Information Management Advice 54 Records Management Toolkit for Local Government

FACT SHEET 4 - Basic Records Management - Disposal Management

Introduction

This Fact Sheet is part of a sub-set of Advice 54, and focuses on the operational procedures of a records management program. Some templates are provided to assist agencies to establish and implement recordkeeping controls and procedures. Agencies with very small records operations, those who do not have dedicated RM resources, and those who have not yet implemented specialised EDRMS software, may find these Fact Sheets particularly beneficial.

Records program operations

Daily operations are the basis for the development of a procedure manual for the records team. This promotes consistency of process, and information sharing, in the event of new staff, volunteers or contractors. Procedure manuals should be regularly reviewed and updated as required to allow for organisational and procedural change. Whether paper or electronic recordkeeping systems are in place, key functions include:

- Record identification
- Record capture
- Registration
- Indexing
- Classification
- File creation and closure
- Distribution & tracking
- Search & retrieval
- Access
- Security
- Storage
- Scheduling, retention & disposal
- Records transfer
- e-discovery & Disposal Freezes
- Vital Records
- Disaster Management
- QA & Auditing
- Monitoring (program, processes and people) & reporting on activities, performance and compliance
- Resourcing

Tools you will need

If your system is paper-based consider:

- Stationery (pencils, markers, paperclips, file ties etc)
- File register (spreadsheet or book)
- Disposal Schedules (DA2200 plus DA2158, DA2159, DA2135 and DA2101)
- Register of Records Destroyed
- Acid free archive cartons
- Disposal/transfer documentation template as required
- Secure destruction service or processes (eg. security shredding bins)

If your system is electronic or hybrid consider:

- Appropriate permissions for disposal management
- Stationery (pencils, markers, paperclips, file ties etc)
- Disposal Schedules (DA2200 plus DA2158, DA2159, DA2135 and DA2101)
- Register of Records Destroyed
- Acid free archive cartons for physical records

Scheduling, retention & disposal

The disposal of records includes the retention, deletion, transfer or destruction of records following appraisal decisions. Disposal processes include:

- *Appraisal* – appraising business functions and activities to determine whether records need to be made, which of these records need to be retained and for how long. This includes identifying records with on-going value as archives. In Tasmania appraisal decisions are authorised by TAHO through Retention & Disposal Schedules, and Destruction Authorities.
- *Sentencing* – applying retention decisions and disposal actions to records. This includes documenting sentencing activities, including transfer and destruction.
- *Destruction* – the safe, secure and authorised destruction of time-expired records. This includes documenting records destroyed and the authority by which they were destroyed.
- *Arrangements* - for adequate storage and retention for those records which need to be managed on an ongoing basis.

Agencies with paper-based filing systems face different challenges to agencies who have implemented electronic recordkeeping systems.

Traditionally, paper files are often sentenced at the file level, rather than individual document level. Where file content has not been rigorously maintained, this can be problematic when scheduling and attempting to select an appropriate retention reference from the Schedule. This is particularly true of Property files, where large numbers of documents reflecting disparate activities with varying retention requirements get filed. It can also be true of Subject files, where various items may be loosely linked together for convenience - “Liaison” files are a particularly good example. Accepted practice has been to routinely review and ‘cull’ short term documents from these files to maintain a core group of records with enduring business value. In more recent times, with limited time and resources available, this usually translates into locating the document on file with the longest retention period, and applying that retention to the entire file to ensure retention is covered for all documents.

Unfortunately, the result is a multitude of short term value items unnecessarily stored, clogging up access to items of real value!

A recommended approach is to create a function-based filing system, whether in an EDRMS or paper based environment. Creating files and structuring information based on related functions and activities of the business, results in both improved access to, and management of, the captured information. Grouping related records together in this way also streamlines the process should any business function (and related records) need to transfer to another agency or organisation.

Agencies should have a routine disposal program in place. Depending on resources and size of the agency (and volume of information), this may be quarterly, half-yearly, or annually. Your agency's information asset register will assist in locating additional records outside of those in secondary storage (whether in-house or at a commercial storage provider), that may be due for appraisal/disposal or transfer. EDRMS systems with retention/disposal capability should be able to produce reports for circulation to staff, prior to destruction authorisation. Similarly, your storage provider should be able upon request to produce a report of items due for destruction. You may like to formalise this process to coincide with your disposal program, so you can circulate a single combined report of all items that are due for disposal.

