RDA Development Guide 3

Drafting RDAs with rolled up classes

1. About this guide

Drafting a Retention and Disposal Authority (RDA) is the most intensive part of the RDA development process as it takes significant time, effort and skill to comprehensively research and document functions, draft disposal classes and provide justification for appraisal decisions.

This guide has been developed to assist Victorian Government agencies when drafting an RDA to:

- accurately and comprehensively research and describe the functions of an agency(s)
- draft 'rolled up' disposal classes
- assign the most appropriate disposal status and action.

It provides supplementary information pertaining to the following step in the RDA development step-by-step:

- *STEP 3 – Develop the RDA.*

2. About 'rolled up' style RDAs

PROV has remodelled the disposal program to improve our appraisal practice and issue retention and disposal authorities that are easier to develop and use, have longevity and can be used across government as much as possible.

A key change has been the introduction of what is known as the 'rolled up' or 'big bucket' style of RDA. Previously, RDAs were structured according to Function – Activity – [multiple] Record Classes (i.e. classes with varying disposal actions and retention periods). Some of the older RDAs are still in this style.

In contrast the 'rolled up' class approach classifies records more broadly according to function and disposal outcome. RDAs must comprise one or more functions, comprehensively and concisely described, containing minimal record classes based on retention periods. Records generated by the function with similar retention period are grouped together, as if they have been placed in big buckets. Activities are not described.
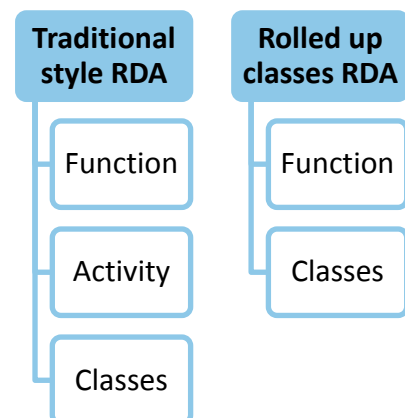
2.1 Benefits of rolled up style RDAs

Overall this approach streamlines the structure and makes it easier to develop the RDA.

RDAs with "rolled-up" classes can also be easier to implement and use. While they still provide comprehensive coverage, fewer class options makes sentencing easier as there are less classes to select from. Also, given the class descriptions in these types of RDAs are more general in nature, they are less prescriptive and provide greater flexibility in application.

3. Structure of rolled up style RDAs

Rolled up style RDAs are comprised of *functions* and *classes*. A detailed outline and examples of these elements are provided below.

3.1 Functions

The RDA must include the core and unique functions of an agency that are neither common administrative functions nor functions sufficiently covered by an existing RDA. The function includes a title and descriptive scope note which is a description of the processes and activities carried out in undertaking the function.

The function description (scope note) needs to:

- describe succinctly all work performed as part of the function

- include work done to administer or support the function (e.g. case management activities). (record classes provide further detail about records created to document these business processes)

- avoid jargon—use plain English so those not familiar with the functions or workings of the agency can understand the content

- list exclusions to assist in defining boundaries between functions

- include detail that will enable staff implementing the RDA, who may not have a thorough understanding of your agency's business, to select the appropriate function

- include any cross references to related functions that are covered in other RDAs that the agency is authorised to use (e.g. the RDA for common administrative functions).

Example of a functional scope note:

Collection Development and Management

The core tasks associated with collection development and management include:

- research to identify potential acquisitions (including inspections and condition assessments), to establish provenance, and into the history and use of acquired items acquisition, storage, control, maintenance and de-accessioning of items within the collection, including the establishment and maintenance of registers
- preparation, preservation and conservation, including remedial treatment (repairs) and preventative techniques (such as repacking or rehousing items to prevent damage or deterioration)
- valuation of items and collection audits ('stocktakes')
- environmental control and monitoring
- development of handling protocols and other risk management processes for items identified as containing hazardous substances
- giving and receiving advice on collection development and management issues submissions to support the development of the collection, including funding requests.

For loans in and out of the collection, see 1.0.

