

Queensland State Archives

Guideline for the Development of Retention and Disposal Schedules

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Executive summary

The *Public Records Act 2002* prohibits the disposal of public records without the permission of the State Archivist. This permission is usually given through authorised Retention and Disposal Schedules. These Guidelines outline the processes involved in developing and seeking approval of Retention and Disposal Schedules specific to a public authority.

Developing a Retention and Disposal Schedule also offers a number of benefits to public authorities. These can include:

- Increased knowledge of records' holdings in the organisation.
- Identification of areas where records are not being created.
- Identification of records which can be destroyed, leading to cost and resource savings.
- Identification of permanent and vital records.

The appraisal of records and development of a Retention and Disposal Schedule is a shared responsibility between the public authority and Queensland State Archives (QSA). The public authority has responsibility for:

1. Planning the project and assigning resources.
2. Researching the functions and activities of the public authority.
3. Identifying records in all formats, including records in business information systems, and research appropriate retention periods.
4. Developing draft Retention and Disposal Schedules and preparing supporting appraisal documentation.
5. Submitting draft schedules and supporting appraisal documentation to QSA.
6. Responding to requests from QSA for any further information.
7. Implementing the authorised schedule.
8. Reviewing the schedule on a regular basis.

QSA has responsibility for:

1. Providing advice on the development of the schedule.
2. Identifying records required for permanent retention as State archives.
3. Analysing retention and disposal actions proposed by public authorities to identify consistency and suitability.
4. Authorising Retention and Disposal Schedules.

The process involved in developing a schedule is shown in diagram 1 on page eight of these Guidelines.

The Guidelines also outline some issues to consider when implementing, maintaining and reviewing schedules.

1: Introduction

Scope

These Guidelines apply to all public authorities as defined in Schedule 2 of the *Public Records Act 2002*.

Purpose

To provide advice to public authorities on how to research, develop, document and gain approval for a Retention and Disposal Schedule. Advice is also provided on implementing, maintaining and reviewing an approved schedule.

Authority

These Guidelines are issued by the State Archivist under section 25(1)(f) of the *Public Records Act 2002*.

Legal and regulatory framework

The *Public Records Act 2002* prohibits the disposal of records without the permission of the State Archivist. This permission is usually given through authorised Retention and Disposal Schedules, which set out minimum retention periods for different groups of records.

This guideline complements QSA's *Guideline for the Implementation of Retention and Disposal Schedules* which is designed to assist public authorities to sentence and dispose of their records once they have an approved Retention and Disposal Schedule.

Information Standard 31: Retention and Disposal of Public Records requires public authorities to appraise and retain records in accordance with their legal, business, administrative, information and historical value, and other criteria relevant to the record or related business activity. To comply with principle 1, Compliant and Accountable, in *Information Standard 40: Recordkeeping* (IS40) public authorities must develop a comprehensive Retention and Disposal Schedule and submit this document to the State Archivist for approval.

Roles and responsibilities

The appraisal of records and development of a Retention and Disposal Schedule is a shared responsibility between QSA and public authorities. It is the role of the public authority to:

1. Plan the project and assign resources.
2. Research the functions and activities of the public authority.
3. Identify records in all formats, including records in business information systems, and research appropriate retention periods.
4. Develop draft Retention and Disposal Schedules and prepare supporting appraisal documentation.
5. Submit draft schedules and supporting appraisal documentation to QSA.
6. Respond to requests from QSA for any further information.
7. Implement the authorised schedule.
8. Review the schedule on a regular basis.

The role of QSA is to:

1. Provide advice on the development of Retention and Disposal Schedules.
2. Identify records required for permanent retention as State archives.
3. Analyse retention and disposal actions proposed by public authorities to identify consistency and suitability.
4. Authorise Retention and Disposal Schedules under section 13 of the *Public Records Act 2002*.
5. Develop general Retention and Disposal Schedules to cover functions and activities common to many authorities.

It is expected that there will be regular contact between QSA and the public authority during the development of Retention and Disposal Schedules. These Guidelines cannot cover every eventuality and public authorities are encouraged to seek advice from QSA on any issues that arise during the course of the project.

Methodology and relationship with DIRKS

Designing and Implementing Recordkeeping Systems (DIRKS) is a comprehensive methodology for designing or re-designing recordkeeping systems. It can serve a number of purposes including:

- Ensuring the creation and capture of records.
- Ensuring vital records are identified and managed appropriately.
- Managing records access and security.
- Improving business processes and systems.
- Developing new systems with adequate recordkeeping functionality.
- Facilitating the purchase and implementation of off-the-shelf records management software.
- Ensuring records are kept of outsourced functions.
- Creating and implementing a business classification scheme.
- Specifying and applying recordkeeping metadata.¹

DIRKS is endorsed by the International Standard *AS ISO 15489-2002 Records Management*.² Both the National Archives of Australia and State Records New South Wales have developed manuals explaining the methodology in full.

Public authorities that are undertaking a broad review of their recordkeeping systems and processes are encouraged to become familiar with the full DIRKS methodology. However, it is not mandatory to undertake all activities as described in the methodology.

To assist public authorities concentrating on the development of Retention and Disposal Schedules, these Guidelines provide a reduced and targeted version of the DIRKS methodology, tailored for the Queensland environment. They also provide information on QSA's requirements and the schedule approval process.

¹ State Records NSW (2007) *DIRKS Manual - Introducing the DIRKS Methodology*. Available online: <http://www.records.nsw.gov.au/recordkeeping/dirks/introducing-the-dirks-methodology/introducing-the-dirks-methodology/?searchterm=DIRKS%20Manual%20-%20Introducing%20the%20DIRKS%20Methodology> .

² The methodology, while known as DIRKS in Australia, is referred to as DIRS (Designing and Implementing Records Systems) in the standard.

Acknowledgements

QSA wishes to acknowledge that parts of these Guidelines have drawn on a number of publications by other archival authorities. Key publications used, in addition to those cited in footnotes, are:

National Archives of Australia (2007) *The DIRKS Manual: A Strategic Approach to Managing Business Information*. Available online at <http://www.naa.gov.au/records-management/publications/dirks-manual.aspx> .

State Records Authority of NSW (2007) *Procedures for Disposal Authorisation*. Available online at <http://www.records.nsw.gov.au/recordkeeping/government-recordkeeping-manual/rules/procedures/disposal-authorisation/disposal-authorisation/?searchterm=Procedures%20for%20Disposal%20Authorisation>

State Records Authority of NSW (2007) *Strategies for Documenting Government Business: The DIRKS Manual*. Available online at <http://www.records.nsw.gov.au/recordkeeping/government-recordkeeping-manual/guidance/recordkeeping-in-brief/recordkeeping-in-brief-17/?searchterm=Strategies%20for%20Documenting%20Government%20Business:%20The%20DIRKS%20Manual>

2: Before you begin

2.1 Understanding appraisal

Appraisal is the process of evaluating business activities to determine which records need to be captured and how long the records need to be kept to meet business needs, the requirements of organisational accountability and community expectations.³ This approach is also known as functional appraisal. Appraisal decisions are documented in a Retention and Disposal Schedule. For this reason, the process of developing a schedule may also be referred to as appraisal, or an appraisal project, in these Guidelines.

Previous approaches to developing Retention and Disposal Schedules usually involved undertaking a survey or inventory of what records were held by an organisation and determining how long they need to be kept. Unlike this approach, functional appraisal has a stronger focus on the context of the records and the functions and activities of the organisation that the records document. It generally allows for broader and more flexible coverage than records-inventory based approaches. However, it is recognised that a records inventory is one useful research tool that can support the functional approach (see section 3.5).

Queensland public authorities are required to develop function-based Retention and Disposal Schedules to cover records unique to the authority.

2.2 Definitions

Key terms used in these Guidelines are defined below. These and other records management terms are defined in QSA's [Glossary of Archival and Recordkeeping Terms](#).

Activity: the major tasks performed by an organisation to accomplish each of its functions. An activity should be based on a cohesive grouping of transactions producing a singular outcome.

Disposal: the final decision concerning the fate of records. Disposal includes:

- a) keeping all or part of a record;
- b) destroying or damaging, including deleting, a record, or part of it; and
- c) abandoning, transferring, donating, giving away or selling a record or part of a record.

Function: the largest unit of business activity in an agency or jurisdiction. Functions represent the major responsibilities that are managed by an agency to fulfil its goals. Functions are high-level aggregates of the agency's activities.

Legacy Records: records either created by an agency in the past under non-current business functions or systems or inherited from another agency because of a transfer of functions.

Retention and Disposal Schedule: there are two main types of schedules:

- a) Functional retention and disposal schedules authorise the retention and disposal of records unique to a specific agency.
- b) General retention and disposal schedules authorise the retention and disposal of records common to more than one agency. Such records may include:
 - i) general administrative records;
 - ii) common records that relate to unique functions; and
 - iii) records relating to the unique functions of like agencies.

³ Standards Australia (1996) AS 4390.1 *Records Management* Clause 4.3.

Retention period: the minimum period of time that records need to be retained before their final disposal. It is usually based on an estimate of the frequency of current and future use and takes into account various statutory and regulatory provisions.

2.3 *Planning the project*

Developing a Retention and Disposal Schedule to cover all core-business records of a public authority is a significant project and, particularly in medium and large authorities, will require dedicated staff resources. For this reason, careful planning is important.

