



Implementing a Records Disposal Program

For the South Australian Government, records disposal can be defined as a range of processes by which official records of agencies are destroyed, retained or transferred between agencies. It determines whether the records are of permanent or temporary value and for how long temporary value records need to be retained.

What is a records disposal program?

The basis of an agency's records disposal program is found in the regular and managed application of General Disposal Schedules (GDS) and Records Disposal Schedule (RDS), which specify retention periods for official records. It calls for regular and consistent sentencing of records in line with current and approved disposal schedules relevant to the agency, the recording of appropriate disposal decisions and the application of disposal actions indicated by a disposal schedule. A good disposal program will be regularly reviewed and will cover all of an agency's official records, including records located offsite.

Benefits of a records disposal program

The benefits of a records disposal program include:

- identifying records of permanent value and ensuring they are preserved
- reducing agency storage costs, achieved by destroying records due for destruction and the transfer of permanent records to State Records
- using limited office and server space efficiently and effectively
- improving access to records to support business and community needs
- reducing risks to agencies through efficient access to records for the purpose of Freedom of Information Act (FOI) requests, subpoenas, discovery orders etc.

Before commencing a records disposal program

At a minimum, agencies need the following before commencing a disposal program:

- current and approved disposal schedules
- adequate resources and facilities.

Disposal schedules

In accordance with section 23 of the *State Records Act 1997* agencies must not dispose of official records except in accordance with a determination made by the Director of State Records and approved by the State Records Council. These determinations take the form of disposal schedules.

A disposal schedule is a systematic listing of functions, activities and related records that determines a retention period and associated disposal action. It is through the use of disposal schedules that records are deemed to be of either temporary or permanent value.

General Disposal Schedules (GDS) cover functions common to a number of agencies, for example *GDS 15 for State Government Agencies in South Australia* and *GDS 20 for Local Government Records in South Australia*.

Operational Records Disposal Schedules (RDS) are developed to cover records specific and unique to an individual agency.

A combination of disposal schedules may need to be applied when sentencing records.

It is important that agencies review their records to determine which disposal schedule/s are relevant and ensure these schedules are current prior to commencing a disposal program.

Resources and facilities

In accordance with the *Adequate Records Management Standard* (as amended), agencies must assign responsibility for records disposal.

Staff used for the development of a disposal schedule need to be adequately skilled and experienced in business and legislative analysis, records appraisal and schedule development using the State Records' template.

Staff used for the sentencing of records need to be adequately trained, skilled and experienced in sentencing techniques, disposal procedures and relevant State Records' requirements.

Suitable staff for records disposal may be found either in-house or through a service provider. The upskilling of staff may be required and may involve in-house training by the Records Manager or through specific disposal training courses.

Adequate facilities are required to carry out disposal work, including large tables, computer and telephone access, equipment for moving and shelving of records, secure areas for confidential files, temporary shelving or pallets. Facilities must have adequate lighting and ventilation, and enable records to be kept in a secure, safe and stable environment.

Components of a records disposal program

The major components of a disposal program include:

- development of disposal plan
- implementation
- regular monitoring and review.

Development of Disposal Plan

The planning stage for any records disposal program is vital for its success. Contact should be made with the departmental records management unit or Records Manager early during the planning stages of the records disposal program. If the agency does not have a records management unit or Records Manager, contact State Records (Email: srsaRecordsManagement@dpc.sa.gov.au).

The development of a disposal plan only needs to occur once but should be reviewed and updated as required. Following planning, sections of the disposal plan can be implemented in phases.

The steps to be undertaken during the development of a disposal plan may include:

- conduct a survey of the records holdings, including hard copy, electronic and hybrid records and the systems within which records are stored (eg EDRMS, shared servers, line of business systems, legacy systems, etc)
- locate lists of temporary records that are stored offsite
- identify and document records that are not covered by a current disposal schedule and remain unsorted
- examine the processes in place for managing records disposal
- develop an implementation plan that includes:
 - program objectives and scope
 - identification of disposal schedule/s to be used
 - timelines and milestones
 - identification of required resources
 - identification of appropriate facilities
 - identification of potential risks and measures to mitigate those risks
 - identification of the benefits of the program
 - identification of reporting channels – to whom and how often
 - identify processes to monitor the quality of sentencing work
 - arrangements for endorsement of the program by senior executive
 - establishment program policies and procedures.

