



# RECORDS MANAGEMENT IN MICROSOFT 365: MOVING BEYOND THE CREATED DATE

Protiviti Perspective provided by Roger Z., Houston

# ABOUT ME



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Office Apps & Services MVP



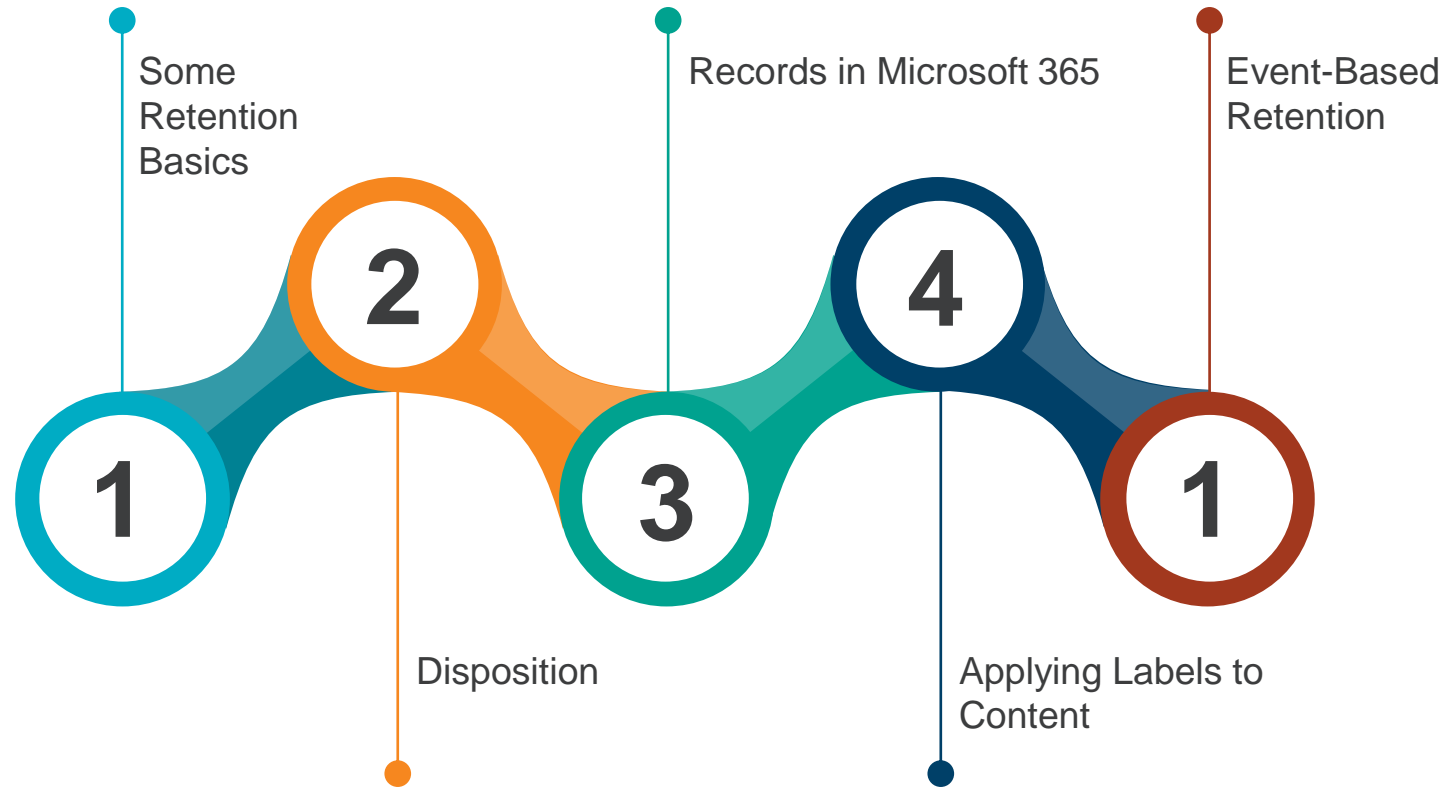
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# WHAT WE'LL DISCUSS TODAY



# STARTING WITH THE BASICS

Let's discuss retention in Microsoft 365

# HOW MICROSOFT 365 VIEWS RECORDS MANAGEMENT

## In-Place Records Management

- When declared as a record, data is not moved but maintained at the location it is currently stored. This helps to ensure users know where their data resides.
- When documents are archived for retention purposes they do not need to move. Microsoft 365 (M365) tracks and maintains content where it is.
- In fact, in order to move a declared record special permissions are required to do so.

