



Association of Commonwealth Archivists and Records Managers

ACARM Records Management Guides

6 Records Disposal

Definitions

For the purposes of this Guide, the term *disposal* is used to cover the final action taken on records. This involves assessing:

- whether records are archival and should be kept permanently in archival standard storage with appropriate access provision, or
- if they are not archival, how long they need to be kept and when they can be destroyed

Appraisal is the term used to describe the evaluation of whether records are archival as well as how long records need to be kept before they can be safely destroyed.

Closing records

The first step in managing records disposal is to ensure that records, both paper and electronic, are closed when it is appropriate to do so. This is to ensure that records are no longer active before they are moved out of current recordkeeping systems and that the system is not full of inactive records. If records are closed but not formally designated as such, they cannot be identified for disposal. There are several triggers for closing records:

- No addition of material to the file – either addition of material or retrieval/access
- File not retrieved or accessed after a specified period
- End of project or cycle
- The file (or electronic folder) exceeds a certain size
- A specified number of years after the file was opened

If the file or electronic folder needs to be continued after one of these triggers has occurred, a new part can be opened.

Paper files should be marked closed when they are formally designated as such. Electronic folders should be tagged so that the metadata indicates the record is closed. Closed records should also be indicated on any record list, database or index.

Appraisal

Appraisal is not just the process of determining the medium to long term value of a record. It also involves determining what the records are (or what they will be once they are created), who creates them and why, how they relate to the creating agency's functions and to other records, how, when and by whom they are used. Once all this information is known, the continuing utility or enduring value of the records can be assessed. The appreciation and analysis of the context of a record is a vital part of the overall process of appraisal.

Deciding what records should be kept and for how long is an important task for all organisations. A feature of government and business in the twentieth century has been the phenomenal growth in the quantity of records generated. The advent of the information age and electronic records has only accelerated this process. Records and information need to be retained for only three main reasons:

- For business purposes, as long as the need to consult them exists
- For legal reasons, as evidence of title/precedence or under various statutory provisions
- For historical value

The retention of too many records is expensive in terms of staff, time, space and equipment. It is dangerous to think that you can keep everything in electronic form because storage is so cheap. Up to a point this is true, but what happens when systems are upgraded and you need to migrate information to new platforms or new software? It is then that record keeping can become very expensive. Changing computer systems is the electronic equivalent of moving accommodation – time to have a clear-out – only electronically it can be much more difficult and expensive. It is much better to have a system of regular disposal in the first place.

Every organisation should have a policy on what records and information it will earmark for permanent preservation because of their historical value. Such a policy will set out the values which guide the selection of such records. It should be drawn up after consultation with appropriate stakeholders and should be published.

Several different systems of appraisal have been formulated over the years.

File by file review

This involves the examination of individual files to decide, within an overall appraisal framework, whether they are of historical value. In the paper world it has typically been undertaken in two phases – a first review after 5 to 10 years to eliminate all records of no further business use and of no historical value, and a second review to select those records which are worthy of permanent preservation in an archives. It is a very time-consuming practice and has become increasingly difficult to undertake as the amount of records generated has increased.

Appraisal at the series or group level

A record series is a group of records that supports an activity which results in many different instances of the same type of record, for example personal files where each file relates to a different member of staff but the contents of the file are very similar to the other files in the series. An appraisal value for all files in the series can therefore be established. This ensures consistency and cuts down on the time and resources needed to make appraisal decisions.

In undertaking appraisal by series the retention period is dependent on a number of factors:

- Whether the records are masters or copies
- How important the function is that the records support
- What the creators and users of the records say about their requirements for access to the records
- Current retention practice
- What the legal or regulatory requirements exist
- Requirements of any authorising body such as archival authority and/or auditors
- What interests or rights any stakeholders might have
- The relationship between the records and other records, and the data or evidence that the latter provide
- Whether there is any significant risk to the organisation should certain records not be retained

Macro appraisal

Macro appraisal methodologies have gained greater prominence with the increased creation and use of electronic information. Far more records are

created in an electronic environment than in the paper world. Work patterns have changed over the years and there is an unquenchable thirst for more information. Electronic systems will often create this information automatically – it does not have to be entered in the form we want to use it. This mass of information cannot be appraised in the same way as paper records. A higher level evaluation needs to take place. This may mean losing some information which might normally have been selected in paper methodologies or even selecting some information which would normally have been discarded with traditional methodologies. The records manager needs to strike a balance between this possible loss and losing all the information by not appraising in time.

