



When the Conversation Becomes the Record

No CIO has signed a policy making chat the official system of record. In practice, that is what has happened. Engineers work through architecture questions in channels because that's where they already are. Budget calls get settled over direct message because it's faster than getting everyone on a call. Vendor decisions close in threads mid-conversation, because the context is right there. In regulated industries and 24-hour operating environments — energy, financial services, transportation — the dependency runs deeper: incident coordination, contractor communication, decisions made across sites and shifts. None of it registers as record-keeping. It registers as getting things done. Most organizations don't notice how much of their operational decision-making now lives exclusively in chat until something forces the question — usually after it has already been asked by someone else.

The Compliance Creep

Legal and regulatory frameworks don't distinguish between where a decision was documented and whether it was. If business happened in a messaging platform, those messages are business records — subject to the same retention, preservation, and production requirements as email. Since 2021, the SEC has collected over two billion dollars in penalties for failures to preserve electronic communications, chat included.

Federal agencies received the same signal: messages created in the course of agency work are federal records, whatever platform carried them. What a team experiences as a quick coordination thread, a regulator reads as evidence. That gap between how chat is used and what it has become is where the exposure lives.¹

Recognition Signals

Collaboration platforms didn't start as systems of record. They became them, gradually, as decisions moved into channels and stayed there. Regulators and courts have caught up. Chat data is now routinely requested in audits, investigations, and litigation — and its absence raises questions. Financial regulators updated their expectations to include digital communications. Courts have required message threads to be produced in context, not as isolated extracts.

Federal records rules apply wherever agency work is conducted, regardless of platform. Most organizations haven't updated their records practices to match what their platforms have become. In environments where distributed teams are known to operate through chat, the absence of records has started to raise as many questions as the records themselves.²

A few signs make the gap visible.³

- **Chat was never just conversation.** What began as a place for quick comments became the place where business actually operates. Strategies are debated there. Decisions are made there. Approvals happen in threads. All of it is preserved, searchable, and timestamped inside collaboration platforms. That shift carries weight. Courts and regulators have already recognized what many organizations are still catching up to: chat is a business record. When litigation, audits, or regulatory scrutiny arrive, collaboration platform data is discoverable and must be produced in full context, not as screenshots or isolated excerpts, but as complete conversations with the surrounding thread intact. By the time a subpoena arrives, what the platform was originally purchased for or how it was

configured at deployment is beside the point. What matters is what was said, what decisions were made there, and whether the organization is prepared to explain, preserve, and defend it. The way organizations communicate has permanently changed.

- **Retention settings haven't been reviewed since the platform was deployed.** Default configurations on most collaboration tools were built for short-lived communication, not records management. Organizations that haven't revisited those defaults tend to find two problems at once: data they were supposed to delete is still there, and data they needed to keep is gone.
- **Legal or compliance can't produce message-level exports on demand.** A litigation hold or regulatory request requires specific conversations, intact, with the metadata showing who said what and when — including edits and deletions. Without that capability, a straightforward compliance task becomes an emergency.
- **The chat platform sits outside the scope of enterprise records governance.** In many organizations, the teams managing email retention, document holds, and eDiscovery readiness have no visibility into the collaboration platform. That's not a communication problem between teams. It's a records gap that gets bigger every quarter. For IT platform owners, it shows up differently: a platform procured for productivity is now carrying compliance weight it was never configured to hold — and the first sign is usually a legal request, not a roadmap conversation.

Wrapping It Up

Whether chat has become a system of record isn't a question of intent. It's a question of what's actually in the platform and whether it can be produced, explained, and defended. The organizations ahead of this are the ones that didn't wait for the question to arrive from outside. Worth asking now: if this conversation becomes evidence, could you explain it — and defend it — six months from now?

¹ U.S. Securities and Exchange Commission. (2025, January 13). [Twelve firms to pay more than \\$63 million combined to settle SEC's charges for recordkeeping failures.](#)

² CloudNine. (2025, September 15). [When chat becomes evidence: Legal cases involving Slack, Teams, texts, and messaging apps.](#) eDiscoveryDaily.

³ National Archives and Records Administration. (2023, October 23). [NARA Bulletin 2023-04: Managing records created on collaboration platforms.](#)



Not sure where your organization stands? Mattermost's readiness assessment helps security, IT, and legal leaders identify where chat has crossed into system-of-record territory — and what's required to close the gap.

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