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## User Guide to Retention and Disposal Schedules Council of Europe Records Management Project

Prepared by Margaret Crockett, Consultant Archivist and Records Manager

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#### Why read this Guide?

Do you feel you are drowning in information, that you are constantly dealing with email and papers, trying to take action and file them away so you can find them again with the other documents you need for your work? Have you ever not been able to find a record or file that you needed either because you can't remember where you put it or because a colleague has filed it somewhere you don't think to look? Do you find the annual or periodical file review time-consuming and inefficient because you keep having to re-invent the wheel?

Effective records management, underpinned by good retention and disposal schedules, is the only way to be sure you are managing the records that support your work as efficiently and appropriately as possible. This Guide tells you how to get the most out of your retention schedule.

#### Why is it important to follow the Guide?

This Guide tells you everything you need to know about your retention and disposal schedules. It explains what it is, how to use it and what the benefits of using it are. As a member of the Council of Europe's staff, you are obliged to follow Council procedures in managing your records. These procedures are based not only on professional records management standards and practices, but also on careful review of the Council of Europe's working practices and requirements. In particular the current records survey, which is reviewing or establishing the retention and disposal schedule for every entity, is looking in great detail at work processes and how the recordkeeping that supports the work can be improved to be as efficient as possible at the same time as ensuring that legal and business needs are met.

#### Who is this Guide for?

This Guide is intended for all Council of Europe staff.

- Archive Correspondents should be very familiar with it because they are the contact for the record survey and also responsible for ensuring their entity is both destroying/deleting records or transferring them to the Archive in a timely fashion
- Most staff will at some time or other in their working week either create or receive records to save into a computer system or place onto a paper file. They need to understand how to file properly (and ultimately how to save and classify records into the records management system) and how to dispose of records at the right time. They should also have input into the retention and disposal schedules development process, either as part of the survey or by reviewing it prior to formal authorisation.
- Assistants have a general administrative responsibility and frequently undertake a lot filing and document creation on behalf of other colleagues. They need to ensure that the filing systems are set up and work properly and that they destroy, delete or send records to the Archives at the right time.
- Managers need to be aware of the purpose of the retention and disposal schedules. They should review the entity's retention and disposal schedule prior to confirmation and, if they are the senior person in the entity, sign off to authorise it. They also need to be aware of the responsibilities of their staff in following the retention and disposal schedules and records management procedures.

#### I. Introduction

This guide explains what retention and disposal schedules are and how they can help Council of Europe staff to look after records. Special emphasis is put on the new "style" of retention and disposal schedules, as required by the introduction of a Records Management System (RMS).

The new schedules will be more comprehensive than the old ones. They will also respond to the need to address both records management and document management, as well as the necessity to manage both paper and digital records in a hybrid environment during transition to the RMS.

The new retention and disposal schedules will also look different because they will follow the functional approach which is being applied to records management at the Council of Europe. However they will still tell staff if the records are archival or when they can be destroyed. Because it covers all records, the schedule itself becomes the entity's file plan. Moreover, it supports "total" records management and staff can be confident that all records (whether paper, audio, photographic or digital, whether substantive or transitory) are taken care of in an effective system.

Whilst each entity's schedule refers exclusively to its own records, there is an overview of all schedules and all records within the archives team. This ensures consistency in retention and disposal practice and filing practices as well as eliminating duplication. In summary, the retention and disposal schedule is the primary control tool for records management, supporting classification and filing, retention management, space management and access and confidentiality.

#### II. What is a retention and disposal schedule?

A retention and disposal schedule is a timetable that sets out how long records need to be kept before it is safe to destroy them. It also identifies the records that need to be kept permanently in the Central Archives or other location. Each record (paper file, set of minutes, electronic document, photograph/digital image, audio cassette, film reel etc.) is not listed individually in the schedule: it is represented in one of several categories, called series, that are based on the activities of the Council of Europe. The records support and document these activities. A retention and disposal schedule usually covers all the records of an entity, so the Council of Europe has many schedules.

In addition to the retention and disposal schedule pertaining to each individual entity, there will be a common schedule for non-operational records that are found in many entities (for example to do with staff management or accounts and budgets).

Retention and disposal schedules work with the *Weeding guide* as part of the overall records management programme. Schedules tend to deal with the whole file or folder and indicate the retention action to be carried out on the complete file. Weeding entails assessing the contents of the file/folder as separate items.

In the Council of Europe the retention and disposal schedule also acts as the entity's file plan. The various record series identified correspond either to paper files or will be the basis for a folder structure in an electronic system. Under each record series the entities will organise sub-folders (the equivalent of paper files) according to their working needs.

