refer to them
Master data management	Technology-enabled process(es) for IT and the business to work together to ensure a consistent process for data that is critical to the operation of the business
Reference data management	Data used to define and classify other data Examples include Country Codes, Currencies, Cost Centers, Region, and Unit of Measure
Data steward	An individual with knowledge of how a data set is used and managed by the business who helps enforce governance requirements and provides feedback to IT on data usage and quality; a data steward manages data and information assets on behalf of others and in the best interests of the organization
Business intelligence	Use of software to ingest business data and present it in reports, dashboards, and visualizations that can be used to improve business processes
Data analytics and visualization	The process of examining data sets to find trends and draw conclusions about the data, often done using charts and graphs
Data modeling	Creating a visual representation of an information system to illustrate connections between data points
Access control lists (ACLs)	List of which user(s) have access to a specific data resource
Data architecture	A description of how data is managed, from collection through transformation, distribution, consumption, and eventual disposition; essentially a blueprint for the way data flows through an organization's systems
Personally identifiable data	Personally identifiable information (PII) is any data that could potentially identify a specific individual; any information that can be used to distinguish one person from another and can be used to deanonymize previously anonymous data is considered PII; this may be a single piece of data or multiple data points taken in unison

Survey results

The authors of this paper conducted an informal survey with a random sampling of 100 law firms, all of which were either AM Law 200 or Magic Circle firms. Thirty-seven firms responded to the survey. These are the results.

Q1: Does your firm recognize data* as a valued and strategic asset? *Data within an organization consists of various pieces of discrete values gathered through operational procedures and becomes information when those discreet pieces are combined to answ
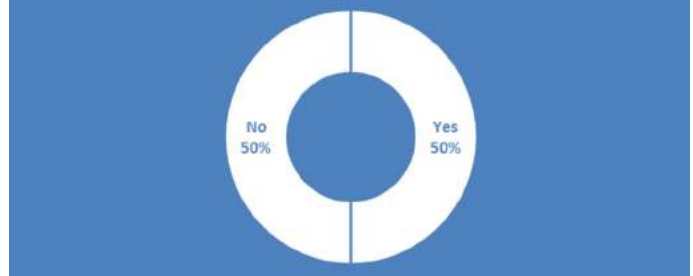

2.63%
97.37%

■ Yes ■ Uncertain
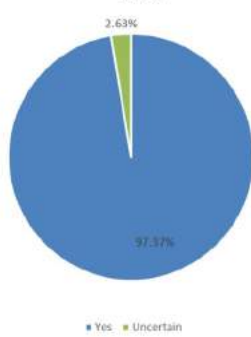
Q2: Does your firm have any type of data catalogue, data warehouse, data lake or any other type of master data management solution?

76.32% 15.79% 7.89%

■ Yes
■ No
■ Uncertain
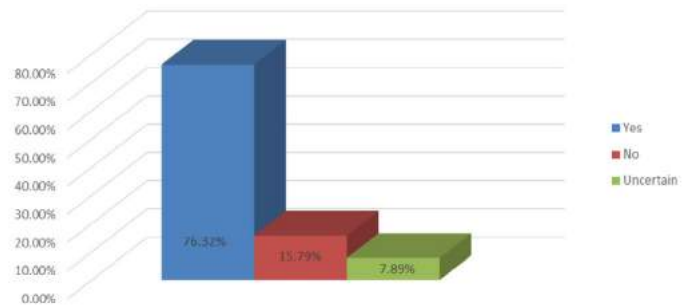
Q3: Who owns and manages the data lake?

Q4: DOES YOUR FIRM HAVE A DESIGNATED DATA GOVERNANCE FUNCTION?

