

Notes for reviewing Common Administrative Functions draft DAs

1. Feel free to consult as widely as you can manage within your organisation.
2. When consulting with non-IM staff it is often helpful to ask them to focus on the following:
 - a. Have we covered the whole function or are there gaps?
 - b. Whether the permanent records we have identified seem appropriate?
 - c. Whether the retention periods we have selected for temporary records seem appropriate?
 - d. Whether the triggers we have identified seem appropriate to the records?
3. Please ensure staff know that these are minimum retention requirements only for temporary records – the agency can keep them for longer if there is an agreed business need to do so. Exceptions to this are a) when Privacy legislation requires destruction of personal information when use (including retention for evidentiary reasons) has concluded, or b) a contractual or other legal agreement that specifies destruction following the conclusion of minimum retention requirements, or c) policy, directives, or other explicit formal instructions require destruction to promptly follow the conclusion of minimum retention requirements.
4. The disposal schedule applies to all formats and seeks to be future proof and past friendly – therefore we don't quote particular sections of legislation or name systems etc because these will date quickly as these things change/are updated. Note: the term 'records' also includes information, data and other forms of recording/capture e.g. film/video, photographs etc.
5. The first 8 or so pages of the disposal schedule is a pre-set template – we do not require you to review this content as part of this project.
6. You may get questions about whether the wording in the disposal schedule action field (i.e. the bit that tells you whether the record is Permanent or Temporary, and how long to keep it) can be altered. In general, the answer is not really. We must use either the word Permanent or Temporary to describe the disposal status of the records. We can't use alternative terms like 'indefinite' or 'ongoing' or 'Yet to be Determined'.
7. All Permanent records must be transferred to the State Archives once they are no longer in use – the guide is around the 20–25-year mark. In a very few exceptional cases a Permanent class may include the instruction to 'retain records in agency' – it is not envisaged any classes in the DAs for common administrative functions will include this.
8. All Temporary records must include a minimum retention period, and a trigger for this retention period to commence.
9. Where possible we are moving away from phrases such as 'Destroy when reference ceases' or 'Destroy when administrative use ceases' and including a firm time period – even if it is quite short. This removes doubt when sentencing records.
10. We are also moving away from 'double-barrelled' retention requirements e.g. 'Destroy 75 years after date of birth, OR 7 years after last date of action, whichever is longer.' These are hard to program into information systems and often require research to work out which to apply to each piece of information. Instead, we usually recalculate as a single requirement that will encompass both for most cases e.g. 'Destroy 90 years after date of birth.'
11. In general, we will use the trigger 'after action completed'. This allows each agency to determine when action is completed in its own processes and systems, AND to be able to update this internally if systems and processes change over time.