Stages of the project

There are five main stages in developing a Retention and Disposal Schedule:

- Establishing a project plan and identifying resources, timeframes and deliverables.
- Undertaking contextual and background research, including records holdings.
- Identifying retention requirements and stakeholder consultation.
- Writing the schedule and its supporting appraisal documentation.
- Seeking approval.

These Guidelines provide advice on each of these stages. Diagram 1 on the following page outlines the process, highlighting the roles and responsibilities of the public authority and QSA.

It is important to consider ongoing issues early in the project. For example, the documentation produced to support the schedule, including legislative mapping, records survey and retention period justifications, should be sufficiently detailed to be useful for future reviews of the schedule and recorded in a structured, traceable and easily modified format. The final section of these Guidelines provides some advice on implementing, maintaining and reviewing a Retention and Disposal Schedule.

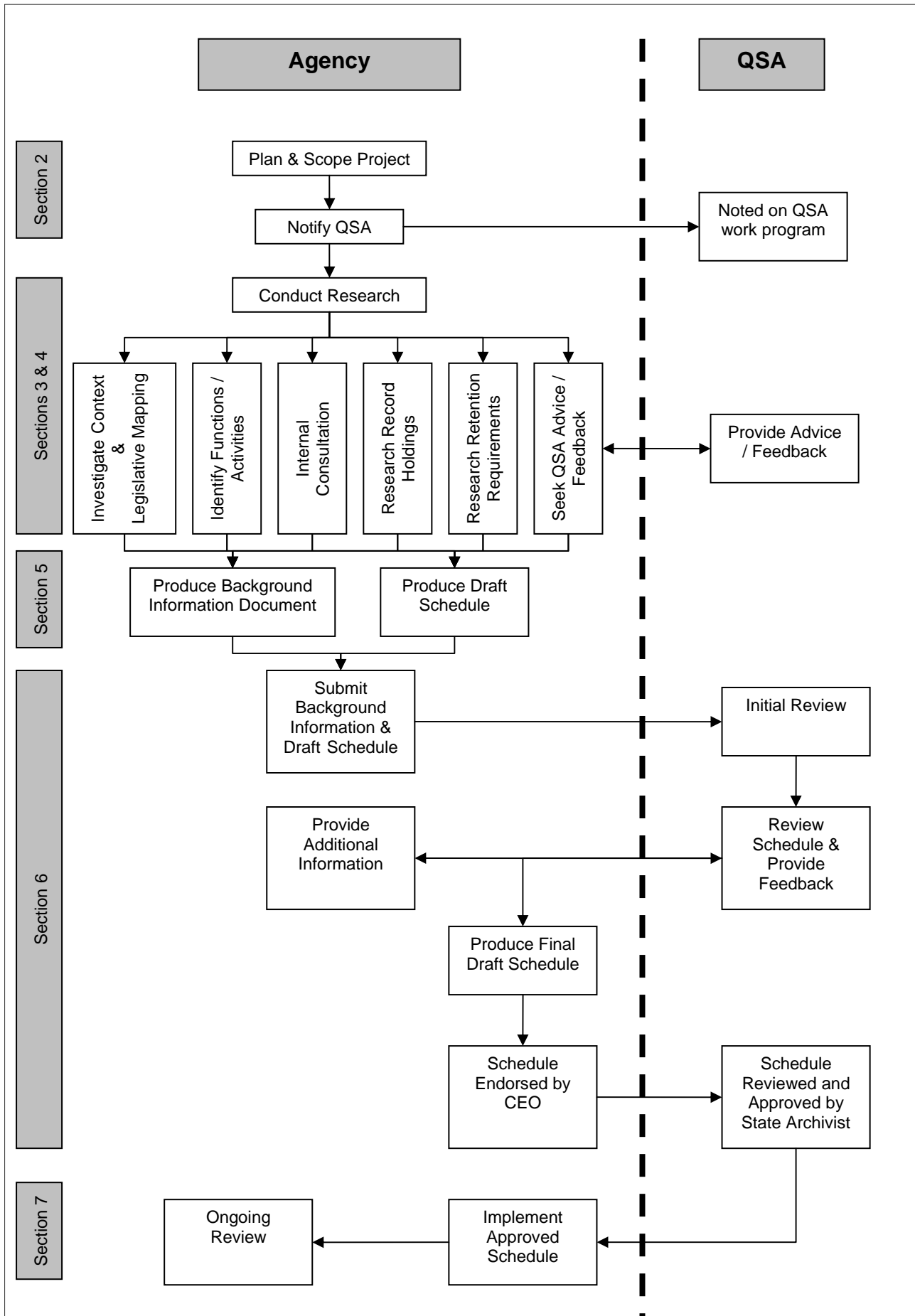


Diagram 1: Process for developing a Retention and Disposal Schedule

Gaining senior management support

Developing a schedule is a demanding and time-consuming project with potentially wide-ranging implications for the organisation. For these reasons, it is important to ensure senior management of the organisation understand and support the project. This support will help ensure adequate resources are allocated to the project and that appropriate staff of the public authority are available for consultation during the development of the schedule.

As well as meeting legislative requirements, the project can generate a number of benefits that senior management should be aware of. These include:

- Increased knowledge of records' holdings in the organisation.
- Identification of areas where records are not being created.
- Identification of records which can be disposed of, leading to cost and resource savings.
- Identification of permanent and vital records. Vital records are those without which the authority cannot operate, which are required to re-establish the authority in the event of a disaster.

It is important to make sure that promised benefits are delivered. For example, the identification of vital records is a potential advantage of an appraisal project, rather than a key requirement. Identification of areas where records are not being created will only occur if the research examines whether necessary records of all functions and activities exist. Reduction in storage costs will only occur if resources are allocated for sentencing and destroying appropriate records after the schedule is approved.

Staffing

Developing a Retention and Disposal Schedule requires detailed research and analysis and therefore a substantial time commitment. It is not a 'spare time' activity for existing staff and thought must be given to how to best resource the project. Options include:

- Moving a staff member currently within the organisation offline to work on the project and backfilling their position.
- Employing temporary staff to undertake the project.
- Engaging consultants or a shared service provider.

Each approach has both benefits and weaknesses, as outlined in the table below:

Approach	Benefits	Costs
Moving staff member offline	Have existing knowledge of the public authority, its context and records. Knowledge gained through project retained by authority.	Cost to backfill position.
Employing temporary staff member	May have greater experience in developing schedules. Less disruption to existing work.	Potential loss of knowledge gained through project. Cost to employ staff.
Consultant	Experience in developing schedules. Less disruption to existing work.	Potential loss of knowledge gained through project. Cost of consultant's fees.

Table 1: Approaches to staffing the Retention and Disposal Schedule project

Regardless of what approach is selected, essential skills and knowledge required to undertake the project includes:

- Knowledge of the organisation.
- Knowledge of best practice records management.
- Analysis and research skills, including functional analysis.
- Interviewing and consultation skills.
- Understanding of records and recordkeeping systems.
- Understanding of QSA's requirements.

These requirements may be met by assembling a team of people, not necessarily all full-time, to work on the project. For example, a staff member with responsibility for records and recordkeeping systems may work closely with the consultant, bringing knowledge of the authority and its practices.

When using temporary staff, consultants or shared service providers, it is essential that the project is actively managed by the public authority and strategies are put in place to transfer knowledge during and at the conclusion of the project. It should be noted that QSA will not communicate directly with consultants without the knowledge of the public authority.

Tip: Contracts for consultants should make it clear that they are responsible for documenting reasons for retention recommendations and contextual information in accordance with QSA's requirements, not just preparing a draft Retention and Disposal Schedule. The contract should also specify that the draft schedule and supporting documentation must meet the standard required by QSA and that the consultants are available throughout the approval process. Without these conditions, the public authority may have to undertake substantial revision to the schedule without the aid of the original consultant.

It is also important that staff and/or consultants with detailed knowledge of the project are available to consult with QSA during the preliminary review and approval processes. For more information on this, see section six of the Guidelines.

Stakeholders

It is useful to identify key internal stakeholders at the commencement of the project. Stakeholders might include business area managers, legal staff and internal auditors, and provide essential expertise on the value and uses of records in the public authority. Information technology staff are also important stakeholders, especially in identifying the various business systems in which records might be held and developing an understanding of how these records are managed. These stakeholders may form a reference group to support the project, or be consulted on an individual basis.

The interests of external stakeholders, whether other government bodies, private organisations, client / customer groups or the wider community, should also be taken into account during the appraisal process.

Timeframe

The project timetable should allow sufficient time for the key stages of the project:

- Research.
- Drafting and internal review processes.

- The preliminary review of the draft schedule by QSA and negotiation of changes.
- Sign off by the chief executive and/or senior management of your organisation before formal submission.
- Formal submission of the schedule to the State Archivist for approval.

How long an appraisal project will take depends on the size of the public authority, how many functions it undertakes, decisions on the scope of the project as described in section 2.3, and the available resources.

For a medium-sized public authority with a limited range of functions and one person working full-time, it may take approximately six months to develop a schedule covering current records and a small legacy collection. In contrast, for a large public authority with a wide range of functions, a history of poor recordkeeping, many offices to cover and extensive legacy collections, it may take considerably longer, between two to four years and require a small team of staff to identify and appraise all current and legacy records. However, in this situation a phased approach could be adopted in consultation with QSA.