## Disposition Control

- Once data is no longer required M365 doesn't simply remove it or archive it.
  - It can do this, but the preferred method is disposition reviews
- Disposition reviews allow data owners to determine if data should be maintained or removed.

## Information Management is More than Retention

- Labeled data (sensitivity or retention) can be used for easier searchability and organization
- Labels applied to data can be used for protecting data. The system can search for particular labels to apply protections to.
- Protection of sensitive data is a key component of records management in M365

## Balancing the Experience

- Records Management can be invasive. In some cases the processes can be so complex they are no longer user friendly
  - Things don't get done
- M365 provides automation processes to decrease user involvement, but still give the business the required controls to ensure proper data governance.

# MICROSOFT 365 LABEL OVERVIEW

Almost everything within M365 records and information management comes down to labels and how they are used. Labels are for more than just categorizing your data.

## Retention Labels

- Used for maintaining or removing documents based on the lifecycle required by the enterprise.
- Can be applied to documents in SharePoint, OneDrive, O365 Groups and emails within Exchange
- Labels can be applied manually by users at the document level or automatically by the system (\*E5 license\*)

### Not to be confused with:

- Ensures sensitive data is protected from improper use
- Different levels of usage
  - Tagging documents with sensitive data
  - Applying, headers, footers and watermarks to documents
  - Full encryption of sensitive data
- Can be applied manually by users or automatically (\*E5 license\*)

## Sensitivity Labels

# MICROSOFT 365 LABEL OVERVIEW

- Push retention labels to their destination
- Retention labels without a policy just exist as objects within the compliance center of M365.
- Controls where labels are available
- Can take up to 24 hours to publish labels to locations and up to 7 days for auto-labels to apply to existing data

## Retention Label Policies

### Not to be confused with:

## Retention Policies

- Allow for the application of retention policies at the site level (Big, Blunt Hammer Approach).
  - Does not have the ability to refine at the document level
- No user interaction as the policy is applied by M365 and not the user
- No disposition reviews available.
- When applied, is considered an implicit policy so can be overridden by manually set labels or if the order of precedence overrides the policy applied (see below)
- Creates a Preservation Hold library to ensure data is not permanently deleted from the site.



# MICROSOFT 365 LABEL POLICIES



## SharePoint Policies

- Applied at the site collection level (cannot be applied to subsites directly).
- Can select specific site collections or all.
- Can auto-apply labels to documents based on finding sensitive data types (ex. credit card number, SIN).
- Can auto-apply labels to documents based on keywords in documents and metadata.



## OneDrive Policies

- Applied at the User Level (site collection).
- Able to include or exclude specific users in the policy application.
- Can auto-apply labels to documents based on finding sensitive data types (ex. credit card number, SIN).
- Can auto-apply labels to documents based on keywords in documents and metadata.



# MICROSOFT 365 LABEL POLICIES



## Exchange Policies

- Sensitivity labels must be applied to all mailboxes for the users and groups selected in the policy.
- Auto-apply labels can only be applied to new (in-flight) messages.
- Messages at rest in user mailboxes will not have policies auto-applied.
- Retention labels can take up to 7 days to be made available to users.



## Microsoft 365 Group Policies

- Applied at the Group Level
- Applied to both the site itself (SharePoint) and the attached mailbox (Exchange)
- Auto-apply labels can only be applied to new (in-flight) messages.
- Can auto-apply labels to documents based on finding sensitive data types (ex. credit card number, SIN).
- Can auto-apply labels to documents based on keywords in documents and metadata.