In paper-based environments, sentencing is usually done at file closure, with a review undertaken of file content to determine an appropriate retention and disposal action (refer to the relevant TAHO authorised Disposal Schedule, such as the *Disposal Schedule for records of Local Government DA2200*). Those files that contain permanent records will transfer ultimately to TAHO as State Archives. Largely due to resourcing issues, agencies may find the lack of a regular program of file 'culling' of short term value or temporary records, will result in a large number of legacy files that are being kept by virtue of a small number of permanent and/or high business value records.

In those agencies who have introduced an EDRMS, it is recommended that sentencing is performed at the document level prior to scanning, or during the registration process itself (if the system allows). This not only familiarises records staff with the Disposal Schedule, particularly for common or routine records, but will assist in ensuring the correct retention is applied when the time comes for disposal. Depending on the EDRMS system design, retention may be applied at file or document level – either way should enable a report to be run to identify documents due for destruction, or transfer to TAHO. When compiling the design requirements of an EDRMS system, the capacity for classifying documents and thereby adding sentencing information to the document metadata (rather than a blanket 'virtual file level' approach) should be considered. Many EDRMS systems apply retention to the file, rather than the individual documents within it, and this runs the risk of records being linked to the 'wrong' file, inadvertently sentencing (and potentially destroying) the record incorrectly. This is particularly true when general staff are registering items to the EDRMS, and may not have the same interpretation of the file name, or the context provided by the file plan or business classification scheme. For this reason, records staff will need to perform strict audits on destruction/disposal reports before circulation to staff to comment, to ensure appropriate retentions have been referenced.

When disposal is undertaken, all destroyed records must be added to the Register of Records Destroyed maintained by the agency. This is a record that is retained in the agency, and accounts for all the records that have been destroyed in accordance with a destruction authority or formal disposal schedule. Agencies are required to produce a copy of their Register of Records Destroyed to TAHO upon request for review.

Records transfer

Transfer of records includes physical movement; or transfer of custody arrangements (to another agency – transferring control of records to new owners or custodians following the transfer of functions). It can also apply to the transfer of permanent State records to TAHO. It includes the documentation of records that have been transferred, as well as the physical handover.

You may need to move records for a number of reasons. These include:

- taking records offsite for business reasons
- transferring records to court or to the solicitors
- moving records between storage locations, e.g. in-house to commercial secondary storage
- transferring records required as State Archives to TAHO
- moving inactive records ready for destruction to the place where they will be destroyed.

You may need to move records as a result of other occurrences. When functions are taken over by another agency for example, either or both a Transfer of Ownership and Transfer of Custody authorisation may need to be obtained from the State Archivist. Typically, the provision for transferring records between agencies will be mandated in legislation (eg. the creation of the Tasmanian Water Authorities and the associated orders), however there may be times when the provisions for managing records is unclear, or absent. If you are not sure, contact TAHO for advice.

If you are…	**Refer to…**
Amalgamating with another agency	TAHO Guideline 3 – *Managing records of State and local authorities being abolished or amalgamated*
Transferring State Records to TAHO	TAHO Advice 12 – *Preparing hard copy records for transfer to TAHO*
Destroying records	TAHO Guideline 21 – *Approved destruction methods for State records*
Privatising business functions	TAHO Guideline 14 – *Privatisation of Government Business – Recordkeeping Issues*
Migration of digital records between systems	TAHO Advice 37 – *Keeping Digital Records Accessible*
Transferring custody of personnel records to another agency	TAHO Guideline 16 – *Managing Inter-agency transfer of Personnel records*

When records are in transit they are more vulnerable to loss, damage or theft. Security precautions should be taken to minimise these risks. If you use contractors or couriers to move records, you need to make sure you include security and confidentiality requirements in the contract. If records are being delivered to another location, make sure they can be easily identified and that they won't get lost. Label each box or envelope clearly. The records should be sent to a named individual and delivered directly to the person to whom they are addressed. For more security, they should be signed for on receipt.

Some things to consider when moving records are provided below. There may be other recordkeeping issues specific to your circumstances. If in doubt, contact TAHO via gisu@education.tas.gov.au for advice.

