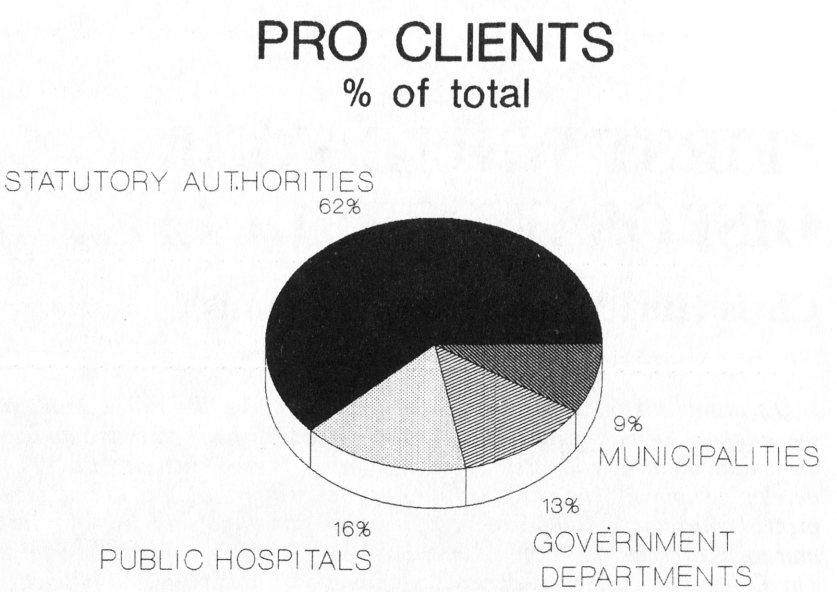
"FIRST WRITE YOUR DISPOSAL SCHEDULE . . ."

Chris Hurley and Sue McKemmish

Discarding the model of the "ideal" comprehensive disposal schedule as the solution to managing records disposal, serving both records management and archival ends, the Public Record Office of Victoria (PROV) is developing appraisal and disposal strategies more appropriate to the management of enormous quantities of records in both traditional and newer formats and to its role as the archival authority for the Government of Victoria. The Office is focusing on disposal planning that maximises the impact of the limited resources available to a public records disposal program. Scheduling survives in this context as a useful tool, one of a range of techniques, appropriate as a strategic response in some cases, but not in others. A key test of its appropriateness in any given situation is value for money, the resource-impact factor—does it achieve the most effective result for the least possible cost in terms of people, equipment, accommodation and systems.

DISPOSAL PLANNING

Under its establishing Act, the PROV has responsibility for records of Victorian government departments, statutory authorities, courts, public hospitals and schools, universities and colleges, and municipalities. It faces an enormous challenge—how to subject information processing systems across all levels of government in Victoria to disposal appraisal and authorisation, and achieve its related archival and records management goals of identifying and preserving the State's archives, promoting efficient records management and timely disposal action, and ensuring the integrity of the public record. Recordkeeping practices and disposal actions must be evaluated against broader criteria than immediate administrative requirements or the interests of any individual government agency—or indeed of the government of the day. Fundamental to the role of a government archival authority is modern-day democratic systems is the notion of information about the activities of government being "on the public record". The integrity of the public record and protection of the



community's rights of access, for example through an appropriate mix of Freedom of Information and archival access arrangements, are underpinned by public records disposal programs which ensure that public records are not destroyed without proper evaluation and authorisation.

In developing its disposal programs to meet the public records disposal challenge, the PROV has evolved a disposal planning package for paper records which offers to government agencies a range or mix of strategies designed with a view to the resource-impact factor. Appraisal and disposal techniques best suited to an agency's needs and priorities, as well as the PROV's goals, are used. The PROV's advisory services, training programs and *Managing Disposal Series* of booklets aim to promote disposal planning based on analysis of an agency's functions, recordkeeping systems, information needs and resource management requirements, including consideration of:

- the nature of the records in terms of related functions, quantities, growth rates, type of system, ease of classing for disposal purposes, currency and likely archival value
- an agency's accommodation problems—is there is a need to clear out accumulations of records, deal with backlogs of obsolete records or provide for continuing disposal of records with a rapid growth rate
- the cost-effectiveness of employing particular strategies or techniques in terms of the resources expended and the projected savings in storage space and equipment freed
- the effect on information retrieval and accessibility.

