

## Information Management Advice I8 - Managing records in business systems

### Part 3: Sentencing records in business systems covered by a Disposal Schedule

#### Introduction

*In Part 1: Checklist for Decommissioning Business Systems, the business processes that the system performed and the State records contained in the system were identified. If some or all of these records could be matched against a record class in an authorised Disposal Schedule, the records had disposal coverage. The process of sentencing records in the system according to the relevant Disposal Schedule will be further described here. Agencies can determine the minimum period of time the records must be kept by sentencing the records. Applying sentencing actions will assist agencies to determine the most appropriate management strategy for the records in the business system. Knowing if the State records need to be kept for the short or long term will help agencies to decide on a suitable management/ preservation/ disposal strategy.*

This Advice does not constitute an authority given by the State Archivist to dispose of State records. It is intended to provide additional supporting information to assist agencies in implementing their requirements under the Archives Act 1983.

#### Multiple records where only some are covered by a Disposal Schedule

If those records which are covered by a Disposal Schedule cannot be separated and extracted from the system, the agency should follow the process for records that are not covered by a Disposal Schedule, and not the process covered here.

If some of the records have disposal coverage, and the business system is technically capable of extracting individual records or subsets of records (and all associated metadata), the agency may choose to sentence only these records under the relevant Disposal Schedule. However, before the business system can be decommissioned the remaining records in the system will still need to be appraised.

The process for appraising records that are not covered by a Disposal Schedule is introduced in *Part 1: Checklist for Decommissioning Business Systems*, and covered in detail in *Part 4: Appraisal of records in business systems not covered by a Disposal Schedule*, available as part of this Advice.

## 1. Implementation approach

Agencies have the choice of sentencing and disposing of State records at the individual record level or at the system level (that is, retaining all the records for the same length of time or disposing of the short-term value records as their minimum retention periods expire).

When applying an approved Disposal Schedule to the records in the business system, the agency will need to consider whether it is optimal to:

- Retain records in the business system until the minimum retention period for all records expire
- Dispose of individual records as they become eligible, or
- Apply for early disposal authorisation for eligible short-term value records.

Agencies may decide that sentencing at the individual record level rather than at system level may be impractical as it is more time consuming.

However, there are a number of factors which will have a bearing on the implementation approach - how much record retention periods vary in the system, the volume of records, and availability of staff resources - all these factors will shape the approach.

## 2. Factors which may influence the agency's sentencing approach

### ***Retention requirements - Do they vary greatly or are they very similar?***

Where retention periods of the records vary greatly but the agency wishes to dispose of all records at the same time, the agency **MUST** apply the longest retention period to records within the system, and retain until this records retention period has passed. Note: TAHO will not accept TEMPORARY records for transfer, so if the agency chooses this approach, all PERMANENT records will still need to be sentenced separately and separated (exported) for transfer to TAHO.

Agencies may choose to dispose each of the records in the system as they become eligible for disposal. This approach to sentencing the records would reduce the total volume of data in the system. Using the example shown in Figure 1, a significant portion of the records in the system would be eligible for disposal within 7 years after the account has been finalised, and the remainder 100 years after the last action. If the system is inactive (i.e. no new records have been added for some time), the proportion of records which are eligible for immediate disposal may be quite high, making this approach the most cost effective.

### ***Can the different records be identified and generated as a report?***

To enable disposal of records as they become eligible, or the migration of only those records which require ongoing retention, it must be possible to identify and isolate individual records (e.g. the data fields which make up the records and then generate and extract the records). In some cases, the records may be able to be generated as a report.

Systems which have well defined metadata will be more suited for this approach than systems with poor or minimal metadata. If the complexity of the system's data structure is such that the process of identifying and detangling individual records may risk the integrity of the records and lead to unlawful disposal, this approach is not recommended.

### ***System capability - is it possible to extract the records?***

To enable disposal of records as they become eligible or migration of enduring or high value records which require ongoing retention, the system must be technically capable of extracting individual records or subsets of records, including all associated metadata. If it is possible to extract records from the system, care needs to be taken to ensure that:

- Records (or the associated metadata) are not left behind or deleted when they need to be retained
- Accessibility and usability of the records is maintained
- Meaning is not lost (data without relationships may be rendered meaningless)
- Community expectations are met (for example, there might be expectations around system functionality/useability and not just the existence of data).

### ***Volume - Is there a large quantity of records to manage?***

Another factor which may influence the agency's approach is the volume of records in the system. The larger the volume of records, the more cost effective it might be to implement periodic disposal. However, in most cases, from an efficiency perspective, this factor alone will not prejudice one approach over the other. For example, how easily records can be identified will also need to be taken into account.

### ***Cost and resourcing***

Does the agency have the staff to undertake the sentencing of the records? Can the agency afford to outsource the sentencing? These are also factors which will impact on an agency's approach to sentencing the records in business systems earmarked for decommissioning.

## **3. Sentencing principles**

During the process covered in *Part 1: Checklist for Decommissioning Business Systems*, agencies may have found that the records in the system were covered by several record classes. These classes often do not have the same retention period.

***If sentencing at the system level, you must apply the longest retention period.*** Where records are covered by more than one record class and those record classes have different retention periods, the records must be retained for the longest retention period.