#### III. How is a retention and disposal schedule developed?

Retention and disposal schedules are developed together by the archives team, who are expert in organising and maintaining paper and electronic recordkeeping systems, and the producing entity, the people who create and use the records. The process is as follows:

- 1. A records survey is carried out to identify the records. This can be done by interviewing the producing entity or by sending a questionnaire. The survey aims to gather data on the types of records, including:
  - The activities that they support

- Whether anyone else in the Council of Europe needs to use the records
- If there are any laws or regulations that govern how long the records should be kept
- Whether the information is sensitive for example because of personal data, for diplomatic reasons or reasons of commercial confidentiality
- If the records document the core history of the Council of Europe
- Whether the records are vital for ongoing work in the event of a disaster
- 2. The archives team draws up a draft retention and disposal schedule, based on the interview conducted with staff in the entity. This requires:
  - Analysis of the data on the records as well as the activities of the producing entity
  - Research into the laws, regulations and usual practice with respect to how long the records should be kept
  - Assigning the retention period and action (usually destruction or transfer to the archives) at the end of the period
  - Documenting the records, the retention periods, the reasons and any other relevant information – such as confidentiality – in the schedule
- 3. The draft schedule is reviewed by the producer department and any amendments agreed before the schedule is finalised
- 4. The schedule is authorised by both the head of the Information Management Division (IMD) and the producing entity's senior manager

#### IV. The principles behind retention and disposal schedule development

Records managers follow two main principles in developing retention and disposal schedules:

#### 1. Records are grouped into record series

A record series is a group of records which provide evidence of and support the same activity.

A good example for paper is country monitoring files, which occur in the various monitoring mechanisms of the Council of Europe: there is a file for each country with the same kinds of information on it (e.g. monitoring report, previous monitoring reports, mission reports, correspondence with officials in the country), but particular to the country which is being monitored. It supports the activity of monitoring a specific country, as the other files in the series support the same activity of monitoring, but of other countries. All the files together make up a record series.

A record series supports the same activity, but it also reflects retention and access needs, so one record series has a unique retention period and access level.

An advantage of using an RMS is that retention and access requirements are defined once for a record series and automatically inherited to all records which are filed into it. Thus, the management is less onerous.

# 2. Retention periods are based as far as possible on the activities which the record supports

Records take on the value of the activities which they support. Therefore records of the Council's core activities will have a different value than the records of the Council of Europe's administrative functions. This value can change over time – usually the value of the record, both to the creator and to other users, will diminish over time. The main principle is that the activity indicates why the record has been made, the importance of keeping it and how long it will be needed for in the context of the work of the creating unit.

A standardised approach to activities is therefore necessary. Activities will be selected from the Organisation's functional classification scheme (in the process of development) which lists all functions and activities. If an activity is missing, it will be added.

#### 3. Retention periods reflect the Council of Europe's fiscal and legal obligations

The Council of Europe operates according to a complicated set of legal and fiscal obligations such as privacy regulations and legislation specific to countries in which it operates. The retention and disposal schedules will comply with these obligations.

#### V. How are retention and disposal schedules used?

Retention and disposal schedules are used as checklists to calculate whether records or information should be:

- moved into different storage (this may be physical storage with filing cabinets or file boxes on shelves or in cupboards in a paper environment, or network drives, digital repositories, or electronic records management systems in the electronic arena)
- subject to treatment, migration or removal to different accommodation to ensure they are preserved, legible and accessible for as long as necessary
- transferred to the archive (a physical storage facility or a digital repository)
- destroyed

Record creators usually review their records once a year and use the schedule to find the records which are old enough, according to the schedule, to go. Staff needs to make the calculations for each file, based on its closure date.

Take invoices, for example, which should be destroyed 10 years after the end of the calendar year in which they were paid. Depending on how the paper invoices are filed (this could be chronologically or by vendor or by entity) staff will need to identify the files due for destruction each year. In the RMS the disposition (e.g. destruction), will be managed automatically.

The retention and disposal schedule also acts as the authority for the destruction action – and is part of the documentation. It provides part of the evidence that records have been destroyed according to a properly implemented records management regime.

