Public Record Office Victoria

PROS 10/13

Disposal

Guideline

2

Implementing a Disposal Programme

Version Number: 1.1

Issue Date: 20/10/2010

Expiry Date: 20/07/2017

Victoria
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Table of Contents

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Acknowledgements

The Public Record Office Victoria would like to acknowledge the valuable contribution of members of the *Disposal Advisory Group* during the development of this Guideline.

Version	Version Date	Details
1.0	20/10/2010	Released
1.1	17/07/2013	Copyright changed to Creative Commons license

1.   Introduction

1.1   Public Record Office Victoria Standards

Under section 12 of the *Public Records Act 1973*, the Keeper of Public Records ('the Keeper') is responsible for the establishment of Standards for the efficient management of public records and for assisting Victorian government agencies to apply those Standards to records under their control.

Recordkeeping Standards issued by PROV reflect best practice methodology. This includes international Standards issued by the International Organisation for Standardisation (ISO) and Australian Standards (AS) issued by Standards Australia in addition to PROV research into current and future trends.

Heads of government agencies are responsible under section 13b of the *Public Records Act 1973* for carrying out, with the advice and assistance of the Keeper, a programme of efficient management of public records that is in accordance with all Standards issued by the Keeper.

In Victoria, a programme of records management is identified as consisting of the following components:

- A Recordkeeping Framework;
- Recordkeeping Procedures, Processes and Practices;
- Records Management Systems and Structures;
- Personnel and Organisational Structure; and
- Resources, including sufficient budget and facilities.

A programme of records management will cover all an agency's records in all formats, media and systems, including business systems.

1.2   Purpose

The purpose of this Guideline is to facilitate the implementation of requirements contained in the *Disposal Standard* and *Specification 2: Implementing Disposal Authorities*.

This Guideline will enable Victorian Government employees or consultants to correctly establish and operate a retention and disposal programme within an agency. It provides useful and practical guidance on the implementation of a disposal programme which adheres to best practice recordkeeping principles identified in the *Disposal Standard*.

1.3   Scope

This Guideline covers the steps required to plan, implement and review a disposal programme. Although this Guideline is focussed on an ongoing programme of work, it can also be used to guide a project based initiative.

Please note that this Guideline does not provide information on specific planning templates that agencies may be required to follow. Agencies should determine whether or not they are required to follow specific planning methodologies.

This Guideline focuses on developing and implementing a disposal programme and does not include guidance on selecting or implementing recordkeeping systems or consultancy services.

For definitions of terms used within this Guideline, please refer to the *Disposal Standard*.

1.4   Related Documents

This Guideline supports the *Disposal Standard* (PROS 10/13) and *Specification 2* which are supported by a number of other Specifications and Guidelines as shown in the following relationship diagram:
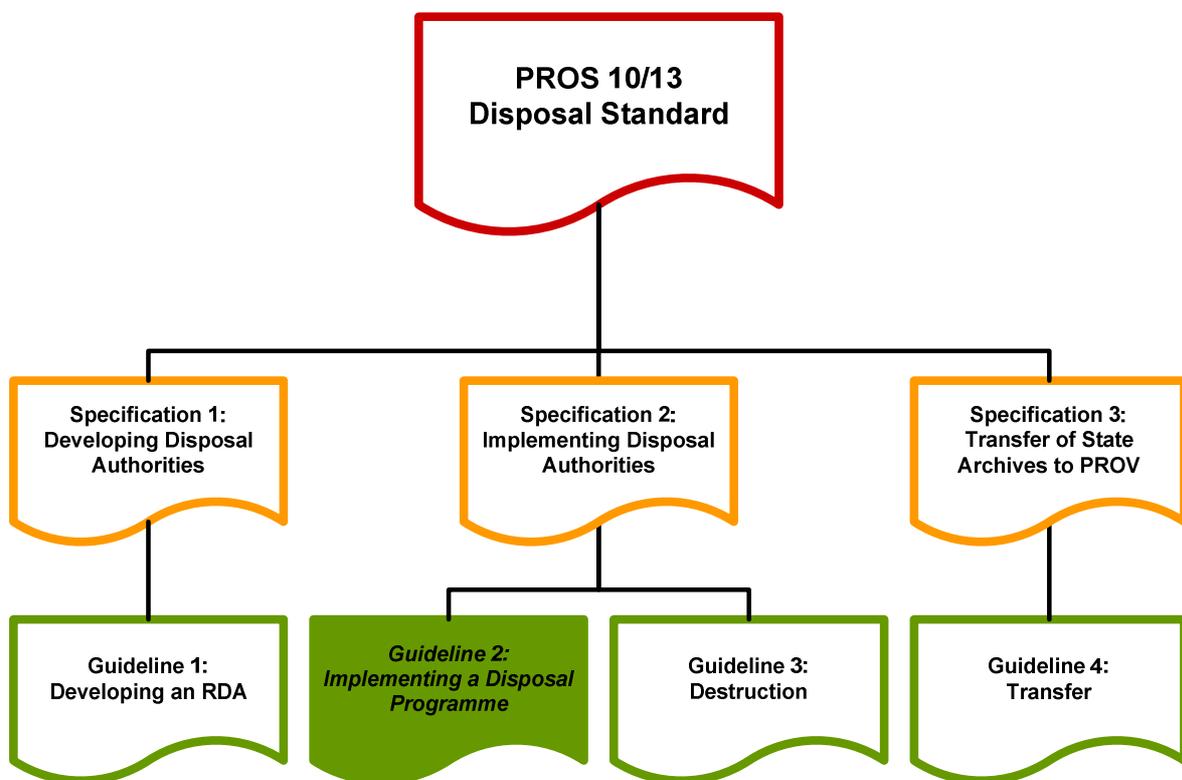

Figure 1: Relationship Diagram

2.   What is Disposal?

Disposal is defined as 'the range of processes associated with implementing records retention, deletion, destruction or transfer decisions which are documented in disposition authorities or other instruments'.[1] The lawful disposal of records is an essential and critical component of any records management programme.