Implementation

Implementation of the disposal program is an ongoing exercise. It will occur as often as is specified in the disposal plan. Aspects of implementation may only need to be carried out once, eg the establishment of procedures, where others will occur on an ongoing basis, eg sentencing.

During the implementation phase, agencies need to ensure the following occurs:

- Identify the scope for the phase of implementation being undertaken
- Sentence records
 - identify records to be sentenced
 - ensure all disposal schedules are current and that procedures, guidelines and policies relevant to the act of disposal are available
 - sentence records identified using current schedules
 - identify and develop new RDS/s as required to cover those records that fall outside of current schedules
- Disposal of records

Once records have been sentenced it is time to arrange the records for disposal. The records need to be arranged and described on a records description list (RDL) or consignment list as determined by the archival value of the records, then boxed appropriately.

Permanent records – records identified as permanent need to be arranged and described on a records description list (RDL) and boxed according to State Records requirements. Permanent records must be transferred to State Records when they are no longer required for business purposes or when they reach 15 years, whichever occurs first.

Temporary records – records identified as temporary need to be transferred to an approved service provider. Records need to be arranged and described appropriately prior to transfer. Copies of consignment lists need to be retained by the agency for retrieval purposes.

Records due for destruction – records identified as due for destruction must be described on an Intention to Destroy Records Report (ITDRR). The report must be submitted and approved by State Records, who will in turn notify the agency of their approval, prior to the secure destruction of records.

- Processing of unsentenced records

The appraisal and disposal of unsentenced records needs to be planned for. Record disposal schedules need to be identified and developed where appropriate.

Depending on the quantity and complexity of unsentenced records, agencies may prefer to store these offsite while disposal schedules are prepared and approved for use. If an

agency wishes to transfer unsentenced records offsite with an Approved Service Provider (ASP) the agency is required to seek approval in writing from State Records. Due to the risk, approval in the form of an exemption will only be given on a case-by-case basis.

- Seeking Exemption to transfer unsentenced records to ASP

In approving the transfer of unsentenced records, State Records must be assured that such records will be stored appropriately and processed in a timely manner. Therefore, an agency is required to provide State Records with sufficient details about the type and quantity of unsentenced records to be sent to an ASP. A minimum list of criteria to be met by the agency is available in the Management and Storage of Temporary Value Records With an Approved Service Provider Guideline (2011, Version 5).

It is important that steps are taken to prevent further backlogs. Agencies need to identify records management work processes to reduce the likelihood of backlogs resulting in the future such as scheduling routine sentencing projects throughout the year.

- Review of Implementation
 - identify necessary steps to check for the quality of sentencing and disposal activities
 - spot check boxes of processed records for adequate sentencing
 - create an issues log to document common queries/problems
 - assess the records management control systems at regular intervals to identify gaps in processes.

Monitoring and review

The records disposal program needs to be monitored regularly, including the evaluation and assessment of its effectiveness. Policies and procedures need to be updated where appropriate. In addition, it is important to identify which RDS' need to be developed and which schedules are due for a review. These will need to be addressed prior to future implementation phases taking place.

Ongoing evaluation is recommended to allow for the opportunity to highlight the disposal programs achievements and challenges. Having a good understanding of the effectiveness of the program will assist with reporting to senior executive on the outcomes and making any adjustments to the process prior to subsequent implementation phases occurring.

Further information

- State Records of South Australia, *Adequate Records Management Standard* (amended).
- State Records of South Australia, *Recordkeeping Advice Sheet RK042: Appraisal and Disposal*
- State Records of South Australia, *Recordkeeping Advice Sheet: RK 043 Management of Hybrid Files*

- State Records of South Australia, Records Disposal Schedules.
- State Records of South Australia, *Appraisal of Official Records: Policy and Objectives*.
- State Records of South Australia, *Resentencing of Records Guideline*.
- Public Record Office Victoria, *PROS 10/13 Implementing a Disposal Programme Guideline*.

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Version control

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