Records Disposal Toolkit

Information and resources for staff on disposal of University records

Records Services
University Secretary’s Department
Division of the Senior Vice-Principal
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1. Introduction

All University staff share a responsibility for records management. Each business unit is encouraged to integrate a regular records disposal program into their routine operations to ensure that records are disposed of appropriately and in a timely manner. Occasionally, additional ad-hoc records disposal activities may be required, e.g. when a business unit closes or unmanaged records are discovered.

1.1. Scope

This toolkit is intended for University staff, particularly those who have never done disposal activities before.

The purpose of the toolkit is to inform staff of their record keeping obligations and provide guidelines and procedures to assist with records disposal.

This toolkit is not designed to assist with the implementation of an ongoing disposal program. For more information on how to implement an ongoing disposal program in your business unit, contact Records Services.

1.2. The records management context

Legislative requirements govern how we access, capture, control, dispose of, store and otherwise manage our business records.

The University (including its subsidiaries) is considered a public agency in Victoria and is therefore subject to the Public Records Act 1973 (Vic). University staff are considered public officers under this act.

This legislation is supplemented by the following University policies and procedures relating to records management:

- Records Management Policy
- Access to Staff Email and Digital Storage Policy
- Records Access Procedure
- Records Management Procedure
- Records Retention and Disposal Procedure

1.3. Feedback

We welcome feedback on this toolkit and how it can be improved to suit the needs of University staff. Please send any suggestions to Records Services via email to records-services@unimelb.edu.au.
2. Records management overview

Records disposal is one component of the broader records management process. This section of the toolkit provides a brief overview of records management, including key terms and concepts.

2.1. What are records?

The Public Records Act 1973 (Vic) defines a public record as ‘anything made or received by a public officer in the course of doing their duties’. In the university context, a record is anything made or received by a University staff member in the course of performing their duties.

If you are unsure whether something is a University record, ask yourself the following questions:

- Does it relate to work?
- Did I write it?
- Do I need to action this?
- Is this external correspondence (in or out)?
- Does this support or document a business transaction?
- Has the record been used to create other records?
- Is the record I hold the original record?

If you answer yes to any of these questions, it is a University record that must be kept and managed in accordance with University and legislative requirements.

Digital records

Digital records are records that exist on an electronic medium, e.g. email, PDF documents, PowerPoint presentations. All records must be managed in the same way, regardless of format.

Legacy records

Legacy records are records that have been inherited from previous units (departments/schools/faculties/divisions) due to amalgamation, restructure or changes in function. The unit that inherits the legacy records is responsible for managing them appropriately and, where possible, recording their provenance.

2.2. Records management concepts

The following table outlines key concepts in records management:

<table>
<thead>
<tr>
<th>Concept</th>
<th>Further information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create and capture</td>
<td>Records must be:</td>
</tr>
<tr>
<td></td>
<td>• created</td>
</tr>
<tr>
<td></td>
<td>• a record of the decisions made</td>
</tr>
<tr>
<td></td>
<td>• full and accurate</td>
</tr>
<tr>
<td>Control</td>
<td>Records must be:</td>
</tr>
<tr>
<td></td>
<td>• organised</td>
</tr>
<tr>
<td></td>
<td>• contextualised</td>
</tr>
<tr>
<td>Access</td>
<td>Records must be:</td>
</tr>
<tr>
<td></td>
<td>• available to others</td>
</tr>
<tr>
<td></td>
<td>• discoverable</td>
</tr>
<tr>
<td>Concept</td>
<td>Further information</td>
</tr>
<tr>
<td>----------------------</td>
<td>--------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Storage</td>
<td>Records must be:&lt;br&gt;• stored in ways that stop them deteriorating or from being lost&lt;br&gt;• kept securely</td>
</tr>
<tr>
<td>Disposal</td>
<td>Records must be:&lt;br&gt;• kept as long as they are needed for any reason&lt;br&gt;• only destroyed with authorisation&lt;br&gt;• destroyed securely and the destruction documented</td>
</tr>
<tr>
<td>Procedures and systems</td>
<td>Records must be:&lt;br&gt;• held in systems that are able to manage them properly</td>
</tr>
</tbody>
</table>

2.3. Records disposal overview

It is a common misconception that disposal only means destruction. Records disposal is the process of implementing records retention, destruction or transfer decisions documented in a retention and disposal authority or schedule, such as the University of Melbourne Records Retention and Disposal Authority. The following flowchart outlines activities that make up the disposal process for hardcopy records. Each of these activities is described in more detail in this toolkit.
Figure 1: Records disposal flowchart (hardcopy records)

