



Records Management Advice

Developing a Retention and Disposal Authority for State Government Organisations

1. Introduction

Under sections 11 and 16 of the *State Records Act 2000* all State organisations must have a Record Keeping Plan (RKP), which among other matters must set out:

- the government records that will be State archives (kept permanently)
- the retention period for those government records that are not State archives

For State government organisations, most records will be covered by the General Retention and Disposal Authority for State Government Information (GRDA).

The GRDA is a mix of both functions and activities at the top level.

- Functions represent the major responsibilities that are managed by an organisation, for example INFORMATION MANAGEMENT.
- Activities are the processes or operations that make up the business function, ADVICE, MEETINGS, PLANNING and so on.

For example:

• ADVICE	- Activity
• AGREEMENTS	- Activity
• ASSET MANAGEMENT	- Function

This mix of functions and activities at top level means you don't have to list the activities under each function like in your Business Classification Scheme (BCS).

This also allows activities to be used independently of function.

Where you would have the following in your organisation's BCS or file listing

- FORENSIC SERVICES – Advice
- WILDLIFE MANAGEMENT – Advice
- STUDENT ADMINISTRATION – ENROLMENTS -- Advice

These records would all be covered by ADVICE in the GRDA, and the records would be classed as significant ADVICE or other ADVICE (routine) depending on their importance.

2. Developing your retention and disposal authority

Where the organisation creates or captures records that are not covered by the GRDA, they will be required to develop a Retention and Disposal Authority (RDA) to manage those records.

An organisation's RDA, together with the GRDA, is intended to

- identify all the information held by the organisation, in any format
- specify the minimum time the information must be retained before it can be legally destroyed
- identify which records must be kept as State archives
- identify those State archives that will be restricted access archives.

Your RDA will need to be reviewed every five years along with your RKP, or, if your functions change.

2.1 Structure

An RDA is structured according to function and record class. Each class has a disposal action which includes a trigger.

The trigger is the point at which the retention period starts; for example, After last action, Date of birth.

For example:

Function/Activity	Description	Disposal Action
WASTE MANAGEMENT	Matters relating to waste management.	
Significant	Records of significant waste management services, including locations of special use sites.	Required as State archives
	Records relating to the collection, transport, processing or disposal, managing and monitoring of asbestos or hazardous waste materials.	Retain 100 years after action completed, then Destroy.
Other	Records relating to the collection, transport, processing or disposal, managing and monitoring of waste materials.	Retain 7 years after action completed, then Destroy.

Functions and activities, can generally be classed as 'significant' or 'other' (routine) and in an RDA are separated into different classes, as can be seen from the above example.

2.2 System

Your RDA will be completed using the State Records Office's (SRO) Online Recordkeeping and Disposal Application (ORDA). Instructions for access, using, and links to ORDA can be found on our website at <https://www.wa.gov.au/organisation/state-records-office-of-western-australia/developing-retention-and-disposal-authority>

3. Where do I start?

When developing an RDA, it is important to identify all the information your organisation creates or receives in the conduct of its business. Examine the main functions of your organisation, the regulatory environment, relationships with other organisations, the main stakeholders, and interactions with the community.

Your organisation should have an information asset register which contains a listing of all the organisation's business information in a single source. Have a look at your annual report and website for all the business activities and functions your organisation is involved with.

3.1 What's already covered?

The next step is to look at the GRDA published by the State Records Office. The GRDA covers administrative records that are common across government

organisations. It contains a mix of functions and activities allowing you to use the same disposal class for more than one function.

Identify the business functions that are exclusive to your organisation. These functions will form the basis of your RDA.

Functions and activities covered in the GRDA **must not** be repeated in your organisation's RDA.

For example:

- ◀  2. BRIDGE ASSET MANAGEMENT
 - ▶  2.1. Design
 - ▶  2.2. Inspections
 - ▶  2.3. Maintenance

BRIDGE ASSET MANAGEMENT is just a type of ASSET MANAGEMENT; therefore, you should use ASSET MANAGEMENT as described in the GRDA.

Ask yourself if the activities listed under each function are already covered in the GRDA and if the descriptions cover your records sufficiently.

For example:

- Design is covered under CONSTRUCTION / CAPITAL WORKS in the GRDA.
- Inspections and Maintenance are also listed in the GRDA under their respective headings, INSPECTIONS and MAINTENANCE.

Therefore, they should **not** be included in your organisation's RDA.

3.2 The relationship between your BCS and RDA

Your RDA should not replicate your organisation's Business Classification Scheme; it need not be a one-to-one relationship.

For example, your organisation's file titling may look like:

- SECURITY - FEES – 2022-2024
- RECREATIONAL FISHING - Fees - Abalone – 2022-23
- PEST MANAGEMENT – Chemical spraying – Fees – 2024-25

These examples are covered by the GRDA under FEES AND CHARGES – Other, and retained for 6 years after successful audit, then destroyed.

Don't be overly specific in your class descriptions as this limits your ability to use the class more broadly.