Public records may be disposed of by the agency by either authorised destruction or through an authorised custody transfer. Destruction can be authorised through Normal Administrative Practice (NAP), Retention & Disposal Authorities (RDAs), or Single Instance Disposal Authorities (SIDAs). Custody transfers can be authorised through RDAs or by the Keeper of Public Records. The custody of records may be transferred to PROV (for State Archives), to an approved Place of Deposit (PoD), to other government agencies (due to machinery of government changes) or by sale to private organisations.

2.1   What is a Disposal Programme?

A disposal programme is the scheduled and managed set of activities required for the systematic sentencing and disposal of records. Sentencing is the process of identifying and classifying records according to a disposal authority, recording the appropriate disposal decision and action for the records, and applying the disposal actions specified in the disposal authority. An effective programme will ensure that all agency records are reviewed for retention or disposal at key points in their lifecycle.

2.2   What is a Disposal Authority?

Disposal authorities are issued by the Keeper of Public Records and are a legal instrument authorising the destruction or transfer of public records. They define the minimum retention time that different classes of records must be kept and how they are to be disposed of. They authorise the destruction of time-expired records. They also identify records that are to be permanently retained as State Archives. Disposal authorities ensure the disposal of public records is open, transparent and accountable.

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[1] Standards Australia, *AS ISO 15489.1 Australian standard on records management*, pt 1, Standards Australia, Sydney, 2002, s. 3.9.

2.3   Types of Disposal Authorities

There are different types of disposal authorities as outlined below. It is expected that agencies will use a combination of these types when implementing a disposal programme.

Agency specific Retention & Disposal Authorities

Agency specific Retention & Disposal Authorities (RDA) cover records related to functions and activities that are unique to a single agency. Ideally, these authorities will be structured around an agency's functions and activities to make the identification of records easier.

An example of a specific Retention & Disposal Authority is:

PROS 09/07 Retention & Disposal Authority for the Records of the Registry of Births, Deaths and Marriages.

General Retention & Disposal Authorities (RDA)

General Retention & Disposal Authorities cover the records related to functions and activities that are common to many agencies in Victorian Government.

An example of a general Retention & Disposal Authority is:

PROS 07/01 General Retention & Disposal Authority for Records of Common Administrative Functions.

Single Instance Disposal Authorities (SIDA)

Single Instance Disposal Authorities (previously referred to as Ad Hoc Disposal Authorities) may be used when there is no existing disposal coverage and the records relate to a function or activity which is not currently performed by the agency.

Normal Administrative Practice (NAP)

Normal Administrative Practice (NAP) is a mechanism approved by the Keeper that enables all public sector employees to destroy some records in the course of their normal duties. The following material may be destroyed at any time under NAP:

- Working documents consisting of rough notes and calculations used solely to assist in the preparation of other records such as correspondence, reports and statistical tabulations;

- Drafts not intended for retention as part of the agency's records, the content of which has been reproduced and incorporated in the agency's recordkeeping system; and

- Extra copies of documents, emails and published material kept solely for reference.

The destruction of records under NAP is the responsibility of the government agency. The agency is responsible for ensuring that all staff understand NAP and are able to apply it correctly in their day to day work, for instance, in the management of emails.

2.4   Identifying the Right Disposal Authority

It is important to ensure that the agency uses the correct, most appropriate disposal authority when disposing of records. Agencies should ensure that their records management procedures and policy refer to all relevant authorities that may be used to dispose of records. To successfully implement a disposal programme an agency must have disposal authorisation for all of their records.

Each agency will use a combination of disposal authorities to meet their needs and these may vary to suit different situations as follows:

- All agencies will use the RDA for Records of Common Administrative Functions and for some agencies this may be the only Disposal Authority required.

- In some agencies the RDA for Records of Common Administrative Functions may be used in conjunction with an agency or sector specific RDA.

- Some agencies will use the RDA for Records of Common Administrative Functions and a general RDA (e.g. schools and local government).

- In some agencies, a Single Instance Disposal Authority may be required in addition to any RDAs.

- All agencies will use Normal Administrative Practice (NAP) to dispose of some records they create or manage.

3.   Business Benefits

The benefits of implementing a disposal programme to manage records are extensive and tangible. A well developed disposal programme can improve practices across the agency by establishing records management best practice through a structured, regular disposal programme that is risk adverse and manages all records through to the end of their lifecycle.