In the example scenario shown in **Figure 1**, two classes have been identified as applicable to the records maintained in the agency business system. These classes have retention periods varying from 7 years after last action to 100 years after last action. If the agency wanted to sentence at the system level, the records in the business system would need to be retained for a minimum of 100 years after the last client account action, even though some records may be eligible for disposal after only 7 years.

**Figure 1: Example record disposal classes and disposal actions**

Reference	Disposal Class	Status and Disposal Action
01.00.00	<p><b>COLLECTION AND ENFORCEMENT</b></p> <p>The function of collecting and enforcing monetary penalties imposed by courts and various statutory authorities. Includes processing incoming payments, payment variations, debt withdrawals, account enquiries, forwarding monies to creditors and the imposition of enforcement sanctions against enforcement debtors in default.</p> <p>Includes the development and review of legislation and reporting to government.</p>	
01.01.00	<p><b>Client Accounts</b></p> <p>The activities involved in the management of client accounts electronically stored in the database including financial transactions, entity identification records, contact details, audit records, documents and notifications generated by the database and notes.</p>	
01.01.01	<p>Records relating to an account with no outstanding debt contained in the Fines and Infringement Notices Database (FIND). Includes financial transactions, entity identification records, contact details, audit records, documents and notifications generated by the database and notes.</p>	<p>TEMPORARY Destroy 7 years after date of finalisation.</p>
01.01.02	<p>Records relating to an account with outstanding debt contained in the Fines and Infringement Notices Database (FIND). Includes financial transactions, entity identification records, contact details, audit records, documents and notifications generated by the database and notes.</p>	<p>TEMPORARY destroy 100 years after last action.</p>

Example from DA 2122

**Calculating minimum retention periods using Disposal Actions**

Figure 1 shows two separate records disposal classes. Each disposal class prescribes a disposal action for the records. The disposal action is made up of a fixed retention period (for example, 7 years) AND a disposal trigger from which point the retention period begins (for example, ‘after date of finalisation’).

The records in the business system under the Client Accounts record class 01.01.01 would become eligible for disposal based on the following calculation:

***Date on which disposal trigger event occurred + fixed retention period= Minimum retention period***

If the business system logs client account finalisation dates, then the calculation is easy to make, because the finalisation date for each client account becomes the disposal trigger event. For example, client accounts finalised in 2011 would become eligible for disposal in 2018 (2011 + 7= 2018).

### **Last Action**

The records disposal class 01.01.02 in Figure 1 has a retention period of 100 years, and a disposal trigger event 'after last action'. Last action is a common trigger event which appears in many Disposal Schedules. It refers to the last action that occurred as part of the business process which is documented in the records in the business system. It is not the last time the data was accessed. In most cases the "date last modified" can be used as the date of last action.

### **Sentencing at the system level or the record level using disposal triggers**

If the records in the system are all covered by the same record class but will reach their minimum retention period at different times, rather than disposing of individual records as they become eligible, agencies should retain all the records until the most recent records (i.e. the newest records) expire.

Irrespective of whether the agency chooses to dispose of records at the whole of system level or at individual record level, when determining the minimum retention period, a true and reliable disposal trigger event date is critical. Determining whether or not a disposal trigger event has occurred may be problematic where this date was never recorded in the business system.

In such cases, the agency will need to decide on a meaningful and reliable date which can be used as a consistent point of reference as the last action for a business process – for example, last modified date or date of last entry in the system. If the 'date created' is used and the records have been previously migrated or imported into the business system from another system, be sure to check that all record creation dates are true creation dates, and not the date of migration/import.

### **Identifying records likely to be required in judicial proceedings**

Refer to *Advice 29 - Advice for Agencies on Managing Legacy Records* for more information about identifying records likely to be required in judicial proceedings.

## **Next steps**

Records which have already met the minimum retention periods defined in the Disposal Schedule and are not required for any further business or legal purposes, may be disposed of in accordance with *Advice 9 - Disposal of Scheduled Records*. For advice on the destruction of digital records please refer to *Guideline 21 – Approved destruction methods for State records*.

For those records which have not yet met their minimum retention period but have less than 5 years remaining before the records would be eligible for disposal, the agency may apply for early disposal authorisation (see *Advice 10 - Disposal of Unscheduled Records*). If early disposal authorisation is granted by the State Archivist, these records can be disposed of.

All other records need to be retained in the business system or preserved in a managed recordkeeping environment until their retention period has expired.

## Recommended Reading

- Guideline 2 - Retention and Disposal of State Records
- Guideline 21 - Approved destruction methods for State records
- Advice 9 - Disposal of Scheduled Records and Form AOT 48 - Application to Dispose of State Records
- TAHO Advice 29 - Advice for Agencies on Managing Legacy Records

See the *Government Recordkeeping website for Retention and Disposal Schedules*

## Further Advice

For more detailed advice, please contact:

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- Queensland State Archives Fact Sheet: Sentencing records in business systems (2013)

## Information Security Classification

This document has been security classified using the Tasmanian Government Information Security classification standard as PUBLIC and will be managed according to the requirements of the Tasmanian Government Information Security Policy.

## Document Development History

### Build Status

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### Amendments in this Release

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		<i>This is the first release of this document.</i>

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