The focus of this process is the structure of records and information. It can be defined as assessing the value of records at an organisational, departmental or unit level rather than at an individual document or file level. The methodology requires the examination of an organisation's structure, what it did, how it did it, why it did it, what it does now and how it does it. The focus is on identifying what parts of the organisation (and following from that what parts of its file plan) contain information that is likely to be of long-term value. A key to the analysis is to understand the position of file prefixes, units or departments in the wider organisational context. The aim is focus on key documents so that selection can be targeted accordingly.

The results of the macro appraisal analysis should be documented, in the form of a report, so that they can be referred to in future appraisals. The analysis will help in the development of disposal schedules and will serve as a useful guide to future development of file plans.

When folders in the file plan that contain information fitting the selection criteria are identified they will be selected and transferred accordingly.

What to select for permanent preservation

In arriving at appraisal decisions, it is firstly necessary to determine whether information contained in records is unique or exists elsewhere. The information in the records may be wholly or substantially available in a variety of other sources and forms. For example, the same information may be found in

- records in other formats (maps and plans) or other media (microforms, electronic systems)
- other records of the organisation, such as regional and local offices
- the records of other organisations
- published works

The American archivist Theodore Schellenberg set out an appraisal model in the 1950s in which he argued that the value of records could be divided into two basic categories: primary value and secondary value; primary value could be further subdivided into three values – operational, financial and legal – and

secondary value could be subdivided into evidential value and informational value. For further information on Schellenberg's theory see

Intrinsic value – the value by reason of age, historical association, physical form or features, aesthetic or artistic quality or monetary value. With intrinsic value, it is the uniqueness of the association or form of the record rather than the uniqueness of the information that is the determining factor. For example, the constitution of a newly independent country may be widely available in print, but the original, signed at independence, will clearly have intrinsic value. Similarly, an ephemeral document bearing the autograph of a head of state may have intrinsic value, whereas the same kind of document signed by other persons would not.

The following types of records may be identified:

- records that relate to notable events or persons and that add significantly to what is already known about them
- records that relate to major developments or trends in political, legal, social, economic or cultural history
- records that relate to significant scientific, technological, ecological or medical research and development
- records that document significant regional or local events, personalities or conditions, where these are not reflected adequately in other records
- records that are suitable for statistical and quantitative analysis for demographic, medical, social, cultural and economic history and historical geography
- control documentation that continues to serve as a means of reference to records of enduring value or to provide a useful overview of the activities that resulted in records that are not themselves of enduring value.

Disposal schedules

Disposal schedules, often known as retention schedules, are timetables which give retention periods and disposal actions for record series. Together with file plans, indexes and databases they provide metadata about the records which enable the records to be managed effectively, efficiently and in compliance with legislation, regulation, standards and best practice. In organisations which are just beginning to inventory their records, the disposal schedule could be the only source of information about whether the record series exist.

The benefits of disposal schedules

The main benefits of disposal schedules are:

- Faster retrieval of important records from record systems due to early elimination of records of no further business value
- Clear instructions on what happens to records when they are no longer needed to support the business
- Definitive periods of time for which records should be kept and remain accessible
- Consistency in retention of records across the organisation
- Compliance with standards and legal and regulatory requirements for retention of records
- Highlighting of records which require special handling due to sensitivity etc.
- Identification of archival records from an early stage in their lifecycle
- Elimination of duplicate records at the earliest possible opportunity
- Confidence that the master record has been identified and will be retained for as long as and no longer than required

For a very few records the action will be review, but review should be used sparingly as a disposal action as it is often decided on because of a lack of time or unwillingness to engage with the retention and disposal process. It is perfectly valid for records emanating from new functions or for complicated series where only a portion of the records or individual files should be retained.