For example, **USE**

Function/Activity	Description	Disposal Action
PEST MANAGEMENT	Records relating to the management and control of pests.	Retain 7 years after action completed, then Destroy.

NOT

Function/Activity	Description	Disposal Action
PEST MANAGEMENT	Records relating to the management of crabgrass, onion grass and crowsfoot.	Retain 7 years after action completed, then Destroy.
	Records relating to the identification and control of feral foxes in non-urban conservation land managed by the department.	Retain 7 years after action completed, then Destroy.

3.3 What if my core functions are in the GRDA?

If your organisation's **core** functions are in the GRDA, you may list them in your RDA and include a 'see' note to the GRDA, for example:

Function/Activity	Description	Disposal Action
CLAIMS MANAGEMENT	Records relating to the management of claims, including: <ul style="list-style-type: none">• Motor vehicle• Indemnity... <i>See General Retention and Disposal Authority for State Government Information CLAIMS</i>	

If the function is covered by the GRDA but you have records with a different retention period which is not listed, check first to see if that retention is necessary. If it is, you can add it in the following manner:

CLAIMS MANAGEMENT	Records relating to the management of claims, including: <ul style="list-style-type: none">• Motor vehicle• Indemnity...	
--------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------	--

	<p>See also <i>General Retention and Disposal Authority for State Government Information CLAIMS</i> for classes of records not listed here.</p>	
	<p>Claims for breach of a minor's rights whilst in custody.</p>	<p>Retain 7 years after child turns 18 (reaches age of majority) or 7 years after death, then Destroy.</p>

It's best **NOT** to use the GRDA reference number associated with the function/activity as this may change in future versions of the GRDA.

4. Identify retention periods

Once you have identified the unique functions of your organisation, you can then determine how long that information needs to be retained.

The minimum retention period for records of information is based on the:

- administrative value
- regulatory requirements
- historical and community value of the information.

4.1 Administrative value

Administrative information is used in the day-to-day operations of your organisation. Consult with the individual business units to gain an understanding of what records are collected or created and how they are used.

For example: a recreational fishing licence.

Information may be collected by the finance section along with a payment. The licence may be of no further use to finance once the payment has been processed. However, that same licence may then be useful to inspectors when checking bag and size limits or accessed by customer service if a complaint is made about illegal fishing.

The use of the information will help determine what retention period would be appropriate.

4.2 Regulatory requirements

Your organisation's legislation and/or accompanying regulations may contain requirements for the keeping of records; what should be kept, how it should be kept, and for how long.

For example:

- The *Cemeteries Act 1986* states that the Board must keep a register of the location of all burials and that the register must remain in its original format.
- Under the *Work Health and Safety General Regulations 2022*, health monitoring records must be kept for 30 years after the record is made. They must also be kept confidential.

When developing your RDA, it is useful to include information about any specific legislative requirement for retention in the description field. This makes it easier for you to review the RDA at a later date.

For example:

Function/Activity	Description	Disposal Action
LIVESTOCK	Stock movement <i>Biosecurity and Agriculture Management (Identification and Movement of Stock and Apiaries) Regulations 2013</i> s. 196	Retain 7 years after action completed then Destroy.

Check your Annual Report or RKP to identify which legislation affects your organisation.

4.3 Historical and community value

Historical records are generally of interest to a wider audience than the original creating organisation, including future generations. These records may be State archives' i.e. to be retained in perpetuity.

5. Applying retention periods

A good method to start working out retention periods is to divide your information into the following categories:

- State archives – permanent
- temporary - records that can be destroyed once they have met their legislative, business or community requirements.

For ease of developing an RDA, temporary records may be further subdivided into 4 categories:

- long term - (20 years +)
- medium term - (7-20 years)
- short term - (<7 years)
- ephemeral

5.1 State archives

State archives (records to be retained permanently) must be identified in a RDA. State archives generally have one or more of the following attributes.

1. Records that provide evidence of the source of authority, foundation and machinery of government. Includes State records that define the function of government, such as the nature and extent of government jurisdiction, obligations and powers.
2. Records that provide concise evidence of the deliberations, decisions and actions of Western Australian government relating to key functions and programs and significant issues faced in governing the State.
3. Records that provide evidence of the legal status and fundamental rights and entitlements of individuals and groups essential for ongoing functions of the State.
4. Records with a special capacity to illustrate the condition and status of Western Australia and its people, the impact of government activities and the interaction of people with the government.
5. Records containing information that is considered essential for the protection and future well-being of Western Australians and their environment.
6. Records that have a substantial capacity to enrich the knowledge and understanding of aspects of the State's history, society, culture, and people.

Where you have determined that a record is a State archive in your organisation's RDA, the appropriate justification must be added from the drop-down list within ORDA, as shown below:

Disposal
Action
Retain as State archives
Archival Justification
Justification
4. Records with a special capacity to illustrate the condition and status of Western Australia and its people, the impact of government activities and the interaction of people with the government.