A planned disposal programme:

- Makes more efficient use of resources, reducing storage and maintenance costs;

- Enhances access to existing records by only retaining required records;

- Assists with identification of records required for Freedom of Information (FOI) requests, subpoenas and discovery in general;

- Ensures records are kept for the correct period of time;

- Identifies permanent records, enabling appropriate management prior to transfer to PROV;

- Provides for the systematic management of agency records and reduces risk, and Assists with legislative compliance (e.g. *Public Records Act 1973 and s. 254 of the Crimes Act 1958.*)

4. Methodology
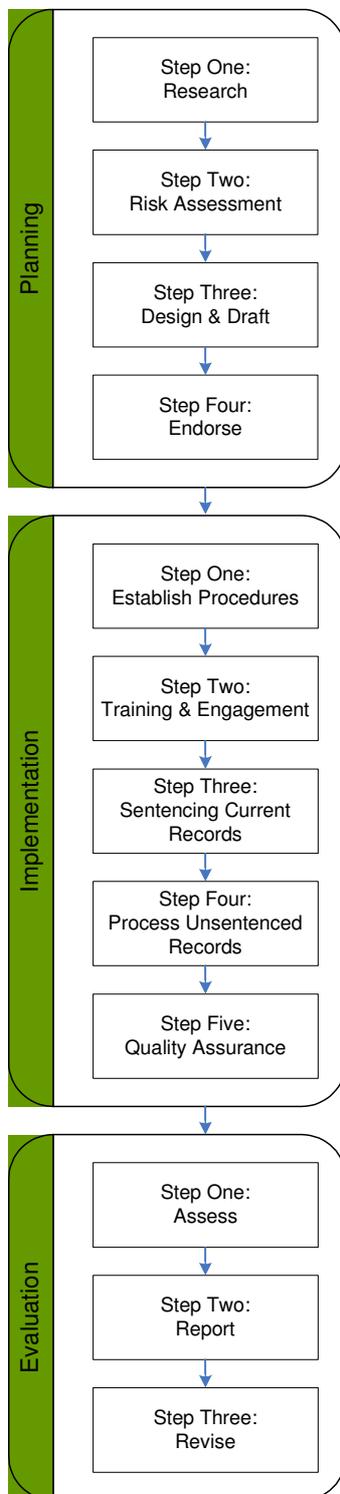
The methodology to implement a disposal programme has three distinct stages: planning, implementation and evaluation.

During the planning stage the records manager will need to research the record holdings, conduct a risk assessment, design and draft the programme, and have the programme formally endorsed.

During the implementation stage the procedures are established, training and engagement is conducted, processes to sentence current records are established, unsentenced records are processed, and quality assurance processes are put in place.

The final stage is evaluation where the programme is assessed, reported on and revised.

Planning
- Step One: Research
- Step Two: Risk Assessment
- Step Three: Design & Draft
- Step Four: Endorse

Implementation
- Step One: Establish Procedures
- Step Two: Training & Engagement
- Step Three: Sentencing Current Records
- Step Four: Process Unsentenced Records
- Step Five: Quality Assurance

Evaluation
- Step One: Assess
- Step Two: Report
- Step Three: Revise

Figure 2: Methodology for Implementing a Disposal Programme

5. Planning

5.1 Step One: Research

Every agency will have a different records management environment and reasons for the establishment and implementation of a disposal programme. For instance some agencies may have a hard copy records management system with multiple storage areas or facilities reaching full capacity. Others may have multiple electronic systems which are not managing disposal. Whatever the situation, researching the current records environment will help to understand how the new disposal programme would work best.

To successfully implement a regular disposal programme, a number of products may need to be developed and implemented. These products will be produced as an outcome of the research and include disposal procedures; an appraisal report; a map of disposal triggers; disposal register and training material on disposal for agency staff.

Conducting a Records Survey

Usually there will be a need to establish where the majority of records are held, particularly if the records are managed across an agency with multiple floors or sites. In these circumstances it is useful to conduct a records survey. It is recommended that the purpose of the records survey is communicated broadly to ensure that all staff co-operate and ensure there is a clear understanding about why the survey is being conducted.

The survey should establish where records are stored; what volumes are held; and in what condition the records are in. If the agency has records stored at multiple sites, the records manager should meet with the officer responsible for the records in the storage areas or facilities to discuss their storage arrangements.

Hard Copy Records Management Systems

If the agency has a hard copy records management system in use, the disposal programme may be limited to hard copy files only. Initial investigations could include, but are not limited to, establishing how many records are registered in the system; the percentage of files that will need to be registered; and system functionality that is available to automate disposal activities.

Legacy Records

Legacy records are those that have been inherited from previous agencies due to amalgamations, structural or functional changes, or Machinery of Victorian Government Changes. Legacy records can take the form of hard copy records or digital records and may or may not be managed in secondary storage.

Initial investigations could include, but are not limited to, volumes of legacy records; storage costs; targets to minimise the volume of unsentenced legacy records; and costs associated with migrating legacy records.

Storage Areas or Facilities

If the agency is using storage facilities that don't meet recordkeeping requirements this can present major risks for the agency. It is recommended that a risk assessment be conducted to establish the risk rating for storage facilities. A risk mitigation strategy should then be developed as part of the disposal programme. Initial investigations on the use of these sites could include, but are not limited to, determining the locations of storage facilities; assessing environmental risks; and assessing security risks. Detailed requirements for the storage of public records are located in the PROV *Storage Standard*.