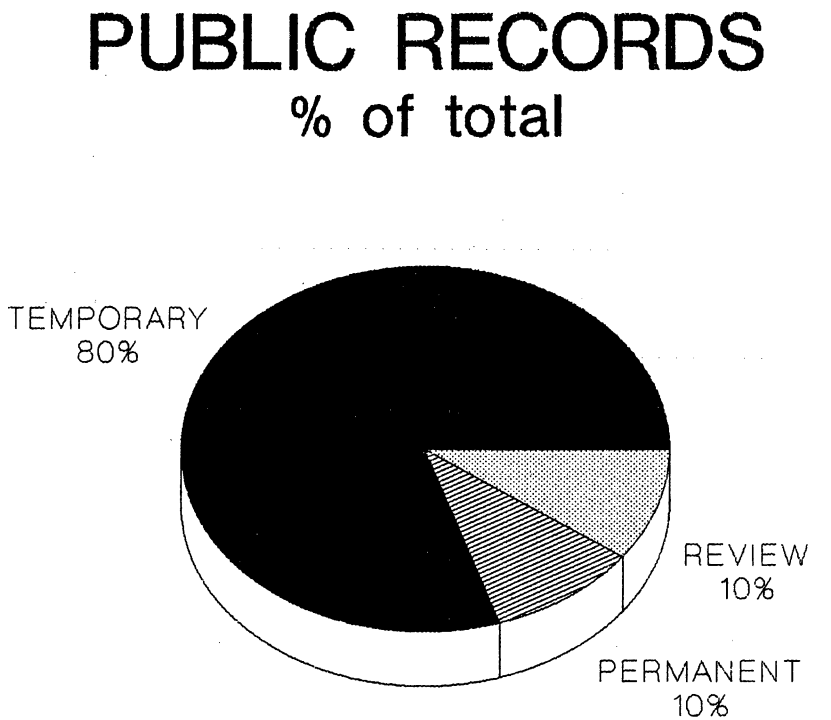
Agencies are encouraged to build into their disposal planning provision for the development of authorised disposal arrangements for all records, in whatever media, and cost-effective use of records-related resources—accommodation, equipment and people.

Within this context, the PROV has more clearly defined its basic premises for determining archival value, and reevaluated its disposal strategies and techniques. The disposal schedule, the various scheduling methodologies that have traditionally been applied, and case-by-case authorisation have been reassessed in terms of their effectiveness as records management tools, as means of identifying records and providing for their preservation, and as disposal authorisation techniques, applying the value-for-money test.

DETERMINING ARCHIVAL VALUE: THE BASIC PREMISES

The PROV's approach to appraisal of paper records is based on two premises. Firstly we calculate that of all the public records produced no more than 10% can survive as archives. This is an economic issue, not an appraisal one. Undoubtedly some records of archival value will not survive. It is a question of how much our society—or any society—is prepared to pay for its archives. Determining which 10% will survive is a matter of relativities not absolutes. Of the remaining 90%, we estimate that at any one time 10% might fall into a review category. Secondly we are guided by broad categorisations in making our initial appraisal of whether records fall into the permanent, review or temporary segment. The permanent segment typically comprises general subject correspondence (purged of large runs of easily identifiable and segregated temporary material), summary records, people and property status records, reports, policy records, registers and indexes, and samples of case, particular instance or transactional records. The review segment is made up of records that require detailed appraisal to determine their archival value or more time to elapse since their creation to enable ready identification as either permanent or temporary. The temporary segment is largely made up of case, particular instance and transactional records and duplicates. While the majority of case and particular instance records fall into the temporary category, special types of case or particular instance records, notably those which establish the existence, status and rights of people in law, in terms of citizenship, residency, marital status, family membership, rights to liberty, to manage their own affairs, to own and inherit property and so on, form part of the permanent category, for example immigration and naturalisation records, registration records of births, deaths and marriages, titles records, prison registers, and records of committal to psychiatric institutions.

One of the first steps in deciding the appropriate strategies and techniques to apply in a given situation is to appraise the records in terms of these



broad categorisations. Two other significant considerations at the initial appraisal stage are:

- whether the records are still being created
- whether continuing disposal action is required.

REASSESSING THE ROLE OF DISPOSAL SCHEDULING

Assessments have been made of the strengths and weaknesses of the disposal scheduling technique, the situations in which it provides the most cost-effective results, and the ways in which scheduling can be refined and honed to suit the purposes of records disposal in the public sector.

These assessments have resulted in the rejection of the inventory approach to scheduling, the restriction of the use of comprehensive scheduling to simple recordkeeping systems, the abandonment of scheduling as an appropriate technique for general subject correspondence, obsolete records and records that do not require continuing disposal action, and experimentation with general disposal schedules, schedule structures and disposal classing.