# MICROSOFT 365 RETENTION LABELS

- **Required for Finalization of Documents**
  - Labels are used for declaring records within M365
  - During creation of a label the decision must be made then to declare documents as records when the label is applied.
  - Record declaring labels cannot be deleted.
- **Explicit Labels**
  - Applied directly to data by user.
  - Made available to locations within a policy
- **Implicit Labels**
  - Applied automatically
    - Content Queries
    - Location
    - Inherited by parent
- **Order of Precedence**



<https://docs.microsoft.com/en-us/office365/securitycompliance/labels#the-principles-of-retention-or-what-takes-precedence>

# MICROSOFT 365 RETENTION LABELS

Retention wins over deletion

Longest retention period wins

Explicit inclusion wins over implicit inclusion

Shortest deletion period wins

# DISPOSITION REVIEWS

# MICROSOFT 365 DISPOSITION REVIEWS AND PROCESSES



## Disposition reviews to allow data owners and record managers to:

- Completely dispose of the data from the O365 tenant
- Extend the retention if the data is still relevant or necessary for to maintain
- Relabel documents marked for retention



## Creating Disposition Reviews

- Defined at the label
- Reviewers are added individually. Only Mail-enabled security groups are currently supported
- Special permissions are required to view disposition reports (even if Global Admin)

# MICROSOFT 365 DISPOSITION REVIEWS AND PROCESSES



## Disposition Notifications

- Disposition reviewers receive notice **once a week**
- Notification does not contain actual documents (have to login to admin console)
- Can review dispositioned documents they have access to only.



## When is a document disposed?

- Only after being reviewed (deletion without review possible but has to be selected)
- Moved to recycle bin (SharePoint and OneDrive)
  - Deleted 93 days after entering recycle bin if not backed out
- Emails marked for disposition will be deleted 14 days after being tagged.
- All actions are tracked and reviewable in the M365 Audit Logs.