Following preparation of the draft, it is submitted to QSA for preliminary review. The amount of time required for the review stage through to formal approval depends on a number of factors including:

- Size of the organisation.
- Quality of work submitted.
- Level of detail in the draft schedule and supporting information.
- Complexity of the schedule (for example, whether extensive legacy holdings or a large number of functions are covered).
- Timeliness of responses from public authority staff on issues raised by QSA.
- Number of major schedules already under review by QSA.

The review and approval process by QSA, following submission of a draft, may take up to six months, potentially longer for particularly complex or contentious projects.

Contacting Queensland State Archives

Once a project to develop a Retention and Disposal Schedule has been approved within the public authority, contact QSA.

This early contact allows QSA to:

- Ensure that the final product has the greatest chance of being approved by the State Archivist, without the need for major revisions.
- Log the project in the QSA work program.
- Assign a responsible appraisal archivist to provide support and advice for the duration of the project and review of the draft schedule.
- Clarify any questions or issues relating to QSA requirements.

Contact the Manager, Agency Services on telephone 3131 7777 or email info@archives.qld.gov.au. Please include the word 'appraisal' in the subject line of the email.

Public authorities are encouraged to contact their assigned appraisal archivist for advice on any issues that arise during the development of the Retention and Disposal Schedule.

2.4 Scope of the project

General administrative vs. core functions

Generally, the Retention and Disposal Schedule will cover all the core or non-administrative general functions of the public authority. Disposal coverage for general functions such as financial management or human resources is authorised through the *General Retention and Disposal Schedule for Administrative Records* (GRDS) issued by QSA.

In addition to the GRDS, some sector-specific schedules have been prepared to cover all the functions of public authorities in a certain sector. For example, TAFEs, universities and local governments are covered by sector-specific schedules and therefore do not need to develop individual Retention and Disposal Schedules.

Central and regional offices and statutory bodies

The Retention and Disposal Schedule should include records of any and all regional offices of the public authority. As there is often duplication in records held across offices – for example, multiple copies of policies – it is important to take a holistic view of the organisation to ensure records are not retained unnecessarily.

In some organisations, regional offices perform different functions or activities from a head office, such as delivering services rather than setting policy. These differences should be included in the schedule. The project plan should allow sufficient time to consult with all relevant parts of the organisation to ensure appropriate coverage.

Some public authorities may have small statutory bodies, boards, advisory committees or similar organisations attached to them and therefore also need to include these related organisations in the scope of the project.

Legacy records

Most public authorities have collections of older records that have not previously been appraised. Sometimes these records have been inherited from predecessor organisations and/or document functions and activities no longer performed by the public authority. Public authorities are required under the *Public Records Act 2002* to inform QSA of records in their custody that are over 25 years old.

The requirement for public authorities to have a comprehensive, approved Retention and Disposal Schedule applies to all records in the control of an authority, both legacy and current. In scoping the project, it is necessary to be aware of all existing holdings that require disposal coverage. Where the holdings are extensive, it may be necessary to allow more time in the project plan. Alternatively, a phased approach may be adopted where disposal coverage is initially sought for current records and the approved schedule is later revised to include legacy records, usually in the form of an attachment to the schedule (see 'Legacy records' in section 5.3).

Business classification scheme and thesaurus

A project to develop a Retention and Disposal Schedule is often combined with the development of a Business Classification Scheme (BCS) and thesaurus to control the titling of records. While this can be a useful approach as similar research is required for both, there is potential for some conflict between the requirements of the different products. Developing a BCS and thesaurus focuses on developing a new approach to creating, classifying and managing files, whereas a Retention and Disposal Schedule should apply to past, current and likely future records holdings, whether paper or electronic file-based records or records in non-standard formats such as business systems, datasets, maps, websites or photographs.

Tip: When projects are being completed in tandem, it is important to be aware of these challenges and ensure that the disposal schedule is based on an analysis of current and past records holdings, as well as an analysis of functions and activities.

However, it is important to note that:

- Scope notes for functions and activities do not include file titling advice.
- Function and activity descriptors may be modified to ensure they meet these Guidelines and sufficiently describe the context of the function and activity records (eg. Include legislative references).
- Unnecessary repetition is removed and activities which are covered by the GRDS are removed. Only activities where records are not covered by the GRDS and are unique to a function/ activity context are included in the Retention and Disposal Schedule.

These Guidelines focus on the development of Retention and Disposal Schedules and do not include advice on the preparation of BCS and thesauri.⁴

⁴ For guidance on this, see the DIRKS manuals and State Records (2003) *Guideline 15: Developing and Implementing a Keyword Thesaurus*. Available online at <http://www.records.nsw.gov.au/recordkeeping/government-recordkeeping-manual/guidance/guidelines/guideline-15/?searchterm=guideline%2015%20keyword%20thesaurus> .

3: Background research

3.1 Overview

Developing a Retention and Disposal Schedule is not simply a form-filling, checklist-based exercise:

‘Applying guidelines or checklists in the appraisal process...only works if such application is based on a rich understanding ... of the history of the records creator, its official functions and legal mandates, its internal organisational structure, its decision-making processes, its records-creating procedures, and the changes in all of these over time, as well as a similar understanding of the often subtle characteristics of the records themselves’.⁵

As indicated in the quote above, the necessary research is both top-down and bottom-up.

Knowledge of the public authority, its administrative and legislative context, and its functions and activities needs to be linked to a detailed analysis of its business processes and the records these processes create. Neither one of these approaches is sufficient on its own.

It is important to understand what the public authority does. Analysis of the functions and activities of the authority helps establish what records it is (or should be) creating, and is the starting point for identifying any legal or compliance-oriented retention requirements.

The analysis of records and business processes gives an understanding of how records are created in practice and how they support business processes. This approach enables the identification of record classes and business requirements to retain records.

It should be emphasised that the research involved does not necessarily follow a linear process. For example, options include:

- Starting with investigating the context of the public authority.
- Starting with a review of existing records and recordkeeping systems.
- Using information which has been gathered for other projects, such as business process redesign.

It is an iterative process: a discussion of the functions and activities of the organisation may lead back into an investigation of the legislative basis for that work, or reveal previously unknown recordkeeping systems.

This section outlines the background research involved in developing a Retention and Disposal Schedule. The following sections provide advice on identifying retention requirements, documenting background research and retention requirements in accordance with QSA’s requirements and the approval process.

3.2 Sources for research

Written sources

A number of written sources are useful in the research supporting an appraisal project. Some of these are identified below.

⁵ Cook, Terry (1991). *The archival appraisal of records containing personal information: A RAMP study with guidelines*. Paris: UNESCO. Available online at <http://www.unesco.org/webworld/ramp/html/r9103e/r9103e00.htm> .

Legislation

Researching and documenting relevant legislation is an essential part of developing a Retention and Disposal Schedule. Legislation:

- May set out the role and powers of the public authority.
- May contain requirements to create records either implicitly or explicitly, for example, an application.
- May set out processes that must be followed, with implicit requirements to create records, for example, “applications must be assessed” implies that assessment documents will be created.
- Rarely, but occasionally, contains explicit information on how long records must be kept.
- May contain implicit information to help identify retention periods, for example, length of appeal period.

To do this it is strongly recommended that public authorities developing Retention and Disposal Schedules undertake to map their legislative requirements. This assists in identifying all explicit and implicit recordkeeping requirements prescribed in legislation and ensures these are covered in the schedule. Another benefit of legislative mapping is that, by providing a copy of this mapping to QSA when the draft schedule is submitted for review, the review time may be significantly decreased.

Legislative mapping involves a public authority listing all of the provisions under the relevant legislation, noting any record implications (such as the creation of records or their retention) and, where appropriate, noting the reference number where these records are covered in the Retention and Disposal Schedule. A legislative mapping template has been provided in Appendix D.⁶

Public authorities should check all Acts and subordinate legislation (regulations) that they administer as well as any regulatory legislation to which they are subject (although it may not be necessary to map those sections which do not apply to the public authority). It is also important to identify any repealed legislation which affected past activities and therefore legacy records. Business areas that administer the legislation will normally be able to provide advice.

There is usually no need to examine legislation common to all public authorities, such as the *Workplace Health and Safety Act 1995*, as the requirements of this type of legislation have been incorporated into QSA’s *GRDS*.

Tip: Current consolidated legislation is available online at <http://www.legislation.qld.gov.au/OQPChome.htm>. Consolidated legislation is a version of the Act containing all amendments. This website also contains Acts as passed since 1991, including some that have now been repealed. The State Library of Queensland holds copies of all legislation, both current and repealed.

⁶ See QSA’s Public Records Brief *Identifying & Mapping Legislative Recordkeeping Requirements* available at <http://www.archives.qld.gov.au/government/Publicationsbytype.asp> for more information on undertaking legislative mapping and an example of a completed mapping document.

Ministerial Portfolio Statements

- Useful for core government agencies.
- Include information on outputs, key strategies and achievements for each agency within a portfolio.
- May include information on legislation and relationships with other public authorities.

Annual report

- Identifies business activities of the organisation.
- May identify various business systems that contain records, for example, by reporting on the implementation of new systems to manage business processes.
- Identifies relevant legislation.

Past annual reports are useful for historical analysis supporting the appraisal of legacy records. They may be found in the library of the public authority or at the State Library of Queensland.

Corporate plans and strategies

- Identifies functions of the organisation.

