

APPENDIX THREE RETENTION AND DISPOSAL SCHEDULE – IMPLEMENTATION GUIDELINES FOR NSU PROVIDERS

National Screening Unit

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1 What is a retention and disposal schedule?

A retention and disposal schedule identifies classes of records with similar retention and disposal requirements.

It enables retention decisions to be made quickly over a range of records, reducing the need for appraisal of each individual record series, and assisting in the efficient management of records once they have become non-current.

Retention periods and disposal decisions only become effective once the record is non-current.

A retention and disposal schedule is also the mechanism by which the Chief Archivist provides ongoing approval for the disposal of records covered by the Public Records Act 2005, which includes all records of NSU, including those created by providers in carrying out contracted services.

2 What provider records are covered by the schedule?

This schedule applies to all records in any format pertaining to supply of services provided to NSU by a provider - whether current, non-current or yet to be created. It covers:

- Paper records
- Electronic documents
- Electronic records in databases
- Screening records, including X-rays and films

It covers records of all formats and age that are created and received by providers in carrying out services as contracted by NSU.

The retention and disposal schedule includes the records created as part of all screening processes, but excludes the actual human tissue and blood samples gathered during such processes. It also currently excludes disposal authority for the Blood Spot or "Guthrie" cards.

3 Terms used in the schedule

What is meant by Disposal?

Disposal (or disposition) is a decision. It does not mean destruction - it is the final decision made by NSU and Archives New Zealand about the permanent preservation or otherwise of the record. Two disposal actions are listed within the NSU schedule. They are:

A - Retain as Public Archive	Transfer to Archives New Zealand custody at end of the retention period
D - Destroy	Do not transfer to Archives New Zealand. Destroy records in an approved manner at the end of the retention period

What is the Retention period?

Retention period is the period of time between the record becoming non-current and the action of the final disposal either, destruction, transfer to Archives New Zealand, or retain by NSU until it is no longer required.

Some records have legal requirements for retention. Some of those legal requirements may be specific to NSU; others are generic to government departments or all organisations.

Retention periods and disposal decisions only apply to **closed or non-current** records; therefore the schedule should only be applied to **closed or non-current** records.

Many of the records created/received by NSU are of a detailed nature and consist of medical information pertaining to individuals. They are of high operational value to NSU over long periods of time, but are not necessarily of archival value (such as an individuals cervical screening results). The standard, destroy (D) and archive (A) disposal actions are used within this disposal authority. However in recognition that many of the records identified for destruction are of high value to NSU over long periods of time some classes have the further statement of "May be destroyed when all business, administrative, research and legal use ceases" to signify that NSU will be retaining the records long term.

This means that once records identified with the destroy extension have met the minimum retention period outlined in the schedule, NSU will further assess the records to determine if they should be retained longer prior to their disposal. This ensures that NSU determines internally when such records are of no further administrative or operational use, yet also covers the privacy principle that records containing information about identifiable individuals should be retained for no longer than the purposes for which they were gathered. After such time, the records would then be destroyed.

It should be noted that the retention periods stated in the retention and disposal schedule are **minimum** retention periods only. If providers or NSU wishes/needs to retain records for longer than the retention period listed they are at liberty to do so. Records must be retained for **at least as long** as the stated retention period. Disposal prior to that date would contravene the disposal authority and permission given by the Chief Archivist.

When is a record closed or non-current?

There are different events (triggers) that determine when records become closed or non-current – both electronic and hard copy.

Inactive files are not closed, and the schedule should not be applied to them until the file has been closed.