General	
	Update records control systems to show the new location of the records
	If records are being destroyed, document this in your records control system
	Make sure that records are delivered directly to a named individual
	Make sure that a receipt of delivery is signed off by the named individual or another appropriate, delegated individual
	Check that records have reached their destination.
Packaging	
	Files or documents – sturdy envelopes or satchels
	Electronic discs – Bubble wrap or disc container before placing in envelope or satchel
	Large quantities of records – archival boxes or cartons, or other appropriate containers. Make sure you have a contents list for each box.
Handling	
	No eating, drinking or smoking near the records
	Boxes and envelopes should not be opened or examined without authorisation from the relevant authority
	Records should not be thrown or treated roughly
	Records should be packed carefully to minimise movement and possible damage during transit
	Records should not be left in unsecured areas
	Records should not be left in unlocked vehicles
Mail/Courier	
	Registered, certified mail options
	What are the track/tracing services available? Is a signature required?
	Are records protected from damage, unauthorised access, theft?
	Is the level of security appropriate to the degree of sensitivity, importance or confidentiality of the records?
Transportation	
	Vehicles must be covered, locked, attended at all times, and not used for transporting other materials such as chemicals that may pose a risk to records
Weather	
	If records can't be kept dry – don't move them. If they get wet, they can be costly to dry and repair
	Don't indemnify contracts/couriers who are moving your records. If the records are damaged in transit, they will need to be liable for the cost of conservation work
	Records should always be enclosed in suitable padding or containers to prevent or minimise damage, and protect from rain and weather
	If storage is required prior to transit, ensure they are in a secure location. Don't leave out on the pavement or in a corridor or public area waiting for collection
	Make sure each box/container is adequately labelled
	Do not leave records sitting outside buildings on wet or potentially rainy days

	A suitable covered vehicle should be used for moving records between locations.

Management of Legacy Records

Many agencies have large numbers of legacy records in paper based filing systems as they move to EDRMS environments. These may be accumulations of their own records, or of records inherited from other agencies due to a transfer of functions, or amalgamations. Even when created by a former agency, the inheriting agency becomes responsible for their ongoing management.

Back scanning of historic files (opened post-1960) allows for disposal of many source records under DA2159, which is often seen superficially as a way to address physical storage issues, and improve accessibility for staff, as they will no longer have to visit the Records area to collect a file. The perception of a 'quick win'– information available at the fingertips – frequently overrides a formal assessment of the associated costs, resource requirements, and genuine return on investment to the business longer term.

As discussed earlier, the lack of routine culling and disposal programs can result in significant space requirements, and associated costs – both in staff hours and physical storage. Similarly, a lack of structured file plans that have not been implemented well or strictly adhered to (or are simply poorly designed and misunderstood) can result in a cross-section of information made up of records that are out of order, misfiled or at worst, completely unrelated. The technological answer is often to just 'back scan everything' into a single multi-page electronic file, however this approach is not recommended – it simply moves the problems from a physical environment to an electronic one.

Determining which files to convert is an exercise involving their usage, your resources, and your project budget. If budget and time are not a consideration, converting everything *may* be an option. Many agencies realize that this is not feasible because some documents are seldom accessed or may be nearing the end of their retention period. It does not make good sense to invest money and time to convert a series of documents, and ingest them into an EDRMS, only to delete them within a year or so. On the other hand, permanent retention documents that require ongoing storage, and those identified as vital records should be converted, as they would also form part of the agency disaster recovery plan. **Ultimately the decision to 'back scan' legacy files should be driven by business need, and consideration of longer term value of the records involved**.

Basic strategies for conversion when implementing an EDRMS are:

Full Conversion A full backfile conversion converts all existing documents and pre-loads the system prior to going live. "All documents" should be those documents that should be in the EDRMS, whether they are active working documents or archived documents that are still within the official retention period, and vital records. Note that there are several things that need to be considered when undertaking a back scanning project on legacy files, to ensure both money and effort is not wasted. See TAHO *Advice 30 Digitisation Dilemmas* for important information if you are considering this approach.

Partial Conversion. A partial conversion allows you to designate only certain documents to be converted. For example, only the most recent documents that are still considered works-in-process will be converted. This allows you to limit the total number of documents for the initial conversion effort, while still allowing you to make a second conversion effort, if it is required and time and budget permit. Another common approach is to convert all documents back to a certain date, such as for a calendar year.

Day Forward. Day forward conversion starts with only the new documents received once the system goes live. (This is not a backfile conversion since only new documents are being scanned).

On-Demand. An on-demand conversion means that no historic documents are scanned but when a document or file is requested and pulled from the file room or archive, it is scanned and the digital image is then provided to the requestor.

Combinations of the strategies described above are employed by agencies, based on time, resources, and budget. In order to assist agencies, TAHO have produced a checklist for initial consideration when considering backscanning of legacy property files, see *Appendix 1* of this Advice.

Whichever strategy is selected, the agency must incorporate plans for the ongoing management of any historic hard copy files not converted, including arrangements for culling of short term value records, and retaining only permanent State records, and those required for business needs.