Organisational charts

- Identifies key parts of the organisation and provides overview of work.
- Can be used as a 'checklist' to identify areas for research and consultation.

Policy and procedure documents for business areas

- Identifies activities and processes.
- Identifies requirements to create records, explicitly or implicitly.
- May identify business systems that contain records.

Strategic Recordkeeping Implementation Plan (SRIP)

- Contains information on size, scope and history of the public authority.
- Identifies historical records holdings.
- Lists legislation affecting the public authority.
- May provide additional information on recordkeeping systems and processes.

Publication Scheme

- Public authorities are required to publish a Publication Scheme in accordance with the *Right to Information Act 2009*.
- Lists the classes of information that the agency holds.
- Describes the terms on which the agency will make the information available (including any charges that may be incurred).

Business Classification Scheme and thesaurus

- If current, will provide functions and activities for structure of disposal schedule.
- If older, may provide insight into previous records' holdings.

Previous disposal schedules

- While outdated, will provide insight into previous records holdings and provide a starting point for research.
- May still have valid disposal actions and can be included in the proposed new schedule with updated and validated information.
- Identifies records holdings, including legacy records.

Interviews and consultation

Interviews and workshops or focus groups with relevant staff are a useful means of gathering information to confirm and obtain feedback on other research. They can also be used to promote and gain support for the project. Consultation may also be in the form of written feedback on drafts.

The choice of interviews or workshops depends on the information being sought (eg. level of detail) and the preference of participants. For example, a senior business manager may prefer an interview, while a number of people from a business area could participate in a workshop to identify their business processes and recordkeeping requirements.

Prepare thoroughly for the interview or workshop. Brief the participants beforehand on the purpose and benefits of the project, and the purpose of the consultation. This might include researching:

- The functions and activities of the operational area, and how these fit into the overall purpose and structure of the organisation.
- What records and recordkeeping systems result from these functions and activities.
- Any legal or other recordkeeping requirements relating to the records.
- The interviewees' opinions on how long the records they use are required for business purposes.
- Providing draft documentation for comment.

Tip: Be prepared to answer general records management questions as participants may use the opportunity to ask about any aspects of recordkeeping.

While an appraisal project has a number of stages, it is important not to 'over-interview' participants. Consultation should occur after preliminary research, enabling the interviewer to ask informed and relevant questions based on some understanding of their business environment. Ideally, participants would be interviewed once during the development process, with follow-up questions for clarification if necessary. The draft schedule can be circulated to internal participants for feedback once completed.

Appendix A contains suggested interview questions to help prepare for consultation. These can be adapted for use in a workshop environment.

3.3 Investigating context

Investigating the context of the public authority is a key step. It helps develop an “understanding of the administrative, legal, business and social contexts in which it operates so that it can identify the major factors that influence its need to create and maintain records”.⁷

Questions to be addressed in this research include:

- What type of public authority is it? What are the defining characteristics and corporate culture of the public authority?
- What is the official basis of the public authority and why was it established?
- What is the history of the public authority?
- What does the public authority do? What did it do in the past that it does not do now?
- What is its business environment?
- Who are its stakeholders? Who does it report to?
- What is the structure of the public authority? Where are the various units located if there is more than one, and what is the business activity carried out by each?
- Does the public authority have any administrative links to other public authority or private organisation?
- What legislation is administered by the public authority?
- What legislation or standards affect the role or the operation of the public authority?
- What technology does it use to create and store records?

This contextual information is very important in clarifying the scope of the proposed Retention and Disposal Schedule. Some of this information can be found in the public authority’s *SRIP*, particularly the size, scope and history of the public authority, lists of relevant legislation and some information on the recordkeeping environment. This information should be updated if necessary.

Investigating the history of the public authority supports the appraisal of legacy records. Identifying links to other public authorities and stakeholders may reveal co-operative ventures or partnership arrangements with recordkeeping implications – for example, there may be a need to reach agreement on who is responsible for managing records generated in partnerships. In addition, knowledge of the relationships between public authorities also promotes consistency in appraisal decisions. For example, the courts and the Public Trustee both have a role to play in the administration of wills.

It is important to identify and become familiar with any legislation governing the public authority’s work, its organisation and structure. Annual reports, corporate strategies and plans are also useful sources at this stage. Legislation and standards affecting the public authority may also contain recordkeeping requirements, which can be noted for later reference in the relevant functions, activities and record classes of the Retention and Disposal Schedule.

⁷ Standards Australia (2002) *AS ISO 15489.2 Records Management Part 2: Guidelines*. Clause 3.2.2.

3.4 Identifying and describing functions and activities

Functions are the largest unit of business activity in a public authority or jurisdiction. They represent the major responsibilities that are managed by a public authority to fulfil its goal and are high-level aggregates of the public authority's activities.⁸

Activities are the major tasks performed by an organisation to accomplish each of its functions. An activity should be based on a cohesive grouping of transactions producing a singular outcome.⁹ Transactions are the individual steps or actions involved in an activity or process – for example, in a licensing process, transactions may include:

- receive application,
- assess against criteria,
- approve or reject,
- enter decision on licensing system,
- prepare response, and
- issue licence if approved.

Examining the transaction level helps ensure that there is no overlap between activities and identifies the types of records being created.

Example: Identifying functions and activities

There are a number of decisions to be made in identifying functions and activities. To use an administrative example, all public authorities have a human resources function. However, this may be too broad to be useful – there are a number of other functions within it. So instead, separate functions of personnel, workplace health and safety and establishment were identified.

What activities are performed under a function such as personnel? By talking to staff in the personnel area, you might identify activities such as recruitment, staff training, processing payroll and leave entitlements, and retirement and other separations. However, by talking to managers in business units, you might identify other activities such as performance management and discipline or grievances. Remember that different aspects of a function, or different activities, may be performed in many different business areas.

It is also important to understand the boundaries and relationships between different functions and activities. For example, in processing payroll, what is the relationship between the personnel and financial management functions? Do return to work plans after an accident fit within Workplace Health and Safety or Personnel?

Functions and activities provide the structure for a Retention and Disposal Schedule. Some public authorities may already have a current business classification scheme and

⁸ QSA (2004) Glossary of Archival & Recordkeeping Terms.

<http://www.archives.qld.gov.au/downloads/GlossaryOfArchivalRKTerms.pdf>

⁹ State Records NSW (2003) Glossary of Recordkeeping Terms.

<http://www.records.nsw.gov.au/recordkeeping/government-recordkeeping-manual/introduction/glossary-of-recordkeeping-terms/glossary-of-recordkeeping-terms/?searchterm=glossary%20of%20recordkeeping%20terms>

can adopt this for use in the Retention and Disposal Schedule. As noted in 4.2, this may need to be amended following research into records holdings and retention requirements.

Written sources, such as legislation, annual reports and policy and procedure manuals, are valuable for identifying functions and activities. These should be tested and confirmed in consultation with relevant business areas.

Functions are not the same as organisational structure and a number of business units may carry out different aspects of the one function. For example, while one area may approve liquor licences and another may investigate alleged breaches of licence conditions, these two activities would still fall within the liquor licensing function.

In identifying functions and activities:

- Consider what makes the public authority unique and include these functions and activities: do not include general administrative functions or activities that are common to many public authorities unless the public authority has a specific and unique role in relation to it.
- Write scope notes for each function and activity that give a succinct explanation of what is, and what is not, covered by the term. Wherever possible, include relevant legislative references to clarify the basis of the function or activity.
- Review the scope notes, checking that each function and activity is unique to the public authority and do not overlap.
- Test the analysis in interviews and workshops with relevant staff members.

Where the prior agreement of QSA has been obtained, drafts may be submit to QSA in functional sections during the preliminary review process.

Relationship to GRDS activities

A number of **activities**, such as policy, advice, meetings and procedures are common to many functions, whether administrative or unique to a public authority. In analysing the functions specific to the public authority, note which of these common activities occur under the specific functions.

Coverage for these common activities, regardless of the 'parent' function, is included in the GRDS. It is necessary to determine whether the GRDS coverage is sufficient, or whether the activities should be included in the public-authority specific schedule. For more information on this, see section 4.3.

Functions that are covered in the GRDS should only be included in a public authority's schedule if they have a specific role in relation to it. For example, the Department of Industrial Relations would include a function relating to Workplace Health and Safety Regulation in their schedule. However, they would also use the GRDS for records relating to incidents with their own staff (an administrative, rather than key functional, role).

3.5 *Researching records holdings*

In developing a comprehensive Retention and Disposal Schedule, it is important to be aware of all record holdings of the public authority, regardless of age or format. Depending on the quality of existing recordkeeping knowledge and practice, this may involve simply interviewing staff with responsibility for recordkeeping and relevant business units, or require a detailed discovery project.

A starting point for enquiry is records managers or other recordkeeping staff, who should be aware of current and past centralised recordkeeping systems and any old records in offsite storage. In addition, business units may have their own paper or electronic systems to record different business processes, such as series of case files or transactional databases. When researching legacy records, staff who have worked for the public authority for a long period of time are often a good source of knowledge on older records and recordkeeping practices, regardless of whether they worked in a formal records position.

Tip: When talking to staff in business units, be aware that they may not regard the systems they use as 'records' or 'recordkeeping systems' so ask questions such as 'what systems do you use when doing your work?'.