The extent to which the agency is using commercial storage facilities is also of relevance to the review of the records management environment. Initial investigations could include, but are not limited to, the location of the facility and its convenience to the agency; what percentage of records held in storage areas or facilities are sentenced; costs involved in storing and retrieving records; and contractual obligations.

Electronic Document & Records Management Systems (EDRMS)

Digital records in an EDRMS need to be sentenced against a current Disposal Authority, just like hard copy records. The EDRMS may have functionality available which can be used to automate disposal activities. The Business Classification Scheme (BCS) or file titling structure may be able to be linked to disposal classes in the RDA to streamline sentencing during folder creation. Triggers may be created to prompt disposal reviews and workflows created to manage the disposal approval process. Initial investigations could include how to import record disposal classes into the EDRMS, mapping functions and activities from the BCS to the RDA, and researching the retention and disposal functionality of the EDRMS.

For further information on managing records in an EDRMS see *Management of Electronic Records (PROS 99/007)*.

Shared Drives & Email

Shared drives and email can present the records manager with many challenges, especially where they are used throughout the agency in an uncontrolled way. If this is the case, it will be vital to assess the agency's compliance with recordkeeping requirements and consider how best to address digital records within the disposal programme. The disposal of digital records stored in shared drives and email accounts can be a large task. It may be worthwhile considering if this part of the disposal programme should be implemented in stages, to break the work down into more manageable parts.

Business Systems

Business systems will contain records that should be managed through a disposal programme. They can, however, present challenges when managing the lifecycle of the record.[2] Some questions to be considered are:

- What records are created and managed in business systems that should be considered by the disposal programme?

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[2] For further information and an in-depth guideline on managing records in other business systems see: International Council on Archives 2008, *Principles and Functional Requirements for Records in Electronic Office Environments – Module 3: Guidelines and Functional Requirements for Records in Business Systems*, International Council on Archives, Canberra, viewed 15 April 2010, <http://www.ica.org/sites/default/files/ICA-Guidelines-Principles%20and%20Functional%20Requirements%20Module%203.pdf>.

- How to work co-operatively with business owners and the IT area to implement the disposal programme for records in these business systems?

- Who is responsible for the records disposal activities in other business systems?

- Is it worthwhile to capture these records from the business system into the EDRMS?

Reviewing Current Disposal Processes

If record disposal processes are already operating in the agency, it is essential to understand how these processes work. Some questions to be considered are:

- Are any activities being undertaken for record disposal now?

- Who participates in each step of disposal activities?

- Does the disposal process comply with legislation and PROV Standards?

- How is the correct interpretation and implementation of disposal actions assured?

- How widely is Normal Administrative Practice (NAP) understood and used in the agency?

- How is the preservation of permanent and long term temporary records (hard copy and digital) assured?

It is also useful to investigate how widely the agency's recordkeeping and business systems and used across the agency. If a significant proportion of records are being kept outside official systems, the disposal programme will need to be designed to identify and incorporate these records.

5.2   Step Two: Risk Assessment

Before designing the disposal programme, it is recommended that a risk assessment be conducted. This should assess the current recordkeeping environment and the level of risk it poses to the agency. Some example risks related to record disposal practices are provided in Table 1 below. The disposal programme should be designed to mitigate any unacceptable risks. Consider reviewing risks for each business function, as some functions have higher consequence ratings than others. This will highlight where efforts to mitigate risks should be concentrated.

Risk Category	Risk	Consequence Rating	Likelihood Rating	Level of Risk
Unauthorised destruction	Destruction occurs without reference to a disposal authority.	2 – Very High / Major	C – Possible	High
	Use of NAP is uncontrolled leading to the destruction of documents without reference to the RDA.	2 – Very High / Major	B – Likely	High
Deletion of electronic records	The deletion of electronic documents to increase hard drive space without reference to recordkeeping responsibilities and the disposal programme, leads to the agency being fined under the *Crimes (Document Destruction) Act* for breach of compliance.	3 – Medium / Moderate	C – Possible	Medium
	Email is deleted from inboxes without checking for and saving corporate emails leading to the agency damaging its reputation by not being able to produce proof of an agreed course of action.	2 – Very High / Major	B – Likely	High

Risk Category	Risk	Consequence Rating	Likelihood Rating	Level of Risk
Inappropriate destruction methods	Records destruction services provided by a contractor do not use appropriate destruction methods leading to political embarrassment as confidential records were found at a Council rubbish tip and provided to the media.	2 – Very High / Major	B – Likely	High
Ad-hoc or non existent disposal programme	The majority of records held in the agency are unsentenced, leading to high storage costs and an obligation to dedicate more time and effort to managing records.	2 – Very High / Major	B – Likely	High
	A document is leaked due to an inadequate disposal method causing breaches of the *Information Privacy Act 2000*, major embarrassment and legal consequences.	2 – Very High / Major	B – Likely	High
Inappropriate storage locations	Preservation of records can not be assured. Environment is uncontrolled with the possibility of floods, extreme heat etc. Security is not assured against unauthorised persons accessing records, theft and pests.	2 – Very High / Major	B – Likely	High
Undocumented destruction	Destruction of records occurs without appropriate accountability and documentation, leading to the agency being unable to account for its actions.	2 – Very High / Major	B – Likely	High

Table 1: Example Record Disposal Risks

For further information on conducting risk assessments see PROV *Strategic Management Guideline 6: Records & Risk Management*.