The Inventory Approach

Schedules which are little more than registry inventories, extrapolations of the physical process of examining each file—or in some cases each document—and determining sentences, have proven to be a laborious and ineffective use of resources. They are usually only applicable to the records in the system at the time, having no continuing validity; the overall thrust of the appraisal criteria is obscured; they are most resistant to administrative and systems changes. Such schedules are hopelessly impractical for use throughout a public sector system. Agencies do not, on the whole, have the resources or inducement to prepare and maintain them, nor does the archival authority have the time to evaluate, approve and issue them.

Comprehensive Scheduling of Complex Systems

Disposal classing enables the construction of schedules of continuing application. However classing can be problematical in some circumstances. Classing complex systems comprehensively is simply not cost-effective and the resulting schedules are seldom comprehensively applied. In complex systems we look for large, easily identifiable disposal classes. Typically, disposal classes vary enormously in the proportion of the records they cover—15% of the classes may relate to up to 75% of the records. The PROV encourages agencies to develop partial schedules comprising those classes only.

A fatal flaw in comprehensive scheduling generally is that, to pursue the example, 85% of an agency's resources can be spent on 25% of the records. This is not cost-effective. The final result is not all that different from that of the partial schedule since all the additional effort affects only 25% of the volume and part of that is likely to be permanent anyway. Time spent on comprehensive scheduling is time lost for work on other large, easily identifiable classes.

What then is to be done with the remaining 25%? In practice appraisal in many circumstances involves applying one of two alternative procedures:

- identifying records for retention and destroying the remainder; or
- identifying records for destruction and retaining the remainder.

Detailed appraisal, classing or enumeration and sentencing of all records is not necessary if the process is confined to one or other of these strategies. Disposal schedules, authorising continuing disposal action, or case-by-case approval techniques can be used as destruction or retention authorisation instruments. Permanent records segregated by either of these approaches need not be comprehensively scheduled, classed or categorised to ensure their preservation. This can be effected by putting in place appropriate transfer arrangements.

Thus the best possible use of resources when dealing with complex recordkeeping systems may be achieved in many cases by targeting for

destruction authorisation large easily identifiable classes of temporary records and making appropriate archival custody arrangements for the remainder. Appraisal may be reduced to examining file classification schemes, selecting headings with the greatest number of files, assessing the likelihood of the files being of temporary value, and deciding if viable classes can be constructed. Whether a disposal scheduling or case-by-case authorisation technique is appropriate depends on whether the records are still being produced or will require continuing disposal action, i.e. are not obsolete or overdue for destruction.

Scheduling Subject Correspondence

The difficulties in applying scheduling to subject correspondence have led the PROV to abandon it for this type of material. The pursuit of an orderly categorisation of such records into disposal classes of continuing validity is utopian. It is hugely resource intensive for dubious benefits.

In practice, such information systems are not set up and maintained with the precision and consistency which would make this approach viable. Registry classification systems and filing procedures are not usually applied so consistently that detailed analysis for disposal can be relied upon. These systems are susceptible to the predilections of successive records officers who change the systems over time. Subtle shifts in records classification and filing techniques mean that, even if it were practicable to draw them up, schedules are quickly made out of date.

As general subject correspondence also usually contains a significantly high percentage of records of permanent value, classing of the records requires appraisal of many individual files and the enumeration of a large number of disposal classes. Few savings in storage space and equipment can be achieved because of the relatively small quantities of temporary-value records. The best disposal strategy is based on an initial appraisal which in most cases places the records in the permanent segment and an assessment of whether periodic culling of obviously temporary-value files using the ad hoc destruction authorisation technique is a viable option.

The PROV has developed the ad hoc or case-by-case authorisation technique to considerable effect. In addition to its use in regularly culling complex recordkeeping or general subject correspondence systems, this technique provides an excellent tool in dealing with backlogs of records which are overdue for destruction and therefore require no continuing disposal action.

Scheduling of Simple Recordkeeping Systems

Comprehensive scheduling is much more appropriate to continuing simple recordkeeping systems which typically comprise case files, particular instance papers, transactional and form records, and their associated indexes and registers. For such systems, disposal schedules

can provide a records management tool, a mechanism for assigning archival value, and continuing destruction authorisation.

General Disposal Schedules (GDS) for simple records can potentially provide real value-for-money by authorising disposal of housekeeping or functional records that are common to a number of agencies, targeting segments of our clientele—such as local government, schools and hospitals—or particular functions or information processes common to many agencies, for example licensing, examination and assessment, certification, accounting, and claims processing.

Such disposal schedules, whether general or specific, are most effective when they:

- target easily identifiable classes of records that are still being produced or require continuing disposal action
- are structured in such a way that they are easy to implement
- are presented to the agency as part of a records disposal planning package that is demonstrably cost-effective.