# MICROSOFT 365 DISPOSITION REVIEWS AND PROCESSES



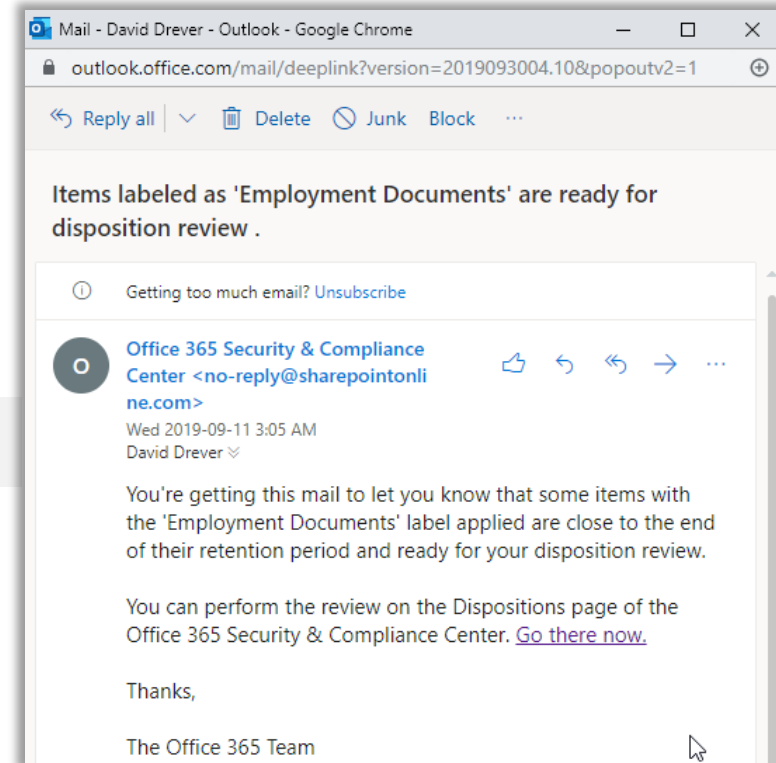
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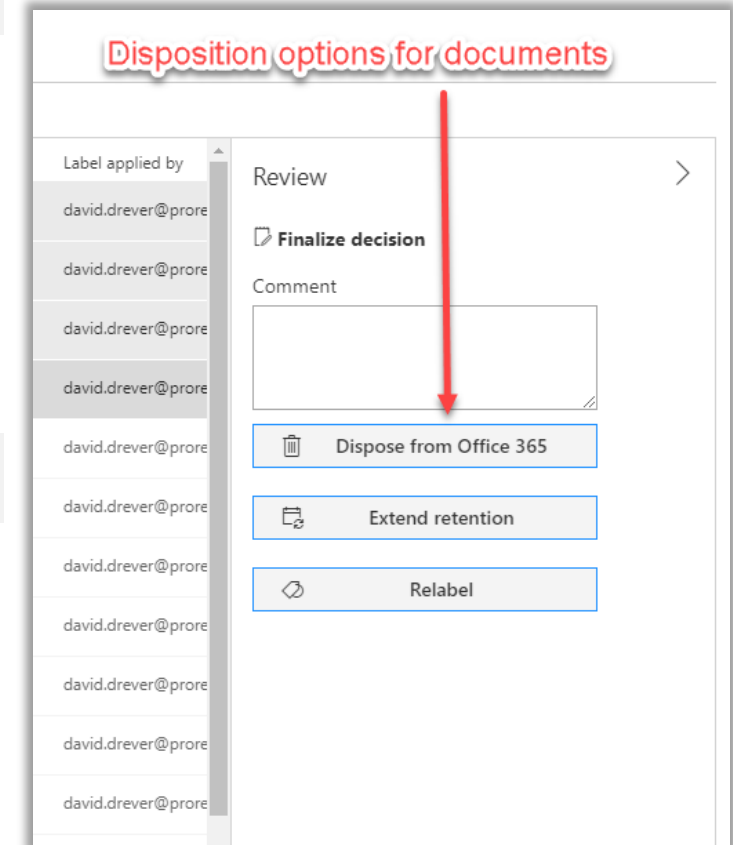
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# RECORDS IN MICROSOFT 365

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## Record Attributes

- Cannot be permanently deleted
- Cannot be modified
- Cannot be changed
- Cannot be removed
- Label can only be removed by Site Collection Administrator



## Important Things to Remember about Records

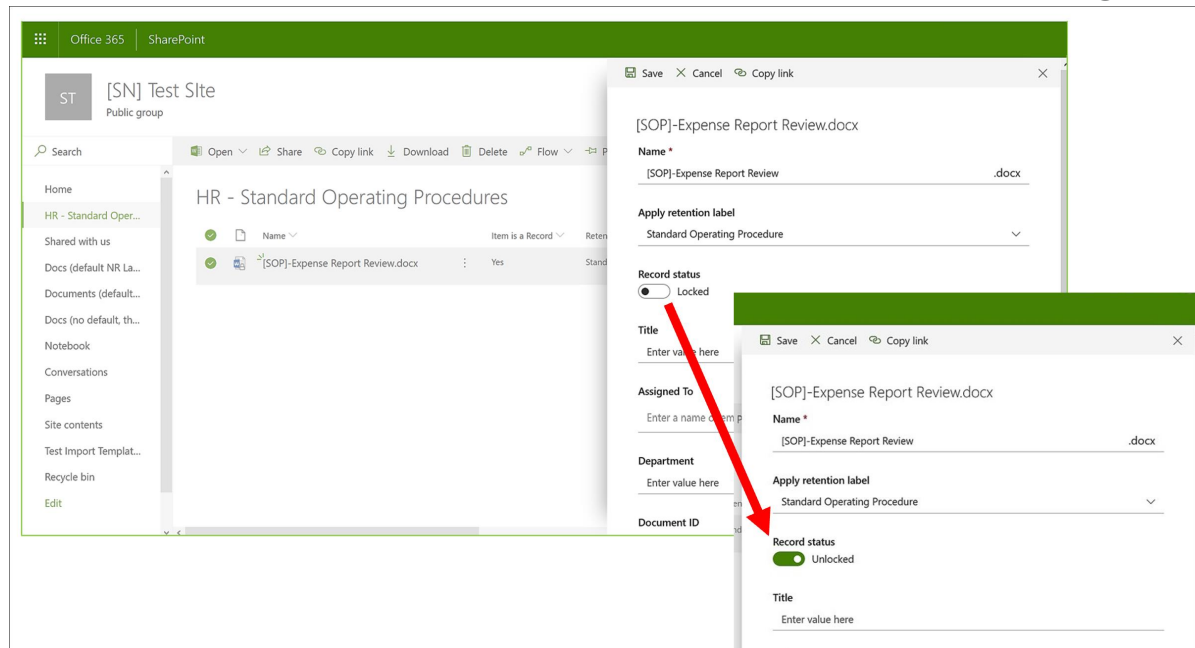
- Anyone with the ability to update content can add a record label to the content.
- If a document is moved into a folder that has a record label as the default label; the document will become a record. If the document is moved outside of the folder, it will still be a record.
- Deleting has different outcomes based on where the content is stored:
  - SharePoint: Documents that are records cannot be deleted.
  - OneDrive: Deleted from location but moved to Preservation Hold library.
  - Exchange: Deleted from location but moved to Recoverable Items folder.