If you are not yet in the market for an EDRMS, a review of your legacy files can still be undertaken to start addressing any issues identified. If you have not undertaken disposal previously, a review of your file register and holdings is in order. TAHO also run disposal procedures training for those staff who have not previously been responsible for disposal – see our website for more information.[1]

A systematic approach is best – don't allow yourself to become overwhelmed by the magnitude of the task! File movement sheets are a good way to identify whether items are still 'actively' used – if you don't have these in place, start a small project adding them to files now. Take a look at the names of your files - do you have a naming convention where files include the financial year? If so, previous years should have their files clearly marked 'closed' with both an end date and appropriate retentions added to the file cover. A closed file sheet can also be added to the front of the file to remind staff not to add further information. Inactive files ideally should be moved to a 'secondary storage' area as they are closed, to enable monitoring for disposal/archiving activity. (See Fact Sheet 2 on File Management for templates).

The best approach is to list, circulate for approval from the relevant business unit, destroy and add to your Register those records that are easily identified as short term or temporary, past their expiry trigger and no longer required. Often agencies have stockpiles of invoices for example, cluttering up valuable storage space, which are well past their 'use by' dates. Get these items under control first, then move on to the more straightforward subject files (think of short term things like Dog registration, Kennel/Stable licences, Food permits, etc) that should contain single topics. This approach should make a considerable dent in your stock piles, provide you with some room to move, and boost your confidence. Easily identifiable permanent value records should be next (think Council Minutes etc) although they will not be destroyed, but rather set aside for listing and transfer to TAHO.

Property files are more difficult, as they frequently contain a myriad of record types with varying retentions – records related to each other only by their relationship to the property itself. For this reason, it is recommended that function-based 'topic' files are created where possible, which will gradually move much of the content away from property-based filing systems. Individual application files can be created instead, whether DA or BA files, or annual Dog Registration files, etc. Staff may not be as resistant to this approach as you might think, as they will not be required to search through "other people's records" to get to the information of interest or relevance to their job. Given their complexity, legacy Property files are generally an area that will

[1] www.linc.tas.gov.au

require a more formal project-based approach to address. See TAHO *Advice 29 Managing Legacy Records* for further guidance.

Recommended Reading

Guideline 3 – Managing records of State and local authorities being abolished or amalgamated

Guideline 4 – Agency determination of access restrictions

Guideline 12 – Preparing hard copy records for transfer to TAHO

Guideline 16 – Managing inter-agency transfer of personnel records

Guideline 19 – Digital Preservation formats

Guideline 21 – Approved destruction methods for State records

Advice 9 – Disposal of Scheduled Records

Advice 10 – Disposal of Unscheduled Records

Advice 12 – Preparing hard copy records for transfer to TAHO

Advice 29 – Advice for agencies managing Legacy Records

Advice 30 – Digitisation Dilemmas

TAHO Template – *AOT31 Register of Records destroyed*

TAHO Template – *AOT48 Application to Dispose of State Records*

TAHO Template – *Checklist for Disposal Authority for unscheduled records*

Appendices:

Legacy Records – *Property Files checklist* (Appendix 1)

Further Advice

For more detailed advice, please contact:

Government Information Strategy Unit
Tasmanian Archive and Heritage Office
91 Murray Street
HOBART TASMANIA 7000
Telephone: 03 6165 5581
Email: gisu@education.tas.gov.au

Acknowledgements

- National Archives of Australia
- Australian Standard AS ISO 15489.1 & Guidelines 15489.2[2]
- State Records NSW Guideline 18 and Recordkeeping in Brief 15 (no longer available)
- AIIM[3]

Information Security Classification

This document has been security classified using the Tasmanian Government Information Security classification standard as PUBLIC and will be managed according to the requirements of the Tasmanian Government Information Security Policy.

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All	All	Document imported into new template

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Ross Latham
State Archivist

[2] http://www.saiglobal.com/Information/Standards/
[3] http://www.aiim.org/community/blogs/expert/Backfile-Conversion-Boot-Camp

Appendix I - LG record types typically associated with historic / paper-based Property files

Below are some groupings of records commonly found on old paper Council property files, and their associated retention groups. Where 'back scanning' of legacy files is being considered, it may be useful to break down records into series - or 'chunks' of Permanent/temporary classifications - to allow for electronic capture (where this would prove beneficial to agencies for records of enduring value).

Note: some Councils may hold legacy building/plumbing and/or development application files separately from Property files (which is the ideal situation as it will minimise the permanent records likely to be held on property files). This list may differ from Council to Council depending on in-house recordkeeping practice – Councils may be more or less reliant on a 'property-centric' view, and some may have developed corresponding 'subject' files for managing some of these issues.