No 50%   Yes 50%

Q5: If Yes, Where does this function live?
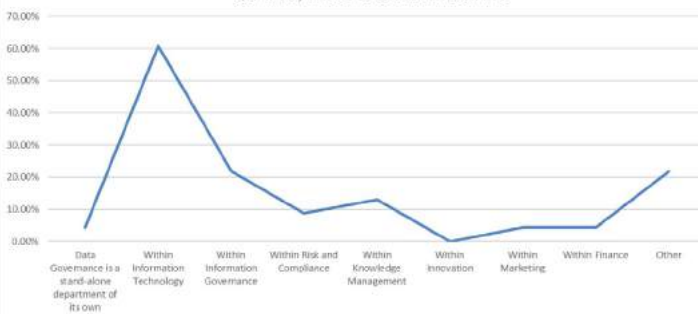
Q6: What data governance roles exist today?
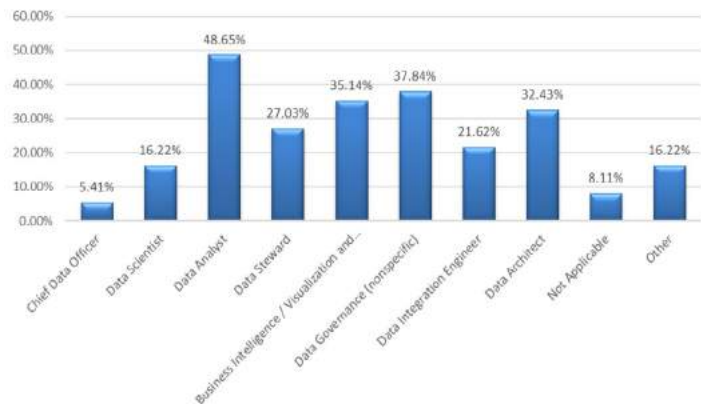
5.41% 16.22% 48.65% 27.03% 35.14% 37.84% 21.62% 32.43% 8.11% 16.22%

Q7: Does your firm conduct training that educates staff and lawyers about the value/importance of proper Data Governance using concrete examples from everyday work
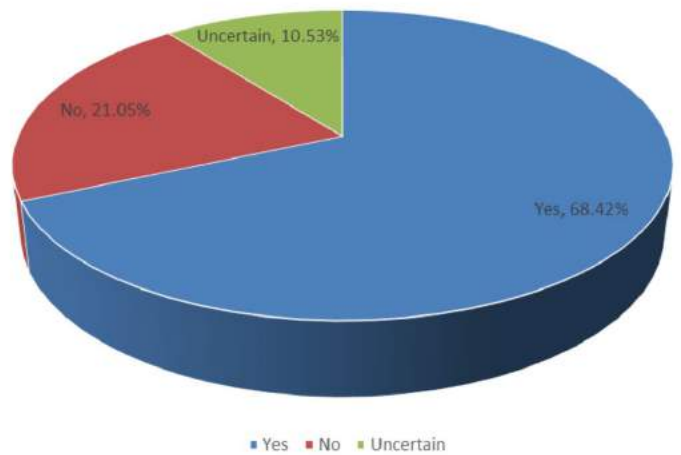

21.05% 23.68% 55.26%

■ Yes ■ No ■ Uncertain
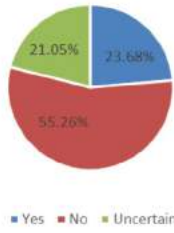
Q8: Approximately how many FTEs are dedicated to the Data Governance function across the firm?
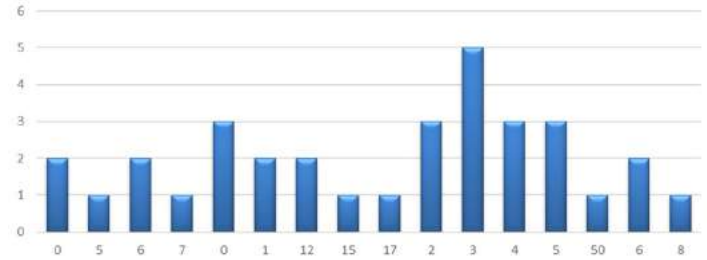
Q9: Has your firm defined formal standards for data entry and data quality?

Yes — 34.21%
No — 44.74%
Uncertain — 21.05%
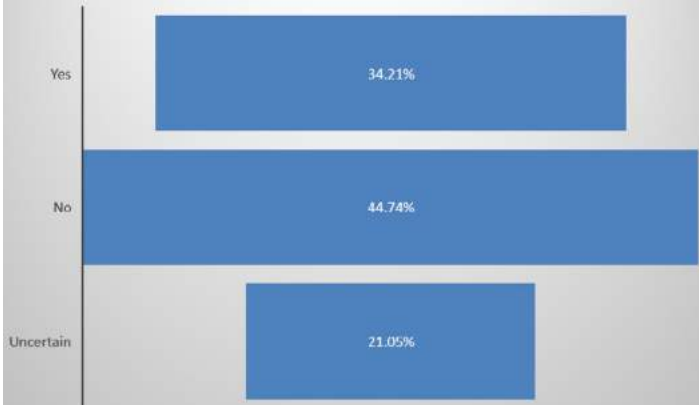
Q10: Has your firm conducted any large scale data clean-up efforts?

Uncertain, 10.53%
No, 21.05%
Yes, 68.42%

■ Yes ■ No ■ Uncertain

Q11: If yes, what was the driving force behind this?

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