#### VI. The benefits of retention and disposal schedules

Retention and disposal schedules document the Council of Europe's decisions about how long records should be kept and the actions that should be taken. There are five main benefits to having properly drawn up, agreed schedules:

- 1. Deciding what to do with older records is simple: it is not necessary to evaluate the same kinds of records again and again over time because the schedule acts as a reminder of what to do. In this way, retention and disposal schedules **save staff time**.
- 2. Retention and disposal schedules govern the routine destruction of records that are no longer needed. They facilitate **the optimal use of storage space** ensuring that no money is spent maintaining record storage for records that are "dead".
- 3. Retention and disposal schedules document the process and allow for **transparency and accountability in record retention and destruction**, part of the overall records management function.
- 4. Ensuring **consistency in retention policy** throughout the Council of Europe because retention and disposal schedules are linked to the Council of Europe's functional classification scheme.

#### VII. How retention and disposal schedules work

#### Part of records management

Retention and disposal schedules are part of records management. Most staff in the Council of Europe are already doing records management to some degree when they file paper records, save electronic documents or label up photographs or films. This is recordkeeping, and records management covers anything to do with recordkeeping. It aims to:

- Create and collect the necessary evidence and information to support the Council of **Europe's work**. This can be done through paper filing systems, the computer systems and servers, the photograph collections or the video and film libraries. Ensure the records are organised so that documents and data can be found and referred to when needed quickly and in such a way that related material is also easily identified if required. This is done through file plans, library classification schemes, indexes, and business classification schemes - depending on the type of record and its media.
- Ensure that records are **only kept for as long as needed** to support the work of the Council of Europe and to comply with any relevant laws, regulation and best practice. This is done by surveying, analysing and evaluating the records and documenting the results as retention and disposal schedules and acting on the schedule stipulations.
- Identify and preserve the historical archives of the Council of Europe.
- Document records management so that all activities have procedures and can be simply recorded to provide evidence about why records are destroyed, when they are destroyed and according to what authority.

Records management also aims to eliminate duplication both within and across media and to manage version control so that staff always know which is the most current version of the document.

#### VIII. What retention and disposal schedules contain

Retention and disposal schedules should contain information about the record series to enable the records to be identified. They also need to contain the detail about how long records should be kept and what happens to them at the end of that time. The producing entity which owns the records also needs to be included in the schedule. It can also contain information about what media the records are, where they are kept, if they contain sensitive data, if they are vital records and need to be protected and accessed in the event of a disaster. Any authorisation details will also be recorded in the schedule. Here is a list of data that should be covered in the schedule:

- . Record series title (and a description if necessary)
- Activity which the records support
- Media
- Master or copy
- Retention period and action (disposition)
- Reason for the retention period and action (disposition)
- Confidentiality issues (personal data, diplomatic sensitivity)
- Entity details
- Authorisation details (signature and date)

#### IX. What retention and disposal schedules look like

Retention and disposal schedules are lists of record series. They can look like an excel spreadsheet, a Word table or free-text document. They can also be in databases and look like datasets from which reports are generated.

A template is annexed.

#### X. How to implement retention and disposal schedules

#### First time use

If the producing entity is using the retention and disposal schedule for the first time, it is likely there will be a backlog of old records to sort out. It is also possible that the older records do not exactly correspond to the record series in the retention and disposal schedule. The process to follow is:

- 1. Check all paper, digital and other records to identify those that either have been closed or should be closed because the business is complete, or because the entity has been closed (e.g. because of reorganisation).
- 2. Make sure that the records are grouped into the correct series.
- 3. Check the closed folders against the schedule to ascertain what action should be carried out and when. Remember that the calculation of the time for transfer or destruction is done by adding the retention period to the date of closure. If a file should be destroyed when it is 3 years old and it was closed in December 2009, it should be destroyed in December 2012.
- 4. If records are not clearly identified in the schedule, the producing entity will need to consult with the archives team to either match the records to the appropriate series in the schedule or to add a new series to the schedule.
- 5. If there are records which are not yet due for destruction, they can be boxed up and labelled in groups according to series or record destruction date to make the destruction process quick and simple to carry out when the time comes. These records can go into intermediate archives storage. For electronic records in the RMS this intermediate stage will no longer be needed.

This initial exercise is a good time to review all recordkeeping processes in the entity to ensure that the records are organised in a way that ensures managing records is as streamlined as possible.

#### XI. On-going use of the retention and disposal schedule

Once the initial backlog has been dealt with, and older records have been organised to make their later destruction (if applicable) a quick and simple task, entities should make time on a regular basis to act in accordance with the retention and disposal schedule. It is a good idea to do this in conjunction with weeding work.<sup>1</sup> Usually this will be about once a year at a time that fits in with the rhythm of the producing entity's work. The process involves closing files that need to be closed; weeding off any superfluous material, identifying closed files that are due for transfer or destruction and transferring or destroying them; and documenting what has been done following the procedures as set out in *Archiving procedures at the Council of Europe*.