1. **START**
2. Identify records
3. Determine retention period for records
4. Permanent or temporary?
   - **TEMPORARY**
     - Time-expired?
       - **NO**
         - Store securely until time-expired
       - **YES**
         - Complete destruction list
         - Obtain destruction certificate
         - Organise secure destruction
   - **PERMANENT**
     - Has business use concluded?
       - **NO**
         - Retain in business area until business use concludes
       - **YES**
         - Contact Records Services for transfer information
         - Complete transfer list
         - Transfer to Records Services
3. Getting started

This section of the toolkit covers the first steps in records disposal:

- identifying the records
- determining the retention period for the records

It also explains how to use the University’s Records Retention and Disposal Authority and provides advice on appraisal of digital records.

3.1. Identifying the records

You need to identify your records before you can make any decisions about how to manage them. This means establishing the following:

- the type of records
- where the records are stored
- how many records there are
- any other relevant information

Records Services provide a Records Survey that will assist you in documenting this information.

3.2. Determining the retention period for the records

Once you have identified the records, the next step is to determine the retention period for each record. The retention period is the length of time for which a record must be kept before it is disposed of. It is determined using a retention and disposal authority or schedule.

Records Services provide a Records Retention and Disposal Authority (RDA) for University staff. The information in this document is based on legal requirements set by the Public Record Office Victoria. Using the information about the records and the RDA, you can determine the retention period for each record through a process known as appraisal and sentencing, and determine which retention type shown in the table below is applicable:

<table>
<thead>
<tr>
<th>Retention Type</th>
<th>Action Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Temporary record – time-expired</td>
<td>Destroy</td>
</tr>
<tr>
<td>Temporary record – not time-expired</td>
<td>Intermediate storage until time-expired</td>
</tr>
<tr>
<td>Permanent record – still required for business use</td>
<td>Retain in business unit until business use concludes</td>
</tr>
<tr>
<td>Permanent record – not required for business use</td>
<td>Transfer to Records Services for permanent retention</td>
</tr>
</tbody>
</table>

Further information about the action required for each retention type is provided later in this toolkit.

Normal administrative practice (NAP)

Records of ephemeral value (i.e. records with little or no ongoing administrative, fiscal, legal, evidential or historical value) can be destroyed without authorisation as part of normal administrative practice (NAP). You may find that it is easier to first identify records which can be disposed of under NAP, before you undertake appraisal of other records.
The following material may be destroyed under NAP:

- working papers consisting of rough notes and calculations used solely to assist in the preparation of other records such as correspondence, reports and statistical tabulations
- drafts not intended for retention as part of the business unit’s records, the content of which has been reproduced and incorporated into the business unit’s record keeping system
- extra copies of documents and published material preserved solely for reference

You can use the Normal Administrative Practice (NAP) Workflow (Appendix 1) to determine if a record can be destroyed under NAP.

### 3.3. Using the Records Retention and Disposal Authority

The Records Retention and Disposal Authority (RDA) uses a three-tier classification structure to group records of similar type:

<table>
<thead>
<tr>
<th>Tier</th>
<th>Classification Element</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Function</td>
<td>A broad description of the area of work that the record relates to, e.g. academic programs, personnel management, external relations. There are 14 unique functions in the RDA.</td>
</tr>
<tr>
<td>2</td>
<td>Activity</td>
<td>A broad description of the activity within the function that the record relates to, e.g. committees, procedures, incidents. Each function has several subordinate activities. Some activities are repeated over different functions (e.g. procedures, committees), but most are unique to the function they sit under.</td>
</tr>
<tr>
<td>3</td>
<td>Disposal Class</td>
<td>Includes a specific description of the type of record based on the function and activity, and outlines the applicable retention period. Each disposal class has a unique numeric code with three parts (e.g. 0050/2000/2) that identifies the function, activity and class respectively.</td>
</tr>
</tbody>
</table>

To determine the retention period for a record, you need to determine the appropriate function, activity and disposal class(es) that apply to it through a process known as classification.

The RDA outlines a specific retention period for each disposal class. Where more than one disposal class is applicable to a record and the retention period for the disposal classes is different, the longest retention period is applied to the record.

If you think that none of the disposal classes in the RDA apply to your records you should contact Records Services for advice. It is illegal to destroy records on this basis.