To locate physical records, it can be useful to simply look for filing cabinets, storerooms and rows of binders (which often indicate an informal yet important group of records) when visiting different office areas. A review of records held at off-site storage facilities should also be made.

For electronic systems, information technology staff would be familiar with the key systems in use in the organisation. The Register of Strategic Information (ROSI) can also be searched by the name of the public authority to identify datasets and other strategic information holdings. ROSI is located on GovNet at [http://register.govnet.qld.gov.au/rosi/rosi\\$srch.startup](http://register.govnet.qld.gov.au/rosi/rosi$srch.startup).

Also consider whether the work of the public authority has been outsourced under any third party arrangements. It is necessary to identify whether any records created by the third party under contractual arrangements are public records. If so, they should also be included.

When identifying records and recordkeeping systems, also identify:

- What functions and activities they relate to.
- Date range. This is particularly relevant for legacy records.
- The relationship between different recordkeeping systems, both paper and electronic. For example, do clients fill out paper forms that are both entered on a database and placed on a file?

4: Researching retention requirements

4.1 Identifying requirements

Records are usually retained for any one of three reasons:

- Business needs.
- Accountability (including legislative requirements).
- Community expectations.

The main sources for determining retention periods are administrative and legal precedent, legislation, policy and procedure manuals and consultation with staff. In addition, external standards that the public authority complies with, such as the ISO 9000 quality standards or the National Association of Testing Authorities (NATA) may have requirements relating to the retention of records. Retention periods are rarely explicitly spelt out and have to be deduced from the information gathered from all sources.

Tip: Many records are retained in case of future legal action. The *Limitation of Actions Act 1974* (also referred to as the Statute of Limitations) is an important source for retention requirements, setting out different periods within which an action must be commenced depending on the type of claim.

In interviewing staff members, rather than asking 'how long should we keep the record?', ask more specific questions about how they use the record, for example:

- Do you need to refer to the record again after the matter is completed?
- How long after do you refer to it?
- What is commonly the last action in a particular transaction (there may be several scenarios)?
- Are there any appeal process or legal reasons which you might need the record for?
- Do other parts of the organisation use the records (for example, internal auditors)? What for?
- Do other public authorities rely on the records or create similar records? Which authority is the office of record for these records?
- Is there any community interest in the records?

There is an expectation by the community that certain records will be available for a long time in the future, for example, adoption records. While responsible business units may have some information on community interests in the records, QSA can also provide advice on this.

Example: Identifying retention requirements

Legislation may state that a client must appeal a decision within 12 months. Therefore you would need to keep the records documenting the decision and the reason for 12 months after the decision. But if you destroy all records after 12 months, some records being used in current appeal processes would be lost. Therefore the final retention recommendation might be 'Retain for 1 year after last action and until finalisation of appeal'. Alternatively, in consultation with the business unit, you may discover that appeals never last for more than 6 months. For the sake of simplicity you may decide to retain all records for the same length of time allowing for any

appeals. The minimum period would then be 12 months plus 6 months and, allowing a margin for safety, the retention might be 'Retain for 2 years after last action'.

This is only a partial example. You would also need to determine whether, and for how long, the records are referred to after the completion of the action and the relationship with other records. For example if a client appeals, are the original records incorporated into an appeals file?

4.2 *Special format records*

It is important to ensure that all records of the public authority are covered by the Retention and Disposal Schedule, regardless of format. Records often overlooked include:

- Photograph collections.
- Maps and plans.
- Moving images.
- Databases and other corporate systems.
- Online resources and services.

While these formats can present particular challenges to appraise, some common principles apply. Questions to ask include:

- Why were the record/s created?
- What purposes do they serve?
- How do they link to the functions and activities of the public authority?
- Is there any business, legislative or community need to retain the records?

Some special considerations for these different formats are briefly outlined below. Please feel free to seek additional advice from QSA when appraising special format records.

Photograph collections

Photographs are often held as part of a file or other record. These photos should be given the same retention period as the record or transaction to which they belong. Some public authorities also hold collections of photographs that also need to be appraised, whether physical or digital. Particular factors to take into consideration when appraising photographs are:

- Age: photographs are very rare before 1888, with the introduction of amateur photography, and also less common before 1932, with the introduction of the 35mm SLR camera.
- Identification: in general, unidentified and unidentifiable photographs are of little value.¹⁰
- Quality: photographs should be of satisfactory technical quality, in focus with proper exposure.
- Aesthetic value: some may have value as works of art or artefacts.

¹⁰ Identification can in many circumstances be derived from the context and content of the photograph. The absence a caption does not necessarily mean the photo is unidentified or unidentifiable.

- **Formats:** ideally, both the negative (black and white or colour) and a captioned print should be retained for the required retention period. For digital photographs, the resolution and whether lossy or lossless compression has been used should be considered.
- **Quantity:** often photographic collections contain many duplicate or near-duplicate photos. Selection based on quality and the availability of both negative and prints can be used to reduce duplication.¹¹
- **Integrity:** both digital and physical photos can be altered. Knowing if any changes have been made, and what they are, can impact on the evidential value of records.

Maps and plans

Like photographs, maps and plans are often held as part of a file or other record. These should be given the same retention period as the record to which they belong. Like other records, maps and plans were created to serve a business function, often the allocation of land or construction of buildings or other infrastructure. Issues to consider in appraising maps and plans include:

- The historical significance of the geographical area or particular building.
- Their uniqueness as an example of map-making or architectural techniques.
- Their value as works of art or artefacts.
- Their physical quality.
- Their quantity.
- The availability of related documentation, such as field notes or surveys.¹²

Many different plans are prepared in construction projects and it is important to be able to distinguish between the different types of plans, from conceptual to as-built. The advice of business area experts is often very valuable in assessing these types of records.

Moving images

Moving images, originally on film and now more commonly on video, CD or DVD, can serve a number of purposes. The purpose of the moving image is a key factor in its appraisal. Moving images are often produced to:

- Record an activity: for example, videoing a ceremony or construction of a building.
- As a tool in itself: for example, as a health promotion or community education tool.

Moving images may also be received by the public authority, often as part of a grant allocation process or funding submission.

Generally, moving images should be retained for the same period as the related records, taking into account business needs or any long term historical value. In addition, age is also a consideration: pre-1930s film is of relatively more historical interest because it is rare.

Another factor in the appraisal of moving images is any inherent aesthetic, artistic or technological value, for example, whether it is the work of a well-known director. However, the majority of public authorities are unlikely to hold any records in this category.¹³

¹¹ Leary, William H. (1990) 'The archival appraisal of photographs' *Selected Guidelines for the management of records and archives: a RAMP reader*, UNESCO.

¹² Coles, Laura (1998), *Maps, Plans and Architectural Drawings*. Archives Association of British Columbia. Available online at http://aabc.bc.ca/aabc/msa/9_maps_plans.htm .

Databases and other corporate systems¹⁴

Many public authorities are implementing line-of-business systems which, as well as automating aspects of business, replace traditional recordkeeping practices. Like traditional records, databases and other corporate systems should be assessed based on the business functions and activities they document.

The main challenge presented by this format is understanding how the system is structured in order to identify 'the record' or records in the system. For example, is the information associated with a particular client or case number, and can therefore be regarded as analogous to a case file? Does the system have different modules, which could reflect different records?

If the system replaces previous paper processes, an examination of the former records may help in understanding the type and importance of the records in the system. For example, if a new system replaced a client register of permanent value and records of payments from clients of temporary value, it is unlikely that the entire new system would be of permanent value. Two classes could be drafted in the schedule:

- Records comprising data elements relating to client contacts in XYZ system.
This includes (but is not limited to):
 - Client Name
 - Address (etc.)
- Records relating to payments made by clients in accordance with s.X of ABC Act.
This includes (but is not limited to):
 - Invoices
 - Entries in the XYZ system.

Depending on whether there are related records in other formats, the classes may or may not be limited to the records of a particular system.

Online resources and services

Like databases and other corporate systems, one of the challenges of appraising records of websites and other online resources and services is determining what 'the record' is. There are generally three types of records relating to the online environment:

- Records of the information and services posted on a website (eg. approval to publish to the web).
- Transactional records of services and other transactions conducted online (for example, paying a fine, purchasing a product, renewing a licence).
- Administrative records of online resources, including design and maintenance.
- Copies of records, the master of which is captured in the corporate recordkeeping system.
- Unique information not captured in another record.

¹³ For those organisations with extensive video and film collections, the following article provides a more detailed overview of the issues to consider when appraising moving images: Sam Kula (1990) 'The archival appraisal of moving images' *Selected Guidelines for the management of records and archives: a RAMP reader*, UNESCO. Available online at http://portal.unesco.org/ci/en/ev.php-URL_ID=21989&URL_DO=DO_TOPIC&URL_SECTION=201.html

¹⁴ This section does not cover electronic document and records management systems (eDRMS) as their functionality is equivalent to traditional paper files.

The first two categories of records should be appraised in conjunction with similar records. For example, consider whether information posted on a website is also published in traditional forms, or how long records of the same over-the-counter transactions are being retained. Again, a challenge is then determining how to capture and manage the record for the required time, particularly if information presented to clients is generated 'on the fly' from dynamic databases. More information on this is available in QSA's *Managing Records of Online Resources and Services* policy and accompanying Guidelines.

Administrative records of online activity are common to most public authorities and do not need to be included in a public authority-specific schedule as they are covered by the GRDS.