5.3   Step Three: Design & Draft

The disposal programme needs to be designed to take into account the agency's recordkeeping environment and level of risk. The programme should be documented so that it can be effectively communicated to senior management and staff that will be involved in its implementation. Each risk identified during step two should be accompanied by a strategy that will be implemented to limit the impact of the risk. Key milestones and measures should also be included so that they can be used to report progress. The document could include research findings, stakeholder consultation, communication activities, activity schedules and training strategies.

A documented disposal programme:

- Establishes the objectives and scope of the programme;
- Identifies the key disposal authorities to be used in the programme;
- Provides an outline of the key products and timelines for the programme;
- Identifies who will be needed and for how long;
- Outlines potential costs involved;
- Identifies potential risks to the successful completion of the programme and suggest possible strategies to prevent or lessen the impact of these risks, and
- Promotes the benefits of establishing the programme.

Programme Structure

When deciding how to structure the disposal programme, consider the following:

- Whether to stage the programme around records series, disposal classes, or agency divisions.

- Whether or not there is a disposal backlog and how large the backlog is.

- The steps involved in the disposal authorisation process.

- The use of internal resources, external consultants and service providers.

- Which activities can be devolved and which can be centralised.

- Training that will be required.

The frequency of the retention and disposal review cycle is an important decision that must be made. Consider the agency's business needs, costs, approval timeframes, specific urgencies and the current records management environment.

Examples include:

Annual review cycle: This might be sufficient if the agency does not have a large backlog and is not producing huge volumes of records.
Bi-annual review cycle: might be more suitable for larger volumes of records.
Monthly review cycle: If the agency is quite large, focussing on one division or section per month might be more efficient.

Cost-Benefit Analysis

Next, calculate an estimated cost for the disposal programme by defining the specific costs associated with each activity. If a Business Case is required to obtain extra funds, the estimate should be provided as part of the case. Compare the programme costs with current costs which could be reduced, such as storage costs. Consider including multiple options, where the expected outcomes and cost of each option are compared. Including long term cost savings in the business case may provide a particularly persuasive argument to support the request for funds. For further guidance on this topic, see the PROV *Strategic Management Guideline 4: Writing a Business Case*.

Consultation

Consulting with key stakeholders prior to implementing a disposal programme will allow their needs can be incorporated and concerns to be addressed. This will be particularly important if significant changes will occur as part of the implementation. Determine who the custodians of the records are; how many will need to be consulted; how consultation should occur; and at which points in the process.

5.4   Step Four: Endorse

Before commencing a disposal programme, it should be formally endorsed by senior executives, a governance group or steering committee. A proposal or business case should cover:

- The business need that the disposal programme will meet;

- The options to best address the disposal programme;

- Analysis of the benefits and costs of the options;

- Recommendations regarding the preferred option;

- Risk identification and mitigation strategy, and

- Implementation strategy.

For further information on writing a business case see PROV *Strategic Management Guideline 4: Writing a Business Case*. For further information on governance see PROV *Strategic Management Guideline 5: Records Management Strategy*.

6.   Implementation

6.1   Step One: Establish Procedures

The first step when implementing a disposal programme is to establish or review the agency's record disposal procedures. When developing procedures it is advisable to consult with key internal stakeholders to establish the business needs and ensure the procedure is practical to implement. Providing clarity on processes will ensure that the disposal activities can be competently managed on a daily basis by all who have a role to play in record disposal.

When developing record disposal procedures, the agency should refer to *Disposal Specification 2: Implementing Disposal Authorities* to ensure all compliance requirements are met. The procedure should cover:

- Identification of records for disposal;

- Approval from relevant stakeholders;

- Implementation of approved disposal actions, and

- Documentation of disposal activities.

An example record disposal process:

1)   A report is generated to establish what records are eligible for disposal.
2)   A records officer with appropriate responsibility reviews the disposal report to ensure the report is accurate and all records are eligible for disposal under a current Disposal Authority.
3)   The content of files are spot checked to confirm that they contain are what their title indicates.
4)   The records manager sends a memo recommending the disposal nominations be considered and approved by the appropriate delegate. This memo is attached to the report and provided to the delegate.
5)   The appropriate delegate reviews and signs off on the disposal nominations, or provides a justification why they should be retained for a further period.
6)   The legal officer checks the disposal nominations and confirms no disposal freeze applies (see Section 5.1.1 below for details).
7)   Where necessary and in order to minimise risk, the appropriate executive approves the disposal actions. In most agencies, this would only be required for disposal actions associated with records that have a high risk associated with them or a high security classification. .
8)   The records manager reviews and approves final disposal report before any disposal actions commence.
9)   Disposal activities are delegated to the appropriate records officer to complete. This could include destruction of the records, or transfer of permanent records to PROV.
10) Documentation of complete process is filed for evidential purposes.