There are number of different actions required by the retention and disposal schedule, as follows:

- Transfer to intermediate archives storage whether in the Palais at the Central Archives or the Agora storage place – involves listing, boxing up and labelling closed files, so they can be moved to storage (thus freeing up space in the office) but remain controlled through the list and the schedule and can be destroyed or transferred to the archives at the right time. This is not applicable to digital records.
- Destruction or, in the case of digital records, deletion. This involves documenting details of the records destroyed together with reference to the schedule as well as secure physical destruction or electronic deletion of the records.
- Transfer to archives, which involves listing the records and sending them to the Central Archives in accordance with archival procedures.

<sup>&</sup>lt;sup>1</sup> See <u>Weeding guide: sorting archive paper and electronic documents</u>, DGAL/DIT/ILCD(2010)04

#### XII. Review process

Retention and disposal schedules can get out of date, especially when there is reorganisation, the work of the entities changes or a new technology for managing records is introduced. There will be regular reviews of schedules, every two or three years. If schedules seem to have gaps or record series which are no longer created and used, the archives team can help review the schedule and update it as appropriate.

#### XIII. Glossary

#### **Classification scheme**

A hierarchical arrangement of classes, grouping "like" things together. For organising its records, the Council of Europe uses a functional classification scheme which is complemented by a record series scheme which corresponds to the entity's file plan.

A functional classification scheme, also called business classification scheme, is a conceptual representation of the business functions and activities of a specific organisation. According to ISO 15489 on records management, records are best managed as evidence of business activities because they arise from and support the activities which in turn determine the value of the records when it comes to assigning retention periods. A classification scheme can be implemented in an electronic system as metadata or as folder structure.

#### Document

"Recorded information or object which can be treated as a unit", regardless of format or medium (physical, digital or analogue, text, data, graphics, images, moving images or sound). Based on ISO 15489-1]

In records management, a document is a single item in a record group which cannot be divided and documents something; it may be physical or digital. Often used interchangeably with record.

#### Record

A record is any document created or received by the Council of Europe in the course of its activities that provides evidence of decisions or action taken. Records may take the form of texts, publications, images or audio recordings, in either physical or electronic form.

#### Retention and disposal schedule

Archive and records management tool drawn up jointly by the producer department and the archives team. It reflects the department's administrative organisation and determines the final action to be taken (destruction or permanent preservation) for records. In the Council of Europe it also acts as the entity's file plan. Sometimes referred to as disposal schedule.

#### **Record series**

A group of records or files that all pertain to the same activity and which have the same retention period and access level. For example: committee meeting minutes; exchange relating to external enquiries; budget documentation; invoices. Sometimes referred to as file or document series.

#### Transitory records

Not all records need to be kept. Transitory records can usually be disposed of once their immediate usefulness has passed. Typical examples of transitory records are: receipt confirmations, printout of electronic records, duplicate copies, draft versions, external information resources and so on. Transitory records are indicated as such on the retention schedules, so that they can be destroyed, but they will not be filed into the records management system.

#### Vital records

Records which are vital to the continuity of business in cases of emergency or after a disaster. Vital records are those that support the vital functions of the Organisation.

#### Weeding

The act of going through files to identify and remove ephemeral and duplicate material.

#### XIV. Further reading

Related documents: see Archives website: http://www.coe.int/t/dgal/dit/ilcd/tools/archiving EN.asp

Portail International Archivistique Francophone, *Module 04 – Gestion des documents actifs / Traitement des archives courantes, www.piaf-archives.org/espace-formation/mod/resource/view.php?id=105*, accessed 26 September 2011

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Stephens David O., CRM, FAI, and Wallace Roderick C., CRM (2003), *Electronic Records Retention: New Strategies for Data Life Cycle Management*, RMA international, Lenexa, Kansas, 196 p., ISBN: 978-1-931786-08-9

U.S. National Archives and Records Administration, "What is Records Management" in *Frequently Asked Questions about Records Management in General*, <u>www.archives.gov/records-mgmt/fags/general.html#whatrm</u>, accessed 26 September 2011

United Kingdom National Archives ('2010), *Guide 1 What is records management?* <u>www.nationalarchives.gov.uk/documents/information-management/rm-code-guide1.pdf</u>, accessed 26 September 2011

#### Appendix

### Retention/Disposal schedule

Series: title, description	Master / copy	Medium, format & storage	Retention period	Disposition	Access level classification	Notes / Rationale	Folder structure		
[Activity in the classification scheme]									