Implementation requires the business unit to periodically review all records to identify those that are closed (or ready for closure) and are subsequently due for disposal. The records manager can send prompts and offer support in the review and housekeeping process but unless there is an organisation-wide EDRMS in place central monitoring will not be possible. Regardless of the mechanics of monitoring, records must be reviewed at least once a year to implement disposal actions and effectively maintain the record system.

Reviewing disposal schedules

Disposal schedules will not remain indefinitely valid. As organisations change, so do not only functions but also the records that support them. Disposal schedules should be reviewed regularly, especially immediately after initial development and implementation, to ensure that:

- Records which are included in the schedule still exist

- The action, retention period and trigger is still appropriate
- Records that are no longer created or received are removed from the schedule once the last records have been removed from the record system
- Any new record series are added to the schedule

Amendments and additions should be discussed with business units, agreed and subsequently authorised by senior management. Disposal schedules, including previous editions which were the basis of authorising record disposal, will need to be retained as long as other disposal documentation.

Destruction

Duplicate records should be destroyed. Where information has been regularly shared between departments/units, only the original records should be retained in accordance with agreed guidance. But be careful - care should be taken that seemingly duplicate records have not been annotated. Only one copy of each document should be kept as the corporate record.

The method of destruction of unwanted records will depend on their sensitivity (often indicated by a protective marking system –typically something like “*Restricted*”, “*Staff in Confidence*”, “*Personal*” or even “*Secret*”). Protectively marked waste, before destruction, should be clearly identified and kept separate from other waste.

Non-sensitive (no protective marking)

Ordinary rubbish bins may be used for material already in the public domain. Records which otherwise would not be made available to the public should be torn into small pieces and placed in a rubbish bag for collection by an approved firm.

Sensitive

- Restricted - waste should be strip-shredded and placed in paper rubbish sacks for collection by an approved firm.
- Confidential - waste should be placed in paper rubbish sacks for collection by an approved firm (it should be designated for shredding). The material should be pulped or burnt.
- Secret - waste should be cross-shredded or disintegrated using a grille size no larger than 6 mm and placed in paper rubbish sacks for collection by an approved firm. The material should be burnt.

When destroying electronic records, it is important to realise that just removing an electronic file from a directory does not mean the file has been destroyed. Reuse by overwriting is an option for magnetic media (computer tapes and disks, audiotapes and videotapes), but if the media contain sensitive information, total erasure or destruction may be necessary. When destroying restricted documents, especially those that are security classified, it is usually necessary to erase the entire disk or tape, in order to ensure that the file in question cannot be recovered.

There are a few websites covering the destruction of records. Among the most useful is www.bsia.co.uk

Documenting appraisal

It is important to document the reasoning behind appraisal decisions, for a number of reasons:

- Organisations need to maintain an audit trail of important decisions. In the case of public authorities in the United Kingdom, this is specified in the *Code of Practice on the Management of Records under the Freedom of Information Act 2000 (2002)*
- The archives institution must also be accountable for decisions about the permanent preservation of records that provide the historical accountability of the organisation
- It may be policy (either now or in the future) to re-examine appraisal decisions to determine if a more appropriate decision can be made. Access to the reasoning behind the original decision is essential.
- The research and analysis required to arrive at an appraisal decision can be of use for other purposes. In archival description, the documentation of appraisal decisions can provide vital information about the provenance of the records and may also help in the preparation of administrative histories and finding aids.

In essence the documentation of destruction of records must provide evidence that destruction has taken place in accordance with established policies and schedules. The kinds of documentation that might be kept are:

- Acquisition policies
- Selection policies
- Disposal schedules
- Record transfer lists and receipts
- Record transfer or presentation agreements
- Lists of records destroyed
- Certificates of destruction