Disposal Freezes

A disposal freeze is a temporary restriction on the disposal of a designated set of records due to a special need to maintain access to the records. A disposal freeze may be initiated from within the agency or by an external authority. An internal disposal freeze is most likely

to occur due to an FOI application being received, an impending election, or due to current or possible legal action. An external disposal freeze may also be issued by PROV or another government authority. This may be due to an event or issue that has or may create significant public interest. Although a disposal freeze may not occur very often, the agency's record disposal procedures must ensure that records subject to a disposal freeze are not destroyed until the freeze is lifted.

Disposal Action Approval

It is essential that the implementation of all disposal actions is approved by the senior records manager or an appropriate delegate who understands the records and how they are used in the agency. Sometimes it may be necessary to minimise disposal risks (for example with security classified files) and in those instances it is useful to apply for executive sign off. It is also vital to have the legal checks in place to ensure that there are no underlying issues that a disposal activity may impact upon. Record disposal procedures should ensure that all record disposal approvals are documented and retained for accountability purposes.

6.2   Step Two: Training & Engagement

The ongoing records management training programme should include training on record disposal. Regularly and consistently presenting record disposal procedures to staff will increase awareness and help to embed the process in the agency. Providing clear direction about the correct retention and disposal process will assist with the smooth implementation of the programme and reduce the risk of unauthorised disposal occurring in the agency.

Some possible ways of training and engaging with staff and contractors include:

- Creating an awareness campaign for the disposal programme. This could include creating a short guide, fact sheet or poster which outlines the programme's aims.

- Conducting presentations to promote the disposal programme.

- Providing regular training courses which explain the disposal procedures.

- Attending staff meetings as a guest speaker to promote the disposal programme and records management generally. This will allow the delivery of tailored advice regarding the disposal programme and how it will affect specific sections of the agency.

- Including records management clauses in contracts with outsource organisations and ensure they are aware of the agency's record disposal requirements. See PROV *Strategic Management Guideline 2: Managing Records of Outsourced Activities*.

- Ensuring that staff exit procedures contain a statement about recordkeeping obligations to ensure that no records are destroyed or taken by the individual leaving the agency.

6.3   Step Three: Sentencing Current Records

Sentencing is the process of identifying and classifying records according to an RDA, recording the appropriate disposal decision and action for the records, and applying the disposal actions. It is far easier to manage the disposal of records once they have been sentenced against a disposal authority. For this reason records should be sentenced early in the records' life, while they are still current. It is also more efficient to sentence a folder of records, rather than documents individually. Sentencing current records first and ensuring processes are in place for new records will help to cap the volume of unsentenced records in

the agency. Then once the record has been closed, the disposal process is streamlined and disposal actions can be managed very efficiently.

If the agency has an EDRMS, it can be used to facilitate the disposal of records. If the system has retention and disposal functionality, relevant retention and disposal authorities can be loaded into the system. It may also be possible to link disposal classes to the business classification scheme. This will facilitate automatic sentencing of records at the folder level. Disposal triggers with automated workflows may also be configured to allow the system to manage the disposal process. This streamlines disposal activities and reduces the effort, resources and time required to manage a review of records.

Planning and testing is required for successful automation of disposal activities in an EDRMS. Plan any changes and apply them in a test system first to ensure they work correctly. It is recommended that a test plan is written and tests run before implementing changes on a production system. Tests could include loading disposal authorities, checking that appropriate disposal classes are attached to new folders, verifying that triggers activate at the correct time, and confirming workflows are sent to the correct people.

6.4   Step Four: Process Unsentenced Records

Once a process to sentence current records is established, backlogs of unsentenced records should be processed. Strategies for processing and sentencing unsentenced records will depend on the extent of backlog. Set achievable KPIs for reducing backlogs. This could be in the form of daily, weekly and monthly targets. If the records are registered in the recordkeeping system consider using matching tools to automate the sentencing of these records. This could significantly reduce the handling and review time involved. Using a team of dedicated staff, particularly staff that have sentencing expertise, may be useful to complete large volumes, especially in situations where the records must be processed quickly.

Legacy Records

Records which have been transferred to the agency from other government agencies are often referred to as legacy records. The integration of these legacy records into the agency can be complex. In some agencies, these records may comprise a large volume of the records held in storage areas or facilities. Disposal of legacy records can be especially difficult because knowledge about the records may be unavailable, and the recordkeeping systems used to manage them may be obsolete. This makes it problematic to identify records and apply disposal actions. To ensure that legacy records are processed within a reasonable timeframe, set specific targets for the review of legacy records.

Storage

Checking hardcopy records that are being put into storage areas or facilities is a good way of identifying unsentenced records for processing. Establish a business rule that records can only be stored once they have been sentenced against a current Disposal Authority. This can be as simple as updating the records management system and writing the disposal class reference and a review date on the folders.

Records already in storage can be checked when they are retrieved for access purposes. Establish another business rule that records can only be returned to storage once they have been sentenced against a current Disposal Authority. Over time this will minimise the volume of unsentenced records held in storage areas and facilities.

6.5   Step Five: Quality Assurance

The accurate implementation of authorised disposal actions will require agency systems to operate correctly and people to interpret disposal classes consistently. Quality assurance checks should be established and conducted regularly to identify and rectify any errors. An effective quality assurance process will ensure that errors are caught early before records have been destroyed or transferred.

Quality assurance checks could include a mix of the following:

- Completing checklists when disposing of records.