#### Examples

The table below provides some examples of records and the function and activity in which they would be classified:

<table>
<thead>
<tr>
<th>No.</th>
<th>Record</th>
<th>Function</th>
<th>Activity</th>
</tr>
</thead>
</table>

...
### Applying retention periods

<table>
<thead>
<tr>
<th>1</th>
<th>Academic Board agendas and minutes</th>
<th>Academic Programs</th>
<th>Committees</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Position descriptions</td>
<td>Personnel Management</td>
<td>Position Classification</td>
</tr>
<tr>
<td>3</td>
<td>Correspondence about a project being undertaken with a local community group</td>
<td>External Relations</td>
<td>Joint Ventures and Engagement</td>
</tr>
<tr>
<td>4</td>
<td>OHS incident reports</td>
<td>Occupational Health and Safety</td>
<td>Incidents</td>
</tr>
</tbody>
</table>

Assuming that the Academic Board agendas and minutes in the first example are master/original copies, the disposal class applicable is 0050/2000/2. The following information is provided for this disposal class in the RDA:

| 0050/2000/2 - (Disposal Class) | Master set of minutes, agendas, reports, resolutions, submissions and other meeting papers for Academic Board. |

**DATES OF COVERAGE**

-  

**DISPOSITION ACTIONS**

- Permanent - Retain as University Archives
- Transfer hard copy original or electronic original to Records Services after administrative use concluded

From this we can determine that these are permanent records that must be transferred to Records Services when business use has concluded.

The next class in the ‘Academic Programs/Committees’ function/activity group is 0050/2000/3:

| 0050/2000/3 - (Disposal Class) | Reference or duplicate copies of minutes, agendas, reports, resolutions, submissions and other meeting papers for Academic Board. |

**DATES OF COVERAGE**

-  

**DISPOSITION ACTIONS**

- Temporary - Destroy 1 year after last action completed
- Hold in work unit after administrative use concluded until the records are due for destruction

From this we can determine that if the Academic Board agendas and minutes were reference or duplicate copies, they must be held in the business unit for one year after the last action is completed (note that it is up to the business unit to determine what the last action is), before being destroyed.

In some cases (particularly legacy records), you may need to do some investigation to determine the appropriate disposal class. For example, you will need some information on the project being undertaken in the third example above in order to sentence the records appropriately. If it was a successful project involving a large community group, funding grants and an end product such as a book, it could be sentenced under disposal class 0200/5300/1 as a significant joint venture. If it was small or didn’t go very far, it could be sentenced under disposal class 0200/5300/2 as a small-scale engagement.
The following information is provided for disposal class 0650/7650/1 in the RDA, which relates to student files:

**DISPOSITION ACTIONS**
- Temporary - Destroy 7 years after completion or abandonment of, or withdrawal, discontinue or termination from course
- Hold in work unit after administrative use concluded until the records are due for destruction

The first part *(Destroy 7 years)* tells you how long you need to keep the record – but it’s the second part *(after completion or abandonment or, or withdrawal, discontinue or termination from course)* that tells you when that seven years starts. This is known as the **trigger**.

The trigger can significantly alter how long the record is actually retained. For example, consider two students who both start their course in the same year – one takes three years to complete and the other takes six years. The student file for the second student will be kept three years longer than the file for the first.

To determine when a record can be destroyed you need to:

- identify the date when the trigger was met
- add the retention period to the trigger date
- round up to 1 Jan in the following year for safety

e.g. A student withdraws from their course on 12 Apr 2014 – this date is the trigger. Applying the retention period of 7 years, their student file must be kept until 12 Apr 2021. To be safe, you would say that the file could be destroyed after 1 Jan 2022.

### 3.4. Appraisal of digital records

Appraisal and sentencing of digital records can be particularly difficult because they usually exist in large volumes. Large-scale assessment of digital records requires time, especially when the records have been managed in an uncontrolled manner.

When appraising digital records, Records Services recommend that you:

- implement the appraisal in stages, breaking the volume of work down into more manageable parts
- enlist the help of colleagues who have some knowledge of the records
- delete records you can easily identify as eligible for destruction under normal administrative practice (NAP), including personal records
- prioritise records created by senior staff and staff with decision-making responsibilities
- contact Records Services for guidance and advice if you come across records of high importance or records that you do not have sufficient knowledge to assess

As an interim measure, you may transfer digital records to portable hard drives for later appraisal. Records Services can provide advice on appropriate storage options.
4. Managing temporary records

This section of the toolkit covers storage and destruction of temporary records.