4.3 Relating retention requirements to functions and activities

While functions and activities provide the framework of a Retention and Disposal Schedule, an understanding of how records are organised is also important. In the analysis process, different activities may have been identified but in practice they all appear on a single file. A decision will need to be made on whether to replace the identified activities with a single term. For example, identified activities of applications, renewals and notifications, which all appear on a single file, can be indicated by a term such as licensing or cases.

It is equally important to not link the schedule so tightly to current recordkeeping practices that it becomes redundant as soon as practices change. This is particularly important to bear in mind when the schedule is being developed as part of the implementation of a new recordkeeping system or other change to recordkeeping practices.

Classes under a particular function and activity combination should be comprehensive. Everything included in the scope of an activity should be reflected in either a record class underneath it or by a cross reference to another class. For example, if the scope note refers to providing an enquiry service, ensure that records of unique, agency specific enquires are included in a class description or in a reference to an appropriate GRDS record class.

Including GRDS activities

As noted in section 3.4, GRDS **functions** should only be included in the public authority's schedule if it can be clearly demonstrated that the public authority has a specific role in respect to that function. However, some **activities**, such as policy, procedures, tendering, contracting out, etc, occur under both a public authority's specific functions and general administrative ones. When researching retention periods, also investigate whether the GRDS provides adequate coverage for the records generated under the combination of specific function and common activity or whether the agency can justify a variation.

QSA generally recommends using GRDS coverage where appropriate, as having many disposal classes for similar records in different places may allow inconsistencies to occur. However, in some circumstances the public authority may prefer to include coverage in their core business Retention and Disposal Schedule even if retention periods are the same, for example to:

- Provide clear and explicit coverage for key organisational records, such as records required to be created under legislation. For example, energy authorities are required to submit an annual electricity generation return to the Office of Renewable Energy Regulator in accordance with s.20 *Renewable Energy (Electricity) Act 2000*.

This may be included under the common activity of reporting in a public authority-specific schedule rather than as a generic report in the GRDS.

- Where there are clearly distinct and unique records existing under the common activity. For example, when a key part of the function is managing contracts with third party service providers the common activities of contracting out and tendering may be included in the public authority-specific schedule.
- When file titling and disposal coverage is closely linked to a business classification scheme and it is known that records will be created under the combination of the specific business function and common activity.

Tip: Where GRDS functions or activities are included, record classes should be clearly unique to the public authority and not generic repetitions of record classes already included in the common administrative Retention and Disposal Schedule.

4.4 Case files

Case files, whether relating to grants, licences, investigations, child safety, correctional centre inmates, patient files or many other activities, are often key records of a public authority in terms of their importance and size. They may be in traditional paper format, kept in databases or a combined approach.

The retention period should be primarily based on business need – how long after the case is closed does the public authority need to refer to it? How long does the case remain current? As case files often contain information on people's rights and entitlements, the period allowed for any future claim or litigation according to the *Limitation of Actions Act 1974* or other relevant legislation should also be taken into account.

Apart from business and legislative needs, case records can also be of historical interest as they record the implementation of government policy and can demonstrate its impact on citizens. Despite this, the large bulk of case records, either in terms of physical size or electronic storage demands, mean that series of case files are rarely retained in their entirety, except if they document ongoing rights and entitlements of individuals.

Selective sampling – major/minor

Sampling methods are often used to select parts of the series to retain.¹⁵ Before deciding to retain any case files, it is important to determine whether sufficient information is retained elsewhere: for example, project files also document implementation, unique cases are routinely included in the Annual Report of the public authority or summary cases information may be maintained separately to the full details. It must also be determined that the case records do have archival value: that they document an important or influential project, program or business activity.

Selective sampling involves choosing those examples that are special or unique in some way, that document a significant decision or issue for otherwise identical processes or activities. It is often reflected in disposal schedules using terms such as 'major' or 'significant', contrasted with classes for 'minor' or 'other' records relating to the same activity. When using major / minor distinctions it is important to include in the 'description of records' in the disposal schedule clarification on what is meant by these distinctions. For example it might be qualified by the cost involved in a contract, whether a building is listed on the heritage register or not or whether research resulted in a new patent or invention.

¹⁵ For more information on the appraisal of case files and different sampling approaches, see Cook, Terry. (1991) *The archival appraisal of records containing personal information: A RAMP study with guidelines*, UNESCO. Available online at <http://www.unesco.org/webworld/ramp/html/r9103e/r9103e00.htm> .

Tip: It may be helpful to look closely at examples of files to identify why some are more complex, more interesting or more valuable than others. In many situations, a visual check for 'fat' or thicker than average files may help pinpoint examples worth close investigation.

4.5 Privacy and security

Many records contain information on individuals which give rise to privacy concerns. While privacy is an important concern, it is not a reason in itself to destroy a record early. Some records that are very sensitive from a privacy perspective, such as personnel, adoption or worker's compensation files, also require long retention periods to protect an individual's rights and entitlements.

The *Information Privacy Act 2009* recognises the role of the *Public Records Act 2002* in governing the retention and disposal of public information. Privacy of personal information should be ensured by implementing access controls on records while they are retained.

Similarly, records may also document important or confidential information that needs to be maintained securely and therefore have a security classification applied. However, like privacy, the security classification of records generally does not affect their retention period.

It should also be noted that sensitivities in records usually decline with age. For example, some security classified records may only be confidential until a commercial agreement is signed. Privacy and security of personal or confidential information in records with permanent retention can be ensured by setting an appropriate restricted access period for the records.¹⁶

4.6 Disposal triggers

In addition to the actual time period given for retention, a 'disposal trigger' must be included, that is, the event from which the disposal period must be calculated. The most common trigger is 'after last action'. This means the date the last document or other noting is attached to the file, or the last update is made to the record in the database.¹⁷

Tip: Ephemeral records are those records of such minor value they are not usually registered, filed or otherwise managed as a record. They can be disposed of without official authorisation. Examples of ephemeral records include minor drafts that were not circulated for comment or approval, phone slips and duplicate copies of reports or other documents. These types of records should not be included in a Retention and Disposal Schedule as they are covered by the *GRDS*.

The selection of the disposal trigger depends on the type of record being covered and the reason for retention. Other common triggers include (x years) '...after superseded', '...after expiry of agreement', '...after date of birth'. Particular care should be taken when assigning retention periods for records relating to minors because the time periods available for legal action under the *Limitations of Actions Act 1974* do not commence until

¹⁶ For further information on setting restricted access periods, see "How to set restricted access periods for public records" available from QSA's website at <http://www.archives.qld.gov.au/Government/restrictedaccess.asp>.

¹⁷ Disposal procedures should provide mechanisms for checking whether there is any unforeseen, ongoing need for a record before implementing disposal actions. Destruction of records should never be automatic at the expiry of a retention period. For further information on sentencing and disposing of records, see QSA's *Guideline for the Implementation of Retention and Disposal Schedules* (2007) available at <http://www.archives.qld.gov.au/Government/appraisal.asp>

the child reaches eighteen (18) years of age. Further examples of disposal triggers can be located in schedules previously approved by QSA which are available online at <http://www.archives.qld.gov.au/Government/disposal.asp>

When setting retention periods and triggers, also consider how practical implementation will be. Will each file need to be examined to determine the date of birth? How will we know when the agreement has expired? For more information on implementing the schedule, see QSA's *Guideline for the Implementation of Retention and Disposal Schedules* (2007) which is available online at <http://www.archives.qld.gov.au/government/appraisal.asp#guideline>

'Permanent' means that the record cannot be destroyed and will form part of the archival resources of the State of Queensland. There is an expectation that all permanent records (except those required to be retained permanently at the agency) will be transferred to the custody of QSA in due course and made available to the public for research purposes.¹⁸

¹⁸ Transfer is not automatic and will be negotiated between the public authority and QSA, usually when the records are no longer required for current business use and closer to the point when they will be available for public access. Further information on transfers is available from QSA's *Disposal and Transfer of Public Records Guidelines* available at <http://www.archives.qld.gov.au/downloads/GuideTransferDisposalPublicRecords.pdf>

5: Preparing the Schedule and supporting documentation

5.1 Templates

These Guidelines contain one optional and two compulsory templates for use by public authorities when submitting requests for disposal authorisation to QSA. Appendix C: *Background Research Template* (compulsory), captures information on the administrative and legal context of the organisation and records collections and systems, as researched in 3.3 and 3.5 above.

Appendix D: *Legislative Mapping Template* (optional) documents the sections of the relevant Act/s, the section description, any recordkeeping requirements and where these recordkeeping requirements are covered in the Retention and Disposal Schedule, as described in 3.2 above.

Appendix E: *Draft Retention and Disposal Authority Template* (compulsory) contains space for documenting the functions and activities of the organisation, records classes, recommended retention periods and the rationale for these. It contains separate sections for current records and legacy records.

5.2 Documenting background information

The *Background Research Template* has a straightforward question and answer format to capture information on the legislative and administrative context of the public authority and information on existing records holdings and recordkeeping systems.

Information gathered in sections 3.3 and 3.5 above should be documented in this template. It provides context to help QSA assess the recommended retention periods in the draft Retention and Disposal Schedule. This document is completed once for the whole schedule – different versions are not required for each class or grouping within the schedule.

The relevance of questions in the template and therefore the level of detail of responses may differ depending on the scope of the project. For example, if legacy records are excluded a detailed history of the public authority is not required and a brief summary will be sufficient.