See *Records of Common Administrative Functions* for policy, procedures, strategy development and implementation.
See *Records of Common Administrative Functions* COMMUNITY RELATIONS for enquiries and requests for information concerning items within the collection.
See *Records of Common Administrative Functions* for operational records relating to hazardous substances, including storage and audit.
See *Records of Common Administrative Functions* for records of insurance, security arrangements and disaster management planning.
See *Retention and Disposal Authority for Records of the Royal Botanic Gardens Board* for records related to horticultural and wildlife management, including field collection of specimens.

Source: *PROS 17/03 Retention and Disposal Authority for Records of Museum and Gallery Functions*

3.2 Record classes

A record class includes:

- class number – a number allocated by the Online Retention and Disposal Application (ORDA) and which must be cited, alongside the Public Record Office Standard (PROS) RDA number, when documenting the legal destruction or transfer of the records
- class description – a scope note detailing the records that are covered by the class and which defines the boundaries of the class
- disposal status and action – describes what happens to the records, that is, whether they are to be retained as State archives or can be destroyed after a certain event occurs (the 'trigger').

3.2.1 Identifying record classes

Agencies have flexibility when making decisions about how many classes to include in the RDA. The guiding principle for developing rolled up or big bucket classes is to minimise classes whilst avoiding excessive retention of records.

To determine your record classes, you need to first identify all the activities and business processes that occur for each function, and the records generated by those activities and processes. You then need to appraise the function and the records according to the Appraisal Framework set out on our [Appraisal](#) web page.

If there is sufficient evidence to recommend the records' retention as State Archives, these records should be described together in one class for all permanent records, rather than having a number of permanent classes within the one function.

For records not required as State Archives but which must be retained for finite periods to meet government business and/or regulatory requirements, there are several ways to develop record classes:

- combine the records into one or more comprehensive class(es) and retain them for the longest period. For example, if you identified records to be kept for two, three, five, seven, 25 and 30 years, these could be grouped or rolled up into a short-term temporary class kept for seven years (combining the two, three, five and seven years) plus a longer-term temporary class kept for 30 years (combining the 25 and 30 years)
- begin with the assumption that you will have one class and then identify records that have characteristics that warrant a separate class. For example, it would not be sensible to keep a high volume of transactional records with associated high storage costs for seven years if you could destroy them after two years; or
- a combination of the above two options.

In some circumstances, it will not be possible to include certain records in a class because the trigger event is different from the other records.

For example, while most records can be destroyed after a specified period after *last action* (*last action* being determined by the agency), some records, especially those relating to the rights and entitlements of individuals, should only be destroyed after a specified period *after a certain age is reached* (e.g. the medical records of minors). In these instances, the records should be placed into separate classes to allow for different disposal triggers.

It is also worth remembering that excessive retention may breach privacy principles and very occasionally, keeping records for a longer period may be illegal because destruction is required by law.

3.2.2   Describing record classes

The record class descriptions must be clear and provide sufficient detail so they can be understood by any reader. Potentially the RDA could have a wide audience.

All agency staff and contractors should be able to understand its requirements including any specialist recordkeeping staff hired to implement the RDA (who may have a limited understanding of the agency's business). Importantly too, Information Management and IT specialists must be able to understand records' retention requirements when planning and designing agency business systems.

The RDA will be published on the PROV website as citizens are entitled to know how long records of government must be retained and which records will be kept as State archives.

Unless the class refers to more than one category of record, it is suggested that the description starts with 'Records of continuing value that document…' (for classes that are State archives), 'Records relating to …' or 'Records documenting …'.

Below are some tips that may help :

- ***Include examples of the records covered in the class***. Use an 'includes' or 'such as' statement so the description is not prescriptive and allows the class to be used for similar records that have not been explicitly described. For example, 'Records documenting the implementation of new projects and programs. Includes strategies, briefing notes and correspondence with other agencies and organisations'.