- Reviewing weekly reports of all new folders which have been created to ensure they have been sentenced correctly.

- Testing the records management system periodically (in the test environment) to verify that disposal processes are working correctly.

- Spot checking boxes being sent to storage to ensure that the records are registered, sentenced and the next trigger for review is set.

- A buddy system, where records officers can be called by records champions to ask questions.

- A peer review process, where records management staff in a similar government agency periodically review some disposal reports.

- An issues log to document all record disposal queries. Once a set of common queries are identified publish a list of Frequently Asked Questions and update training materials.

7.   Evaluation

A regular evaluation of the disposal programme should be conducted to ensure the processes and activities are operating effectively and smoothly. This can highlight any barriers to successful disposal outcomes which may need to be overcome. Assessing what has worked well and what has not worked so well is particularly important when the programme has only recently been established.

7.1   Step One: Assess

The first evaluation should occur shortly after the first round of disposal has been completed. Subsequent evaluations should then occur on a regular basis, e.g. annually or biennially. Select an evaluation frequency which is suitable for the agency and then schedule a regular assessment of the programme. Use disposal reports, the risk assessment, the original research and discussions with key stakeholders to build a complete picture of how well the programme is working. This will provide the opportunity to reflect on achievements and challenges, where risks have been minimised, what could be altered to work more smoothly and to celebrate the success of the programme.

7.2   Step Two: Report

Reporting on the outcomes of the disposal programme to the relevant governance or steering committee will help retain their sponsorship and ongoing support. The report should cover why the programme was established, what activities were planned, what actually occurred and what the outcome was. Recommendations regarding how to improve the programme should also be included. When requested, the agency will need to provide a report to PROV about the disposal programme and the activities undertaken.

7.3   Step Three: Revise

Once the report and its recommendations have been considered there will probably be a need for some revisions to the programme. The process outlined in the planning stage outlined in section four of this Guideline should be followed when making changes to the programme. It is particularly important to consult with key stakeholders who may be affected by significant changes prior to their implementation.

8. References

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Queensland State Archives 2007, *Guidelines for the Implementation of Retention and Disposal Schedules,* Queensland State Archives, Queensland, viewed 18 March 2010, <http://www.archives.qld.gov.au/downloads/implementation_guideline.pdf>.

Legislation

Crimes (Document Destruction) Act, 2006 (Vic)

Evidence Act, 2008 (Vic)

Information Privacy Act, 2000 (Vic)

Public Records Act, 1973 (Vic)

All current Victorian legislation is available at http://www.legislation.vic.gov.au

Other Resources

For more information about implementing a disposal programme, please contact:

Appraisal & Documentation Team
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Appendix 1: Checklist for Implementing a Disposal Programme

Planning

Question	Yes	No	Unsure	Comments
Has the legislative and business environment been identified and considered in relation to the programme and has the *Public Records Act 1973*, other legislation, RDAs, agency directives, and government policy been included where required?				
Has the current state of the records management environment been explored and clearly defined?				
Has the records management context regarding the issues or problems been clearly addressed?				
Has a cost-benefit analysis been completed?				
Have the risks involved been identified?				
Has the financial impact of the programme been considered?				
Have the objective, scope and boundaries for the disposal programme been set?				
Are the major concepts and strategies that will be used clearly expressed?				
Have strategies been put in place to address any key implementation issues which have been identified?				
Have challenges, problems, or issues been clearly acknowledged and addressed?				
Has an implementation strategy been included?				

Question	Yes	No	Unsure	Comments
Is the plan plausible and realistic?				
Does the plan demonstrate the value of a disposal programme to the agency?				
Is the plan clear and understandable from a non-records view point?				
Has the steering committee or governance board agreed to convene and consider the proposal?				
Have the resources and finances that will be needed for the disposal programme been stated and included for consideration?				
Have all options been covered?				
Is the recommended option clear and plausible?				
Do the options include a 'do nothing' option that addresses the current state of things?				
Does the proposal adequately support the recommended option				
Does your plan for implementing a disposal programme have the agreement of the governance or steering committee?				

Implementation

Question	Yes	No	Unsure	Comments
Have the tasks and activities involved in the programme been process mapped, documented and approved?				
Is there a set approval process that will need to be followed?				
Have the associated risks to be managed been addressed?				

Question	Yes	No	Unsure	Comments
Is there a timeline showing clearly all steps for the disposal activities?				
Are the key performance indicators developed for the disposal activities?				

Evaluation

Question	Yes	No	Unsure	Comments
Have the Quality Assurance measures been clearly defined, set and communicated?				
Have the parameters of reporting been defined and set and are reporting lines clear?				

Appendix 2: What skills are required?

There are three distinct roles that will be required to implement a disposal programme.

1. A management and planning role;

2. An Archivist role, to complete appraisal and sentencing; and

3. Processing and data entry.

No matter what role is being undertaken, the skills and competency of staff is important to the success of the disposal programme. You and your staff must know what to do, how to do, when and with what tools. On saying that, there are great learning opportunities to gain expertise as an archivist. Remember that the knowledge, expertise and the learning experiences gained by participating in a disposal programme are valuable and just as important as qualifications.

Minimum skills and experience required include:

- Knowledge of the appropriate Retention & Disposal Authority.