5.2 Temporary records

All temporary records must be maintained for a specific period of time. This may be required by legislation, including regulations and standards, or specific organisational

directives. It is important to remember that the retention period for temporary records should be the minimum period only. Organisations may choose to keep records for longer than the minimum period if it is considered necessary for business requirements.

5.2.1 Long term records (20 years +)

These records may relate to long-term or ongoing rights, obligations and entitlements. The records generally need to be retained for the life of the individual or asset they relate to.

In some cases, the records may document events or activities where the impact of the event may be unknown for some time.

Long term records can include:

- health monitoring
- records that have the potential to be used in future child sexual abuse cases.

5.2.2 Medium term records (7-20 years)

The category generally consists of records required to meet statutory limitations or audit purposes.

Medium term records can include:

- licensing and applications
- accreditation
- minor contracts
- general administrative procedures.

5.2.3 Short term records (<7 years)

These records are only needed for a short period of time where the decision or action they relate to can be appealed, questioned, or reviewed. They may also need to be kept until superseded or revoked.

Short term records can include:

- advice which has no legal significance
- applications which are refused or not proceeded with.

5.2.4 Ephemeral records

These are records that are only needed for a few days or hours and have no ongoing administrative, legal, evidential, fiscal, cultural or historic value.

Ephemeral records can include:

- duplicates
- reference sets of documents

- unsolicited or promotional materials from external sources
- rough drafts containing no significant changes
- circulars from external sources.

NOTE: Ephemeral records do not need to be listed in your RDA.

5.3 Retain in organisation

Records classed as Retain in Organisation in your RDA, are **NOT** State archives. These are simply records that your organisation has deemed necessary to be retained in-house for the life of the organisation for ongoing administrative or reference purposes.

The use of Retain in Organisation should be kept to a minimum.

5.4. Disposal triggers

A disposal trigger is an event or action that must occur so that the retention period commences.

The most common triggers include:

- date record created
- date action completed
- after successful audit

When creating your RDA in ORDA, choose a suitable disposal trigger from the drop-down list.

Edit Disposal Condition

Retention Period	25	years
Disposal Trigger	action completed	
Disposal Action	<input type="checkbox"/> action completed <input type="checkbox"/> appointment <input type="checkbox"/> as State archive <input type="checkbox"/> created <input type="checkbox"/> date of birth <input type="checkbox"/> date of death <input type="checkbox"/> reference use ceases <input type="checkbox"/> successful audit <input type="checkbox"/> successful audit, or 7 years after action completed, whichever is later	
	Save	Cancel

5.5 In summary

As a general guide:

- Most routine or administrative functions are ‘Retain for 7 years after last action and then destroy’.
- Routine or administrative functions that are not proceeded with are ‘Retain for 2 years after last action and then destroy’.
- Records related to finance are ‘Retain for 6 years after last successful audit and then destroy’.

Helpful Hint: Do not use too many different retention periods under a Function, as fewer classes make it simpler to use and manage into the future.

6. What if I don’t know what retention period to apply?

ORDA holds most organisation’s approved RDAs and allows users to search RDAs and SDAs for precedents. If you are unsure about a retention period, you can do a search in ORDA and see if any other organisations hold similar information and what retention period has been used.

Open ORDA and use the Search tab. In the Keyword box, enter information required, or you can search for an organisation, sector or the title of an RDA.

DA Title

Organisations

Sector

Search for a Precedent

Keyword

Search In

Term/Class Title And Description

Search

Clear

7. Restricted Access archives

Public access to certain State archives may be restricted for a defined period of time. For most WA government organisations, these restrictions on access must be approved by the State Records Commission through the process of approving record keeping plans and RDAs. Restrictions on access may be considered on the basis that these records contain confidential, personal and/or sensitive information’.

Check to see if any of the records you have tagged as State archives also have a restricted access period. Have a look at the information on the SRO’s Restricted State Archives webpage at <https://www.wa.gov.au/organisation/state-records-office->

[of-western-australia/restricted-state-archives](#) and then add this information to your RDA in ORDA under the Optional Elements section.

- Optional Elements		
Restricted Access Notes		
Justification	Description	Add
Restricted access archive (State Records Act 2000, Section 49).	Records containing medical information, access restricted for 100 years	Edit Delete

Make sure to check your organisation's relevant legislation to see if any other archives may have restrictions on them.

8. Legacy records

Legacy records are for functions which are no longer carried out by the organisation, or which the organisation has custody of from a preceding organisation.

Unless already covered in an approved ad hoc disposal authority, legacy records still in the custody of the organisation should be included in the RDA.

9. Databases

Do not list your databases in the RDA, these should be listed in your RKP under Business Information Systems.

If you wish to note that certain information is held within a specific system you can add the name/s of the systems to the Description field.

For example:

Function/Activity	Description	Disposal Action
Cargo Management	Cargo or vessel manifests. <i>All records stored in Cargo-Ship Tracker (CST)</i>	Retain 7 years after action completed then Destroy.

10. Websites

Do not include Websites in your organisation's RDA. The records / information published on your website must be captured with the main subject or functional area to which the information relates.