- ***Avoid the use of proper nouns***. This includes names of the agency, business systems or legislation that may limit the application of a class. The less specific the class wording, the more widely it can be applied. For example, a class that reads 'Records documenting the monitoring of health and conditions under section 22 of the *Occupational Health and Safety Act 2004*' could only be applied to monitoring records created under that Act and section. If the section or Act changes, the class could not be used for monitoring records made under the new section or Act. If the class was meant to cover records of monitoring of health and conditions, irrespective of particular legislation, then it would be better to describe the class as 'Records documenting the monitoring of health and conditions according to occupational health and safety legislation'. If the Act had to be mentioned, it could then also include a sentence like '(including under section 22 of the *Occupational Health and Safety Act 2004*')'.

- ***Avoid descriptions that are open to interpretation***, such as 'major', 'minor' or 'significant'. If it is important to include such descriptions to differentiate the records involved, add some interpretative information. For example, 'Records documenting the provision or receipt of advice which has a significant impact and far reaching implications on the way public health is managed, impacting on the lives of the entire population'.

Example of a record class scope note:

Significant Collection Development and Management Records

Records of continuing value that document:

- master control records for the collection, including databases and management systems for audio-visual material, registers, indexes, and lists, and associated data dictionaries supporting these systems and databases
- documentation establishing rights to the management of items in the collection, including the right to copy, distribute and provide access, as well as important contextual information about the provenance of individual collection items. Includes evidence of item acquisition such as donation agreements, undertakings and bequests
- histories of the items in the collection, including contextual information around item creation, acquisition details including any legal advice, preparation, conservation/preservation and general condition reports, valuation, loans and returns, and de-accessioning. Includes details of item loss due to theft, damage or destruction
- submissions for funding to acquire items for the collection
- advice on contemporary, retrospective and Indigenous acquisitions issues
- repatriation of collection items where the agency was the custodian only. Includes arrangements for the return of the item/s to the legitimate owners
- major projects to improve the content or management of the collection, such as relocation of the collection to new sites; establishment of new services such as in-house conservation services; acquisition of items by significant artists, or that are the subject of public interest or controversy, or that are categorised as high-risk (originate from conflict zones, are subject to strong illicit trade, comprise human remains, have similarities with items listed as being stolen etc.).

Source: PROS 17/03 Retention and Disposal Authority for Records of Museum and Gallery Functions (class 2.1)

3.2.3   Allocating class retention requirements

Each class you have created and described needs a disposal status and action that is appropriate for all of the records in the class.

For example:

- 'Permanent - Retain as State archives'; or
- 'Temporary - Destroy 7 years after action completed'.

Make sure triggers for destruction relate to identifiable specific events or points in time. The common trigger for most records is 'after action completed', for example, 'Destroy 20 years after action completed'. Other possibilities might be 'Destroy 75 years after date of birth' or 'Destroy 15 years after separation'. You may also wish to consider how the trigger would be implemented in digital or hybrid systems.

PROV has endorsed the following list of disposal triggers developed by the Australasian Digital Recordkeeping Initiative(ADRI) which support automation of triggers in EDRMS. These triggers should be used in RDAs where applicable.

PROV disposal actions and approved disposal triggers:

PROV requires the following *disposal actions* to be used:

- Retain as State archives
- Destroy
- Transfer.

Together with the following *triggers* indicating when the disposal action should be taken:

- Action completed
- Appointment
- Created
- Date of birth
- Date of death
- Disposed of
- Expired
- Issued
- Reference use ceases
- Separation
- Superseded
- Terminated.

4. More information

For more information on RDAs go to:
https://www.prov.vic.gov.au/recordkeeping-government/how-long-should-records-be-kept/retention-and-disposal-authorities-rdas

For the step-by-step on RDA development go to:
https://www.prov.vic.gov.au/recordkeeping-government/how-long-should-records-be-kept/rda-development-step-by-step

For more information about appraisal go to:
https://www.prov.vic.gov.au/recordkeeping-government/a-z-topics/appraisal

For information about Online Retention and Disposal Application (ORDA) go to:
https://www.prov.vic.gov.au/recordkeeping-government/learning-resources-tools/orda