5.3 Preparing the draft Retention and Disposal Schedule

The *Draft Retention and Disposal Schedule* template has four sections. Advice on completing each section is outlined below.

Introduction

This section outlines the legal status of the schedule under the *Public Records Act 2002*, contains the authorisation, the identifying QDAN (Queensland Disposal Authority Number) and conditions on the use of the authority.

Public authorities should complete the highlighted fields relating to scope of the schedule, revocation of existing QDANs (in consultation with QSA) and, if the schedule is a revision rather than a new schedule, a summary of changes.

Table of Contents

The table of contents lists all of the public authority's functions, and the associated activities, with a page number for easy reference.

Current records

The main body of the schedule contains the disposal classes relating to the current functions and activities of the public authority.

Tip: Write the Retention and Disposal Schedule as though the reader knows nothing about the business of the public authority.

Table 2 provides advice on completing the various components of this section.

Legacy records

The public authority may hold collections of older records that do not relate to their current functions and activities. For example, records may have been created under legislation that has been repealed.¹⁹ Attachment 1 of the QDAN template provides space to cover these records. These may be covered by previously approved QDANs or disposal authorities.

Depending on the type of records to be covered, this attachment may be structured according to a previous classification scheme, for example, subject headings, or be a simple list of relevant records.

The general principles for descriptions of records outlined above apply in this context. However, due to the lack of context given by functions and activities, the description may have to be more detailed. Alternatively, if it is a simple, easily identifiable group of records, a concise description may be sufficient.

For example:

- Records relating to the registration of printing press proprietors and newspapers under the repealed *Printers and Newspapers Amendment Act 1971*.

Or

- Records recording court depositions in civil and criminal trials. Includes Deposition Books.

The template also contains a column for date range. This acknowledges that records change over time, not only in format but in the type of information collected in them. For example, the 'selective method' of selecting land commenced in 1962 and was repealed in 1990. By including a date range, it can help distinguish selective method registers from other, similar land registers. If the date range cannot be determined with any certainty, approximate dates, indicated by 'c.' or 'circa', should be included.

Due to their relative scarcity, please seek advice from QSA before recommending retention periods for pre-1950 records.

As for current records, it is necessary to include the justification for every retention period.

¹⁹ If older records do document current functions and activities, but were arranged in a different way, for example, under a previous subject classification scheme, they should not be included as legacy records. The retention periods in the main body of the disposal schedule will apply.

Function	Enter the function term and scope note, with legislative references where appropriate. Functions in the schedule should be consecutively numbered and may include references to relevant GRDS activities.
Reference number	A three-part numbering system is used in disposal schedules reflecting the number of the function, the activity and the class.
Activity	Enter activity term and scope note, with legislative references where appropriate. Use the 'merge cells' option if necessary so that there are only two cells in the activity row: the number and the activity term and note. References to relevant GRDS records classes may be included.
Description	<p>Enter a concise description of the transactions and records to be covered by the particular disposal action. The description should include some detail on the information documented in the records, examples of specific records and reference to relevant legislation if it will assist in identifying the records. For example:</p> <ol style="list-style-type: none"> 'Annual electricity generation return documenting: <ul style="list-style-type: none"> total amount of electricity generated, total amount of electricity generated using eligible renewable energy sources, and number of renewable energy certificates created, submitted to the Office of Renewable Energy Regulator in accordance with s.20 Renewable Energy (Electricity) Act 2000 (Commonwealth).' 'Records relating to fee exemptions granted under s.15 of the <i>Fee Exemption Act 2000</i>. This includes (but is not limited to): <ul style="list-style-type: none"> applications, student / corporate client fee variation calculation records, supporting documentation, and correspondence from Director.' 'Records relating to the accreditation of the agency as a public testing service provider with the National Association of Testing Authorities (NATA).' <p>Vague or generic descriptions, for example, 'records relating to x activity under y function' are not acceptable as they do not include sufficient information. Record classes that repeat the activity scope note are also unacceptable.</p> <p>References to other relevant record classes in the core business schedule or the GRDS may be included.</p>
Status	Indicate whether the records are temporary or permanent.
Disposal action	Enter the recommended disposal action, including retention period and trigger. Standard format is "Retain for [retention period] after [disposal trigger]". ²⁰ For permanent records, enter "Retain permanently".
Justification	<p>Enter a brief but specific reason for the retention period, eg</p> <ul style="list-style-type: none"> 'high risk for litigation. Keep in accordance with Limitation of Actions Act s. X' (simply stating <i>Limitations of Actions Act</i> is insufficient). 'agreements renewed every 2 years, only refer to previous 2 agreements. Confirmed by Manager D'. 'information in these records is entered into client management system - see class x.y.z [that covers the system record] - so these are of transitory value only'. <p>Only legislation directly related to the retention period should be listed here.</p> <p>Justifications may be a combination of legislation, business requirements (listed) or community expectation, etc. Terms such as 'business need', 'research value' or 'similar to GRDS' are not acceptable without further explanation. Also, provide web-hyperlinks for relevant justification sources (eg. reports) which are available online.</p> <p>QSA will use this information to review and approve retention periods. The provision of insufficient justification information will lead to delays in the approval process.</p> <p>PLEASE NOTE: The justification column will not appear in the approved version of the schedule.</p>

Table 2: Completing the QDAN template

²⁰ Examples of different disposal actions are available in previously approved schedules at <http://www.archives.qld.gov.au/Government/disposal.asp>.

Digitised or Microfilmed Records

Public authorities may apply to QSA for permission to dispose of temporary, original records which have been digitised or microfilmed, earlier than the authorised retention period. Any approval is subject to strict conditions and must be undertaken separately to the approval process required for the Retention and Disposal Schedule.

Where approval is granted for early disposal, the digitised/microfilmed copy must be retained for the same length of time as the paper original would have been required to be kept.

No global or general authorisation will be given for the disposal of original records after digitisation/microfilming. For public authorities with a core business Retention and Disposal Schedule, authorisations will be given through amendments to this schedule. Authorisations for GRDS record classes, will be given through the addition of an appendix to the public authority's Retention and Disposal Schedule. Public authorities covered by sector-specific Retention and Disposal Schedules, will be issued with an agency-specific Retention and Disposal Schedule indicating which record classes in the sector schedule or GRDS may be disposed of after digitising/microfilming.

Tip: It is unlawful to dispose of original records which have been digitised or microfilmed without prior written authorisation from the State Archivist.

For further information on applying for permission to dispose of original records after digitisation or microfilming, please refer to the following QSA' publications:

- *Digitisation Disposal Policy* available at <http://www.archives.qld.gov.au/government/ddp.asp>
- *Microfilm Disposal Policy* available at http://www.archives.qld.gov.au/downloads/Policy-microfilm_final.pdf

Index

The subject index aids users in searching for specific terms which may not be immediately apparent under the function and activity structure used in the schedule. The index may contain references to specific legislation mentioned in the schedule and refer to relevant GRDS reference numbers if desired.

It is the public authority's responsibility to develop this. This may be done at a point when the schedule is nearing a "final draft".

5.4 Before submission

Consultation

The draft schedule should be distributed to key stakeholders in the public authority, such as business managers, audit, legal and Right to Information staff, before submission to QSA to ensure it meets their requirements. In this process, they should also be made aware that consultation with QSA may result in further changes.

Test the schedule

The draft disposal schedule should be tested against samples of existing records to ensure disposal classes are clear and meaningful. This testing should be done by staff who were not involved in the development of the schedule. The testing may reveal omissions or areas requiring further clarification.

Regional offices should also be included in the testing process to ensure that the schedule can be applied to all records of the public authority.

6: The approval process

6.1 Introduction

The approval of any Retention and Disposal Schedule is not automatic.

QSA requires public authorities to submit a complete draft of the schedule (together with supporting documentation) for preliminary review before formal submission. After QSA's appraisal archivists and the public authority have agreed on any changes to the draft, the draft should be endorsed by the public authority's CEO for formal submission to the State Archivist for approval.

6.2 Preliminary review

The review is usually undertaken by the same appraisal archivist who was assigned at the beginning of the project. The appraisal archivist will initially check that all required work is complete, for example, that clear and meaningful justifications are included for every class in the schedule and that background information is provided.

Following this initial check, the appraisal archivist will assess the draft Retention and Disposal Schedule to ensure:

- That the schedule is comprehensive.
- That retention periods are appropriate, based on adequate research and justified.
- That all relevant legislative requirements have been identified.
- That classes are clear and do not overlap with other classes in the schedule or in the GRDS.

The appraisal archivist may also liaise with the State Archivist on certain record classes.

The review is an iterative process, with extensive consultation between the public authority and QSA. The time taken for the preliminary review will depend on the length and complexity of the schedule, the quality of the work submitted, the number of major schedules already under review by QSA and the timeliness of responses by the public authority to issues raised.

Where a consultant was engaged to develop the disposal schedule, the public authority should ensure that the consultant is available (either in person or by telephone or email) for the duration of the review. This is to ensure that access to research material and detailed knowledge of the disposal schedule is readily accessible by QSA, as required. In the absence of the contract consultant, a public authority contact officer should be able to provide this information.

What sort of questions will be asked during the preliminary review?