# RECORDS IN MICROSOFT 365



## Record Versioning

- Allows a document declared as a record to be modified
- Requires the user to unlock the record for editing
- Doesn't update the record retained each time document is saved
- New version of the record is retained once document is locked again



# RECORDS IN MICROSOFT 365

The screenshot displays the Microsoft 365 SharePoint interface. The top navigation bar shows 'Office 365 | SharePoint'. The main content area is titled '[SN] Test Site' and 'Public group'. A search bar is visible. The left sidebar contains navigation options: Home, HR - Standard Oper..., Shared with us, Docs (default NR La..., Documents (default..., Docs (no default, th..., Notebook, Conversations, Pages, Site contents, Test Import Templat..., Recycle bin, and Edit.

The main content area shows a list of documents under the heading 'HR - Standard Operating Procedures'. A table lists documents with columns for Name, Item is a Record, and Reten. The document '[SOP]-Expense Report Review.docx' is highlighted, with 'Yes' under 'Item is a Record' and 'Stand' under 'Reten'.

Two dialog boxes are overlaid on the right side of the screen. The top dialog box is titled '[SOP]-Expense Report Review.docx' and contains the following fields:

- Name \***: [SOP]-Expense Report Review .docx
- Apply retention label**: Standard Operating Procedure
- Record status**: Locked (indicated by a radio button)
- Title**: Enter value here
- Assigned To**: Enter a name of em p
- Department**: Enter value here
- Document ID**: en

The bottom dialog box is also titled '[SOP]-Expense Report Review.docx' and contains the following fields:

- Name \***: [SOP]-Expense Report Review .docx
- Apply retention label**: Standard Operating Procedure
- Record status**: Unlocked (indicated by a radio button)
- Title**: Enter value here

A red arrow points from the 'Record status' field in the top dialog box to the 'Record status' field in the bottom dialog box, indicating a change from 'Locked' to 'Unlocked'.

# AUTO ASSIGNING MICROSOFT 365 LABELS

# MICROSOFT 365 AUTOMATICALLY ASSIGNING LABELS

Microsoft 365 allows for labels to be assigned manually, but to provide a better user experience automating this can be done (if you have E5 licenses)

## Based on sensitive data within content

- M365 will scan documents for content that meets criteria based on sensitive information.
  - M365 contains over 100 pre-defined sensitive information templates
    - Financial information like credit card numbers.
    - Personal information like driver's license or passport information.
    - Can create a custom combination of sensitive information based on your needs.
- Based on keywords within the document or metadata assigned
  - Common method is to apply based on content type or if specific words are close together

- Near natural language
- Common, easy to understand operators like AND, OR, NOT, or NEAR
- Examples:
  - contenttype:accountspayable AND "Protiviti"
  - Train NEAR(N=7) Maintenance