In the Victorian system, responsibility for developing schedules falls largely on government agencies themselves. For the technique to be effective, it is essential that agencies construct workable schedules of continuing application comprising well-defined classes that can be implemented by agency records managers. The PROV's role involves:

- implementing publicity and training programs with courses, seminars and publications designed to educate the compilers of schedules in both good scheduling techniques and our particular requirement and needs
- encouraging agencies to "professionalise" records management
- consulting with agencies during compilation of draft schedules so that development is monitored and the drafting is put back on the rails if it starts to wander.

Training programs are also needed to develop schedule implementation skills in agency staff. When the PROV issues a General Disposal Schedule, workshops are held to promote its use and provide training in implementation.

EXPERIMENTING WITH SCHEDULING AND CLASSING

Over recent years the PROV has been trialing different ways of scheduling, in particular in the development of GDSs and in some tentative approaches to the scheduling of electronic data. In this experimentation there has been a clear trend away from record-specific, system-specific, format-specific or media-specific classing.

Underlying this trend is a view of disposal classes as arbitrary, subjective groupings, within a records system or common to a number of systems, which are judged to be convenient in assigning disposal sentences. They

may or may not follow the physical arrangement of the records or the pattern of recordkeeping systems. Classes can be as broad or as narrow as seems convenient. A single class may include more than one category of document or records provided that a single sentence can be applied to the whole of the class and bearing in mind that very broad classes may make it difficult for the user to match the class with the records.

Increasingly in our scheduling, classes tend to be defined broadly rather than narrowly, and in functional or process-oriented terms. They are constructed on the basis of an analysis of the related function or process, assessments of samples of the records, and consideration of the implications for schedule implementation of the types of systems the records in the class might belong to, legislative provisions, administrative arrangements and agency staff views. Scope notes for each broad class explain the related function or the role of the record in the information process, give examples of specific types of records encompassed by the class, and guide users in its application. Broad classes may be further broken down into sub-classes where it assists schedule users in matching the class with the records.

In developing the recently issued GDS for Examination and Assessment Records, for example, an initial analysis was made of the function—running examinations, assessing candidates and certifying results—and related information process. Records were first broadly classed according to their relationship to the function and role in the information process into three groups—source records providing information on the candidates and their assessment, master records certifying the results, and transactional records mainly concerned with requests for information about assessments, the issue of certificates and so on. The master records were appraised as permanent, most of the other classes within the other two broad categories as temporary. In constructing sub-classes within the broad categories, records were sampled and analysed and recordkeeping systems in place in agencies responsible for conducting examinations, ranging from the Victorian Curriculum and Assessment Board which runs the Victorian Certificate of Education program to universities and colleges, and the Victorian Nursing Council, were assessed to ensure the classes could be applied.

The PROV has also developed new schedule structures supported by extensive cross-referencing between similar and related classes and indexes to guide the user to the right class in the schedule and refer to relationships with other classes. The PROV has had great success in dividing its more complex schedules into a Summary Schedule, listing as briefly as possible the class headings and the sentence for each so that the schedule can be easily skimmed and the structure grasped in overview, in addition to the Full Schedule, which describes each class more fully in scope notes, includes cross references to related, similar or alternative classes, and

specifies exclusions from the class as well as relating it, where appropriate, to legislative provisions. The danger that schedule users will consult only the Summary and ignore the Full Schedule has not proved to be a real problem.

The PROV encourages agencies to modify recordkeeping practices in accordance with approved schedules. Simple examples abound. In our GDS for Public Hospital Patient Records, for example, a distinction is made in sentencing between records relating to adults and children: clearly the basis for filing such records separately or at least identifying them by that categorisation. Many of the records in our GDS for Local Government are duplicated: this meant distinguishing "documents of record" and encouraging municipalities to arrange their recordkeeping accordingly.

DISPOSAL OF ELECTRONIC RECORDS

Approaches to appraisal of electronic data so far have targeted information processing systems likely to contain archivally valuable data. In the resulting disposal schedule the system and the function to which it relates are described. Archivally valuable data is identified and specific provisions are made for its survival—usually in the form of an output from the system. The system design might already provide for this output or we may need to negotiate with the agency a modification of the system to produce an output suited to archival purposes. The output may be in machine-readable form, printout or COM. In some cases we may need to put in place arrangements that ensure preservation of the archival data through successive generations of systems until it is eventually output in a form the archival authority can handle. In such cases the schedule encompasses these arrangements. Provided the requirements ensuring the survival of archival data are met, the schedule authorises continuing disposal action in the form of deletion, amendment, modification and updating for the other data in the system. The onus for keeping temporary data alive in the system for as long as is required for audit, legal and administrative purposes is formally placed on the agency—in particular the system designers—via the schedule. Classing of temporary data is not attempted.