4.1. Storing temporary records

Temporary records must be stored securely during their retention period, in a manner that prevents them from deteriorating or becoming lost.

Hardcopy records

Follow these steps for storage of hardcopy records that are no longer required for business use:

1. Purchase appropriate boxes. Records Services can suggest strong and durable boxes if required.
2. Box records according to their year of destruction, i.e. the year from which they can be destroyed.
3. Complete a list of records contained in each box (a ‘box list’), including the disposal class applicable to each record. Records Services can provide a box list template if required.
4. Include a hardcopy version of the box list in each box and keep a separate electronic version on file.
5. Write the year of destruction on the boxes.
6. Keep the boxes securely until they are eligible for destruction.

Digital records

Ideally, digital records should be stored in an enterprise recordkeeping system such as TRIM. If this is not possible, they can be stored on an electronic medium such as a shared network drive or a portable hard drive. Follow these steps if you are using a network/portable drive to store digital records:

1. Contact Records Services for advice on appropriate storage media.
2. Organise the records using the University’s enterprise classification scheme.
3. Create folders based on year of destruction, as this will make identification of files that are eligible for destruction much easier.
4. Create a list of records contained in each folder, including the disposal class applicable to each record. Records Services can provide a list template if required.
5. Keep the files securely until they are eligible for destruction.

4.2. Destroying temporary records

Temporary records can only be destroyed when they have reached the end of their retention period (i.e. when they are ‘time-expired’).

Hardcopy records

Follow these steps to destroy hardcopy records that are time-expired:

1. Order a destruction bin using the PCS website.
2. Complete a Records Destruction List. If the record details are already recorded in an electronic version of a box list, this information can be transferred to the Records Destruction List.
3. Ensure the Records Destruction List is signed by the records custodian and level 2 manager.
4. Scan the signed Records Destruction List and save electronically to an appropriate location that is known and accessible to relevant staff.
5. Place the records in the destruction bin. (Do not do this unless the Records Destruction List has been signed.)
**Digital records**

Follow these steps to destroy digital records that are time-expired and stored on a network/portable drive:

1. Complete a [Records Destruction List](#). If the record details are already recorded in an electronic list, this information can be transferred to the Records Destruction List.
2. Ensure the Records Destruction List is signed by the records custodian and level 2 manager.
3. Scan the signed Records Destruction List and save electronically to an appropriate location that is known and accessible to relevant staff.
4. Delete the records from the network/portable drive. (Do not do this unless the Records Destruction List has been signed.)

If you are using TRIM to store digital records, the process for destruction of temporary records is as follows:

1. Records Services run reports periodically to identify records that are eligible for destruction based on disposal class.
2. Records Services contact the records custodian for authorisation to destroy time-expired records.
3. Records custodian authorises destruction of the records.
4. Records Services destroy the authorised records and information (metadata) about the destroyed records is kept in TRIM.
5. Managing permanent records

This section of the toolkit covers storage of permanent records.

5.1. Transferring permanent records to Records Services

Permanent records are retained forever because of their historical, social, legal or administrative value. They must be transferred to Records Services for long terms storage when they are no longer required for business use.

Hardcopy records

Follow these steps to transfer permanent hardcopy records to Records Services:

1. Contact Records Services for advice and to confirm that the records must be kept permanently.
2. Records Services will provide you with acid-free boxes.
3. Follow the Records Services guidelines for boxing permanent records.
4. Complete a records transfer list.
5. Forward the records transfer list to the records custodian and level 2 manager for authorisation to transfer.
6. When transfer is authorised, Record Services will arrange uplift of records (i.e. take the records into their custody).

Digital records

Follow these steps to transfer permanent digital records that have been stored on a network/portable drive to Records Services:

1. Contact Records Services to confirm that the records must be kept permanently.
2. Records Services will determine an appropriate method of transfer and advise you accordingly.

If you are using TRIM to store permanent digital records, they will automatically be retained permanently based on how they have been classified in TRIM. You can transfer custody of permanent records in TRIM to Records Services when they are no longer required for business use. Contact Records Services for further information.
6. Further information

We understand that records disposal can be challenging. If you would like further advice after reading this toolkit, visit the Records Services website or contact Records Services via email to records-services@unimelb.edu.au.

Resources

- Guideline - Implementing a Disposal Programme
- Recordkeeping Standard Disposal PROS10/13 V1.1
7. Appendix 1: Normal Administrative Practice (NAP) Workflow