## Utilizes the Keyword Query Language (KQL)



# EVENT BASED RETENTION

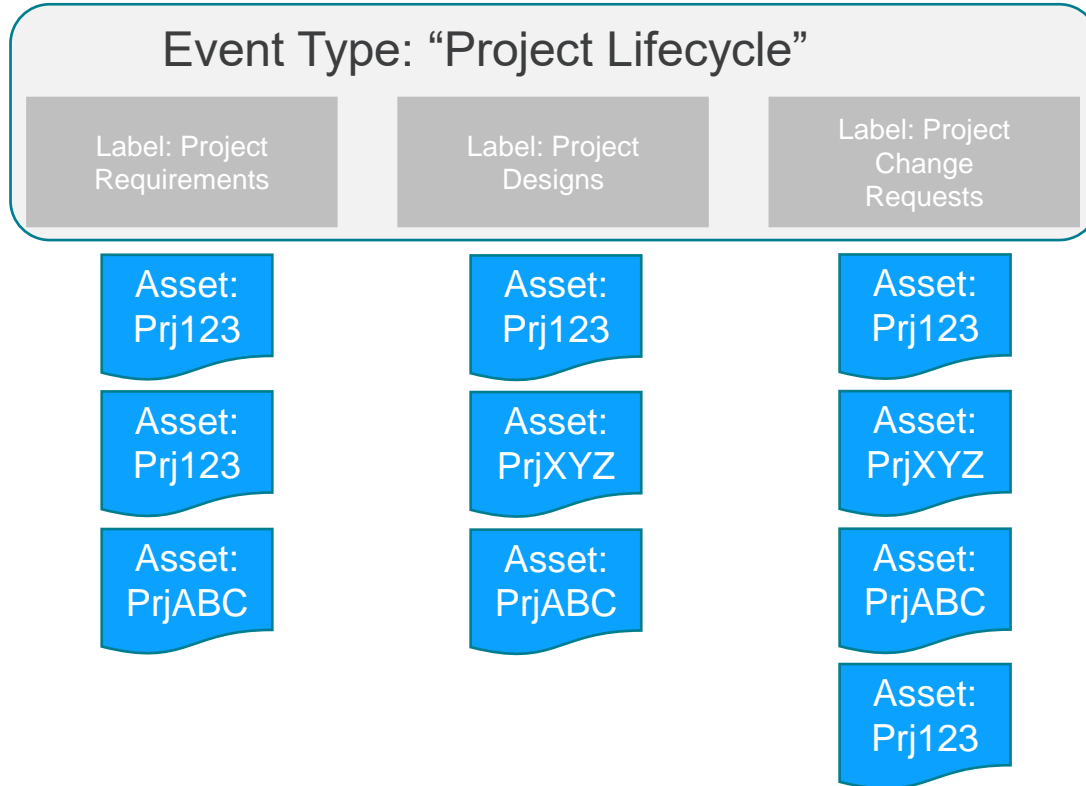
# MICROSOFT 365 EVENT BASED RETENTION

- Microsoft 365 is not limited to date-based retention. Microsoft 365 allows for retention policies to be applied based on events within the lifecycle of a document and not just based on the criteria when a document is created or modified
- Event based retention bridges the gap when applying a label can't depend on the created or the modified date.
  - Fiscal Year Ends
  - Project completion
  - Contract Expiration
  - Superseding of existing documentation.
- Commonly used to declare records within an organization
- Event based labels have the same capabilities/features as date-based labels.

# MICROSOFT 365 COMPONENTS OF EVENT BASE RETENTION

- **Event Type**
  - A description of a concept to describe an event within the lifecycle of a document or series of documents
  - No special functionality attached to an event type. Is used as a container for event labels
  - An event type can be linked to multiple event labels
- **Event Label**
  - A label within Microsoft 365 with retention processes enabled.
  - Retention is applied based on an event (not date or when label is applied).
  - Associated with an event type
- **Label Policy**
  - Pushes the event label (and any other labels that are related) to the locations they need to be applied

# MICROSOFT 365 EVENT BASED RETENTION HIGH LEVEL PROCESS



- Event Type Created – Project Lifecycle
- Event Labels Created and Linked to “Project Lifecycle”
- Documents Added within SharePoint and OneDrive with one of the three labels for “Project Lifecycle” assigned.
  - Can be anywhere that the labels have been applied to.
  - After label is added, Asset is set for the document.