Although such whole-system arrangements appear as part of a disposal schedule for the agency concerned, they seem scarcely to relate to disposal classes in any traditional sense—at least not as long as the mystique of comprehensive classing and scheduling still has us in its thrall. It is already apparent, however, that the technique, first seen as a compromise to meet the special needs of machine-readable records, works quite well and there seems no reason why it could not be applied to scheduling selected paper records. In form, it is, in fact, the first of the two alternative approaches identified earlier:

- identifying records for retention and destroying the remainder.

SECURING COMMITMENT TO DISPOSAL PLANNING

One of the major challenges the PROV faces in selling its disposal planning package is persuading agencies to invest their resources in developing and implementing appropriate disposal arrangements.

The PROV has developed guidelines to ensure that resources, once committed, are put to good use and that the chosen techniques survive the value-for-money test. For example, schedules developed by agencies for paper-based records are only accepted for evaluation by the PROV if they relate to records comprising large simple disposal classes and will enable regular, cost-effective disposal action with demonstrable savings in space and equipment. Case-by-case authorisation is limited to situations in which it is appropriate, where more than 10 shelf metres of records are involved. These guidelines also produce a cost-effective result at the PROV where one officer can appraise up to 12 disposal schedules and process destruction authorisations for up to 5,000 shelf metres per annum.

However, it is much harder to secure commitment of resources in the first place. For the resource-impact factor to bite, systems which provide full cost accountability for records and related resources must be in place.

Agencies will be induced to manage records disposal efficiently if this is seen as contributing to the cost-effective management of their business. Better archives and records management systems, we say, do this. Agencies might be convinced of this by exhortation, demonstration, or persuasion. They might be convinced by example—seeing it work in other agencies. But what more can the archives authority do?

The development here and overseas of mechanisms within government for full cost accounting in the management of records related resources offers, in our view, one possibility. Essentially, the cost of records storage in paper-based systems can be met in one of four ways:

- minimisation of records bulk by destruction, miniaturisation or media substitution
- accommodation on agency premises
- accommodation in commercial storage
- accommodation at the archives authority.

The full economic cost of each of these alternatives has to bear on agency managers, effectively on their budgets, if more active implementation of disposal programs is to be achieved.

In Victoria, resources to implement disposal programs come from agency budgets—except for the resources of the archives authority itself to the extent that it is involved. If agency staff or outside consultants are used

to develop disposal programs and apply them, this also is a direct charge on agency budgets. Setting aside its regulatory and approval role, similar services provided by the archives authority should be funded in the same way—by charging for consultancy services in drawing up disposal plans in full competition with outside consultants for example, and possibly by charging licensing fees for the use of General Disposal Schedules.

Under existing Victorian government accommodation programs, inner budget agencies sometimes do not bear the direct cost of their own accommodation, but it seems more likely than not that increasingly they will. In any case, outer budget agencies do, and all agencies bear directly the cost of storage equipment and using commercial storage.

The logic of this situation is that the final inducement on agencies to attend to their disposal obligations will come when records accommodation for non-permanent records at the archives authority is also charged back to agency budgets at either cost recovery or commercial rates. Only then will the full economic cost of records disposal decisions be part of the resource management thinking of agency managers. By extension, this argument applies to data archiving and storage services, and the treatment of non-paper records generally.

The archives authority can pro-actively affect the response of agencies to disposal needs. If its legislative base is sound, it can regulate the timing of records transfers out of agency custody (e.g. after a maximum of 25 years in accordance with the common 30 year rule). It can prohibit the lodgement of unsentenced or permanent records in commercial storage. It can itself impose penalty rates on storage of unsentenced records in the archival period (e.g. beyond 25 years) and on time-expired records.

In this way, the possibility exists for the development of systems within government—and any large organisation for that matter—that enable the archives program to contribute significantly to the better management of resources while at the same time achieving those objectives—which it has always had—to identify and segregate and thereby preserve and make available the permanently valuable archives.

The PROV has taken its first steps along this path with the introduction of charging in 1989/90 for secondary records storage and retrieval services, and the proposed introduction of a new access policy based on a 30 year rule, recently accepted in principle by the Government of Victoria. In this scenario the disposal schedule takes its proper place in planning for the better management, preservation, and use of government records. Its place is not insignificant; it is one of a variety of tools available to archivists and records managers in undertaking their important work. We also recognise, as no doubt do others, that there is a good deal more to records disposal than writing a disposal schedule.