While it is difficult to provide a detailed list of the questions that are asked during this process, as they depend on the contents of the schedule presented, areas of inquiry commonly include:

- More information on the background or history of the functions and activities documented in the schedule.
- Relationship between the functions and activities documented in the schedule.
- Relationship between the public authority and others (whether similar records are duplicated across more than one public authority).
- Clarification on the record types covered by the schedule.

- Clarification of the reasons for the retention or destruction of particular records classes.
- Whether records have particular information in them.
- Whether relevant legislation has been identified.
- The relationship, if any, between similar classes of records. (For example, if records that are being destroyed are summarised elsewhere.)
- Suggesting changes to retention periods based on experience with previous disposal decisions and knowledge of related records in the QSA's collection.
- Attempt to clarify any relationship between the records in the schedule and other records already in QSA's collection.
- Establish if the records will have longer-term interest to the Queensland community.²¹

6.3 Formal approval

After the preliminary review process is completed, with both the appraisal archivist and public authority agreeing on the schedule, it should be endorsed by the CEO of the public authority and submitted to the State Archivist for approval. Appendix B provides a sample submission letter which may be used or adapted by public authorities.

The State Archivist will conduct the final review of the schedule and formally approve the document.

While QSA attempts to resolve all issues in the preliminary review stage, it is possible that further questions may emerge during this formal approval process.

When approved, the schedule will be signed by the State Archivist, allocated a Queensland Disposal Authority Number (QDAN) and issued to the public authority. A copy of the Retention and Disposal Schedule will also be displayed on QSA's website, if authority for such publication is approved by the CEO of the public authority.

6.4 Appeals

Under s.39 of the *Public Records Act 2002*, a public authority may request the Public Records Review Committee to review a decision made by the State Archivist not to authorise the disposal of particular public records or classes of public records.

Any application for review must be made in writing, within 14 days of the public authority being notified of the State Archivist's decision. Prior to lodging an application for review, the public authority must be able to demonstrate reasonable attempts to reach an administrative resolution via a formal communication process with the State Archivist. More information on the review process is available from QSA on request.

Public authorities are encouraged to work closely with QSA during the development of the schedule to ensure any issues can be dealt with as they arise. If this process is followed, serious disputes are unlikely.

²¹ Based on questions in State Records of South Australia (2004) *Recordkeeping Advice 18: The State Records Internal Disposal Meeting*. Available online: http://www.archives.sa.gov.au/files/management_disposal_RDS_SRmeeting.pdf.

7: Implementation, maintenance and review

7.1 Implementing a Retention and Disposal Schedule

Once a new Retention and Disposal Schedule is approved, all affected staff must be advised and reference copies of the repealed schedule/s must be removed so they are not used in error. A copy of each previous schedule must be retained in the public authority's recordkeeping system so earlier disposal decisions can be checked and validated if necessary.

Detailed advice on sentencing and disposal can be found in QSA's *Guideline for the Implementation of Retention and Disposal Schedules* which is available at <http://www.archives.qld.gov.au/Government/appraisal.asp>.

7.2 Maintaining a Retention and Disposal Schedule

Public authorities, the work they do and the environment they work in, are not static and neither is a Retention and Disposal Schedule.

A public authority is responsible for regularly reviewing its core business Retention and Disposal Schedule to ensure that the schedule remains aligned with business, legislative, regulatory, administrative and cultural needs. Strategies should be put in place to monitor any changes to the public authority's legislation, policies and business needs and these should be investigated for potential impacts on the retention requirements in the schedule.

Changes to the Retention and Disposal Schedule must be submitted to QSA for approval.

7.3 Reviewing a Retention and Disposal Schedule

In addition to ongoing maintenance, Retention and Disposal Schedules should have a thorough review on a regular basis. Every five years is recommended, otherwise sooner if one of the following occurs first:

- Machinery of Government (MoG) change.
- A function or several functions change.
- There is a legislative change affecting the powers or responsibilities of the public authority (for example, a requirement to make or keep certain records changes).
- New legislation is enacted or current legislation repealed.
- Recordkeeping system changes (for example, from a paper-based to an electronic system, system of arrangement and control changes).
- Plans are made to commercialise or privatise the public authority.

As with the development of a schedule, please notify QSA when planning a review.

The review should involve a re-analysis of the organisational and recordkeeping context for any changes that may have occurred over the review period. If a schedule is reviewed frequently, the extent of research required may not be as detailed as in the development phase of the disposal schedule.

However, if the review has been initiated as a result of a MoG change or as a result of inheriting functions from another public authority, a detailed analysis of the scope, history, regulatory context and records will be required for those new functions. Consultation should again be undertaken as part of this process.

Regardless of the reason for the review, any changes and supporting research should be documented in new versions of background research and Retention and Disposal Schedule templates. A summary of changes should also be prepared, highlighting differences between the original and new version.

The new version of the disposal schedule and associated documentation will need to be submitted to QSA for review and approval as outlined in section 6 of this Guideline.

Appendix A: Sample interview questions

It is important to be thoroughly prepared for an interview or focus group. As outlined in the Guidelines, there are different types of information that needs to be collected in order to develop a Retention and Disposal Schedule. Examples of questions are arranged below to highlight the type of information they are designed to elicit.²² In practice, it may be more beneficial to order the questions to follow a work process through from legislative context to activities to documenting it and using the records, and then asking about the next process, rather than as arranged in this guide.

Many of the questions are seeking similar information. Asking in different ways can help elicit fuller information and more detail, and can also provide a cross-check.

Please note that this appendix indicates potential lines of questioning rather than an interview script. The actual questions asked should reflect research already done, and seek confirmation of, or further information on, facts already discovered. For example, instead of asking 'do you administer any legislation?' it may be better to seek confirmation on the relevance of legislation already identified, ask if there are any more and discuss how much of an impact the legislation has on a day-to-day basis.

Before the interview commences, explain the purpose and benefits of the project, and its expected timeline.

Question	Rationale
Public authority context	
What are the reporting lines within the authority and to external authorities?	Mapping reporting lines can help identify boundaries of business functions. Formal reports can provide consolidated forms of information which may be more valuable over the longer term than detailed records.
Does the public authority / business unit consider itself to be in a highly regulated environment?	Regulation may have impact of the types of records created and how long they need to be kept.
Who are the stakeholders?	Consider whether stakeholder's interests will impact on how long records need to be kept.
Is the business of other organisations reliant on the activities of the public authority? If so, describe how.	With cross-organisational activity, information may be duplicated in records of other public authorities. May impact on need to retain records.
What legislation do you administer?	Legislation is useful to identify functions, activities, processes and occasionally implicit retention requirements.
Business functions and activities	
For what functions and activities is your area responsible?	Identify functions and activities to structure schedule.

²² These questions are focused on information required for developing a Retention and Disposal Schedule and are a revised extract from the questions in 'Appendix 2: Interview Questions' in the National Archives of Australia's DIRKS manual.

What specific processes do you follow when performing these activities?	Processes create records – identify records that need to be covered by schedule.
What compliance or accountability measures are in place?	May identify compliance records related to process May identify stakeholders with interests in records
Is the work governed by any standards?	Standards may provide supporting information about process and implicit retention requirements
Do you interact with other business areas when performing your activities?	Identify other areas with interest in records. Information may be duplicated in different records or systems.
Records and recordkeeping systems²³	
What sort of information do you capture when doing [business process / activity]?	These questions are aimed at identifying the type and location of records and relating these to relevant business processes and activities. Knowing where records are located and how they are managed is vital to implementing the schedule.
What paper or electronic systems do you use to document this?	
Do you find these systems to be adequate?	
What records do you create? Why?	
Where are these records located?	
How are the records managed?	
Retention periods	
What records or information do you refer to when working?	These questions are aimed at identifying the different factors that affect the retention of a record: <ul style="list-style-type: none">• immediate business need,• reference use by the same business area,• use by other areas, and• use for any compliance, audit or regulatory purpose.
How old is this information? How far back do you look?	
When creating records on a particular matter, do you refer to it again once the matter is completed? For how long?	
Are your business area's records referenced and used by other areas of the organisation? If so, why?	
Are you aware of any legislative provision affecting how long the record has to be kept?	
Is there any appeal or audit processes that affects how long the record should be kept?	

Table 4: Sample Interview Questions

²³ These questions are targeted at business managers rather than records managers. The DIRKS interview guide mentioned above contains questions focused at the records manager, which will be of use if the project is being completed by someone with little knowledge of the public authority's records and recordkeeping systems.

Appendix B: Sample submission letter

The following sample letter has been prepared as a template which may be used as the basis for the Chief Executive Officer's formal letter submitting the Retention and Disposal Schedule to the State Archivist for approval.

As described in section 6.3, formal submission of a schedule occurs after the public authority and Queensland State Archives have completed the preliminary review process.

Ms Janet Prowse
Director & State Archivist
Queensland State Archives
PO Box 1397
SUNNYBANK HILLS QLD 4109

Dear Ms Prowse

I have reviewed the attached draft *[name of public authority] Retention and Disposal Schedule* and am satisfied that the Schedule meets *[name of public authority]*'s legal, business and accountability needs for the records covered by the Schedule.

I submit the draft Schedule for your approval in accordance with s.13 of the *Public Records Act 2002*.

I also grant permission for Queensland State Archives to place a copy of the approved Schedule on Queensland State Archives' website.

Appendix C: Background research template

Appendix D: Legislative mapping template

Appendix E: Retention and Disposal Schedule template

These templates are available for download from QSA's website as separate word documents for completion by public authorities.