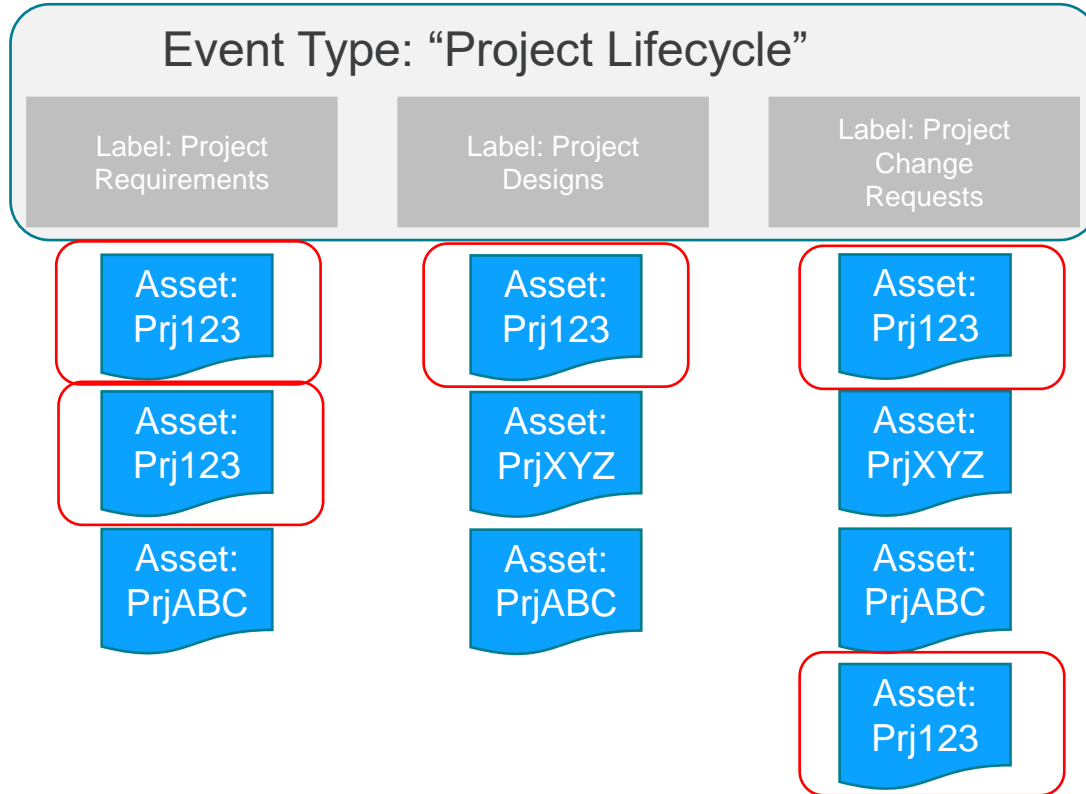
# MICROSOFT 365 EVENT BASED RETENTION HIGH LEVEL PROCESS

## Event Type: "Project Lifecycle"

Prj123 completes -> Event for Prj123  
occurs against Project Lifecycle

- The Project ends so the Records Manager declares a Project Lifecycle Event to have occurred in M365
  - The AssetID Prj123 is set in the event.
- **NOTE: If the asset is not declared the event will fire for ALL documents with the Project Lifecycle group of labels assigned.**

# MICROSOFT 365 EVENT BASED RETENTION HIGH LEVEL PROCESS



- Retention Process kicks off for each document with Prj123 assigned to it.
- Retention is based on the label the document belongs to.
- **When the event is created a date is to be entered. This date indicates the start time of the event.**

# MICROSOFT 365 AUTOMATING EVENT BASED RETENTION

Because of the frequency of common business events, manual execution of events can be very time consuming. When patterns are realized automation becomes possible. Automation of event creation allows for great strong efficiency applying retention policies within the organization.