- When to use the agency specific Retention & Disposal Authority and when to use the Common Administrative Retention & Disposal Authority.

- How to interpret a class.

- How to match a disposal class to a record.

- How to register the disposal actions within the records management system.

- The ability to produce and follow procedures for transfers to secondary storage that include the appropriate sentencing actions.

- How to ensure that the destruction actions are complete and they comply to PROV *Disposal Specification 2*.

- Building up an expert knowledge base about the RDAs that are being used will enhance credibility for the whole disposal programme.

- Negotiating and working with third party providers to get the best outcome for the programme. (Remember getting a good deal for archive stationary and boxes, and keeping enough stock of the right size boxes, for both secondary storage and archive quality boxes can really make a difference to the programme).

- How to work with the PROV to complete a successful transfer of permanent archival records, must attend the appropriate transfer training.

Who should participate in the programme?

Your choice of people to do the work will impact on the disposal programme, so the decision must be context driven by the research and review of the records in your agency, and there is no right or wrong answer. Who is chosen to complete a disposal review will depend on:

- The scope of the programme?

- How many records are involved?

- How much budget is allocated?

- The state of the records? For example if the records are in a state of decay because of water or fire damage there might be the need for the expertise of an archivist who has a strong background in conservation of records on their resume.

- What is known about the records? Is this tacit knowledge held by a small group in the agency, are they completely undocumented, or are they registered in some form that will assist the review?

- Is one of the outcomes of the disposal programme a transfer of permanent records to the PROV? If so, there will be a need to liaise with PROV's Appraisal and Documentation team to schedule the transfer, all files and record items must be archived in long term preservation, archive quality, acid free boxes and archival materials such as photo sleeves, tape, etc.

- Is it expected that there will be large volumes of records approved for destruction? If so, you will need a plan to manage this, ensuring the formal contract with a third party provider for secure destruction is adequate. Remember to collect destruction certificates as evidence of the activity, to provide as part of the reporting on activities.

Records management staff

It's essential for the records team to know what the disposal programme aims to do and what their specific responsibilities in the disposal programme will be. It's also recommended that team meetings are held regularly throughout the programme, so that all team members know what's happening. Recognise that records team members will be asked questions about the programme, and they'll want to be able to answer these with confidence as a records management professional. This will build strong team dynamics and reduce the risk of uncertainty and misinformation about disposal activities and time frames in the programme.

Records management role definitions

As a baseline, the disposal programme activities need to be included into all records management position descriptions, so that all records roles have a clear understanding of what they are expected to do. At the same time, all records staff participating in the disposal programme should have their role included and acknowledged in the agency's performance development process. It is recommended that the planning includes the development of multiple, cross over roles within the records team for the disposal programme, so that it is not simply the domain of the archivist, or senior records manager, or a single individual, whatever their title. This is so that there is no single point of failure, particularly if the team is small, contingency plans can be as simple as "when one person goes on holidays, everyone else knows what to do" and the programme can continue smoothly.

Records champions

It is vital to ensure competency of staff who are acting as records champions at the business level. These people will be a significant conduit for promoting good record practices, as well as a major channel for communication to the business about records, assisting to build great working relationships with divisions, sections and business units.

Records champions must also know what to do, how to do, when and with what tools. Train and work with the champions to embed records management practices, disposal processes and activities into their sections' processes and practices, so that it makes sense and provides strong purpose for their actions. Provide lots of practical examples when working with them and instructing staff on implementation. Push the approach that working to the disposal programme will protect them, their colleagues, their manager, executive, the

Secretary or CEO; their clients and stakeholders. It also takes the risk, uncertainty and fear out of the process by setting clear and transparent rules and procedures to follow.

Role definitions for records champions

Recognition and acknowledgement in the performance development process is very important to build respect, common aims and responsibility for the records champions to continue to participating in the programme with enthusiasm and willingness to meet the challenges of change management. There will be a need to assist both the records champion and their manager to write up their role in a way that describes the effort and collaboration properly for the performance development process.

Where possible records champions should have a section added into their position description that confirms their role and contribution. Seek opportunities to contribute to the construction of new position descriptions where the role has a records champion component. Write standardised accountabilities and have these approved by HR, to ensure that these accountabilities are able to be slotted into positions when they become vacant.

Appendix 3: Using NAP in the Disposal Programme

Normal Administrative Practice (NAP) can be used as a clear way for the records management function to promote the differences between disposal and destruction. It assists in building confidence in the overall disposal programme. It empowers staff with decision making about what records can be disposed of at the working level of recordkeeping.

It is important to define NAP within the disposal programme with education and training. A disposal programme that promotes NAP will engender strong credibility and a visible "quick wins" for participants as well as ensuring that NAP is used correctly in the agency.

Consider using these ideas to focus on NAP disposal activities:

- Run workshops and offer a tailored consultancy to each division, section, or business unit to identify specific documents in the area that can be destroyed under NAP.

- Investigate opportunities to link workshops and consultancies to NAP working bees where all documents that can be easily identified as NAP are put in a locked bin.

- Run a competition, with an award or small prize for the division or business unit that most actively participates in the NAP clean up. Use the "before" and "after" photos to promote further clean-ups and promote the competition as a fun way to build best practice to comply with the disposal programme and clear desk policy, that is part of the code of conduct for all Victorian Public Servants.