TAHO does not endorse the practice of scanning legacy files into a single 'multi-page' TIFF or PDF file (see TAHO *Advice 30 – Digitisation Dilemmas*). Whilst this may appear at first glance to be useful for search purposes for end users (as they can search the content of a multi-page file to locate key terms), EDRMS search functionality should be able to pinpoint key terms across multiple documents if those documents are scanned using OCR technology, irrespective of metadata or other classification controls applied.

TAHO recognises however, the administrative, financial and resource costs associated with back scanning and capture of legacy files as individual documents. Agencies can use the following guide to group record types according to similar retentions, to streamline appraisal and disposal activities for legacy records on property files, including eventual transfer.

Permanent Records (Eventual transfer to TAHO)

- Development Applications (planning)
- Building Appeals – precedent setting
- Building Applications – precedent setting or highly controversial; community, culturally or historically significant, innovative, heritage valued etc (see DA2200 02.02.02)
- Unsuccessful applications – controversial or precedent setting
- Building inspection reports
- Serious breaches of building compliance that result in court action
- Council & council committee/special committee **officer reports** (there *may* be **originals** on legacy files – usually relevant to Council owned property).
- Rates – properties determined to be rates exempt, requests for change of classification (and subsequent changes) that are precedent setting. Records of property seizure for rates recovery. Valuation objections where valuation is adjusted/disallowed.
- Property maintenance (council properties) – major maintenance, conservation work/fit-outs for buildings of local/state/national significance

Long Term Temporary (retained in agency until destruction trigger)

- Building/Plumbing Applications – non precedent setting, non-significant buildings & structures
- Building abatement notices – failure to comply with regulations (including instruction for remediation)
- Property maintenance (council properties) – record of pest & weed control programs using chemicals/herbicides; maintenance & repair of playground equipment including playground inspection reports
- Special plumbing permit applications (septic tanks)
- Certificates of title (originals)

Mid Term Temporary (7-10 years) - *may include vital records*

- Rates correspondence (objections to valuations that are not upheld, rates notices, etc)
- Financials
- 337 Certificates
- Animal Management abatement notices likely to result in infringement/prosecution
- Dog registration – dangerous dogs
- Building appeals – non-precedent setting
- Building/plumbing compliance – heating compliance certificates, backflow reports, etc
- Property maintenance (Council properties) – swimming pool water testing & air conditioning monitoring; parks, reserves & gardens maintenance (cemeteries)
- Rates – land valuation statements, reports on valuations, notice of property sale & transfer, successful applications for rates rebates,
- Work request forms from the public
- Private Work applications (plumbing)
- Health – Inspection reports where major issues are identified, outbreaks of illness, major controversy or serious infringements.
- Tree removal/lopping applications
- Property maintenance (Council properties) – disposal of hazardous material including removal of asbestos
- fire hazard abatement notices
- Council properties – disposal, sale, acquisition (except where relating to major resumption or acquisition of property considered of local/state/national heritage significance), lease/licence arrangements & enquiries, permissive occupancy agreements

Short Term Temporary (up to 5 years)

- Rates - Direct debit applications, pensioner remissions, unsuccessful applications for rate rebates, applications for postponement of rates, supplementary valuation lists, etc
- Dog registration
- 132 Certificates
- Animal Management complaints & inspection records in relation to complaints (unless proven & infringement issued)
- Animal Management notices unlikely to result in infringement/prosecution (barking dog, dog at large)
- Records of sale/hire of animal equipment (anti-bark collars, etc)
- Building minor works notifications (that do not require Council approval)

- Council & Council Committee/Special Committee Minutes (**copies only**)
- Low level community consultation correspondence (bulk mail outs regarding street issues, local park, etc)
- Enquiries for general information about Council products & services (is it ok for me to keep chickens here, what would I need to consider if I wanted to build a fence, etc)
- Minor complaints, suggestions
- Stormwater location inspections
- Permits – food business, regulated systems (cooling towers), place of assembly licencing, PHRA applications (public health risk activities), Skip bin applications, Wheelie & recycle bin applications/replacements;
- Animal management - complaints, inspection reports, registration, notices, kennel licences, stable licences
- Health - Abatement notices, Inspection reports – ASFA (routine), public health laboratory certificates (routine results), routine Inspection reports – WWTS (wastewater treatment systems)
- Property maintenance (Council properties) – minor repairs and routine maintenance; permits to use parks & recreation areas
- Notices of Sale & lease of crown land (rating purposes)
- Seepage & soakage investigations
- Heritage program correspondence