**Free organization's staff to complete other important tasks**

- Automating event retention ensures the responsibility doesn't consume employees' time and frees them up to other important responsibilities.
- Increases efficiency as multiple teams no longer have to communicate to have policies triggered.
  - For example, Management doesn't have to instruct HR to retain a terminated employee's documentation. It can be done automatically with no intervention

- Tools to implement the auto retention policies are already provided within your Office 365 tenant.
- Integrate with other systems to create customized solutions
- Retention policies can be applied to documents in SharePoint, OneDrive and/or Exchange

**Utilizing Tools Provided By Microsoft to Automatically Start Retention Based On An Event**



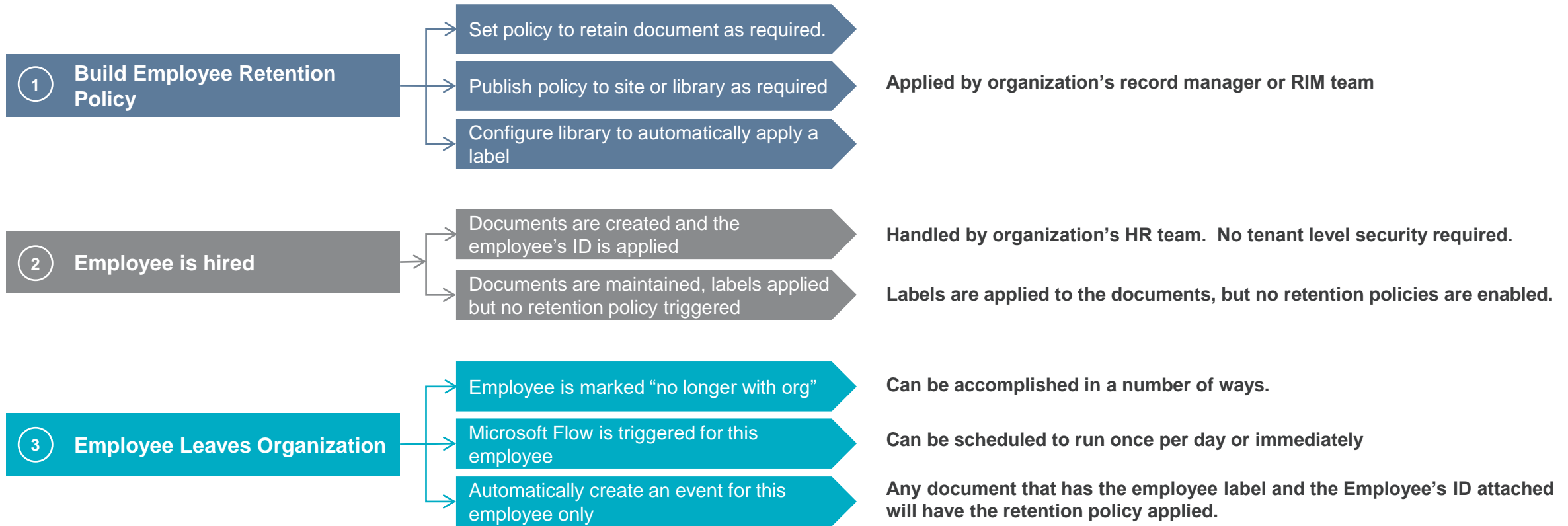
# “REAL WORLD” APPLICATION

How does automated event based retention work in “real world” situations?

# EMPLOYEE ON-BOARDING AND OFF-BOARDING

## Maintaining an employees' records based on their off-board date

In most organizations, document retention for employees is not initiated when they begin, but instead when they leave.



**No Manual Process Required to Initiate Document Retention!!!**

# THANK YOU



Organizers, Sponsors and You for making this possible.



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