Record triggers

The following triggers appear within the retention and disposal schedule as the times from which the retention period begins:

- **Date of last action** refers to the date that an item was added to the paper file and/or electronic folder. It does not include retrievals, e.g. a user viewing a document, or retrieving a physical file from storage where nothing else is added to the record
- **Date from when provider ceases to be actively engaged/contracted to NSU** refers to when NSU and the provider stop having a contractual relationship (for whatever reason)
- **Date of request** refers to the date the actual request for screening services is made
- **Date of last treatment** refers to the date when the patient last received any form of screening treatment/activity as part of a particular programme
- **Date of sample** refers to the date on which the sample was taken
- **End of financial year** refers to the end of the financial year in which the records were created
- **Date when participant seeks withdrawal** from the programme applies only to those who withdraw from the National Cervical Screening Programme and it is the date on which the request for withdrawal was received
- **Date from when data is entered into the NCSP register** refers to the date of data entry of individuals results/data into the Register pertaining to participants in the National Cervical Screening Programme
- **When system becomes inactive** refers to the date when a business information system or database ceases to be actively used – often when it has been replaced

4 What is the format of the schedule?

Fields in the schedule

The table below describes the fields used in the retention and disposal schedule spreadsheet.

Field	Description
ID	Unique identifier for each class of the schedule
Record Class Description	High level class title and sub-class titles and descriptions
Examples of Records	Provides examples and descriptions of types of records covered by the class and specific sub-classes. <i>Note: examples given are not an exhaustive list of records</i>
Total Retention Period	The total period of time from when the record becomes non-current until the disposal action
Trigger	The point at which the record is considered to be non-current. Examples of the trigger point have been provided to assist NSU staff in interpretation and implementation of the schedule
Disposal Action	The disposal action for records in the class or sub-class. Three disposal actions are listed: A – Retain as Public Archive D – Destroy
Criteria and/or Disposal Authority Reference	To provide a cross reference to the disposal criteria outlined in this report, or a reference to classes from Archives New Zealand GDAs that are also applicable.

It is important that the NSU Retention and Disposal Schedule should be the first point of reference as it contains NSU-specific decisions and examples. The Schedule excludes corporate records because they should be covered by the retention and disposal policies within your organisation and they are not NSU records.

Steps for implementing the schedule

Archives New Zealand have released a mandatory disposal standard which must be complied with when disposing of any public records. It can be found at:

<http://archives.govt.nz/disposal-standard>

The following steps should be undertaken when implementing the schedule:

Step One: Identify appropriate code or function

When wishing to implement the retention and disposal schedule on a group of records you must first ascertain what function they belong to so that you can determine which class within the schedule to apply.

If you cannot find an appropriate function or activity, please contact your NSU Performance Manager in the first instance.

Step Two: Determine whether records are ready for destruction, or transfer to Archives New Zealand

If records are to be destroyed, are they eligible for destruction at this date? Note that the date should be taken from the triggers set out in the Table above.

If the records are to be transferred to Archives New Zealand, check to see whether it has been 10 years since the date of the last action on file.

Check the schedule to see what period of time NSU or the provider must retain the records before transferring them to Archives New Zealand.

Step Three: Obtain Internal NSU Approval to Implement Disposal Decisions

Records marked for destruction should be offered for review by appropriate management staff within the provider organisation. A list of those records that are to be destroyed must then be sent electronically (using the attached destruction list template) to NSU for approval **prior to any records being destroyed**. For approval requests please contact your NSU Performance Manager in the first instance.

The lists will be checked to ensure that the correct information has been captured (as NSU are required by Archives new Zealand to retain lists of all records destroyed under this disposal authority) and to ensure that correct interpretation of the disposal actions and time periods has been made.

If staff do wish to keep a record listed for destruction after the retention period is complete, then a new destruction date should be negotiated and physical file cover and file list or database amended accordingly.

Note, retain does not mean transfer to Archives but rather NSU who will retain the record.

Step Four: Carry out the Disposal Action on Eligible Records

SEE section 6 below for instructions about destruction of eligible records

SEE section 7 below for instructions about transfer of eligible records

5 Destruction of Eligible Records

Destruction lists and paperwork

Archives New Zealand requires that every public office must keep reports of records that have been destroyed. Such reports must at least include the following:

- a description of the records sufficient for internal audit purposes
- the date the disposal action took place
- the authority governing the records' disposal
- the person/role undertaking the disposal
- the person/role approving the disposal.

In addition it is recommended that detailed lists of the actual records destroyed (typically to file or folder level) is created and retained by NSU to ensure full transparency and accountability of destruction processes. Lists/reports of records to be destroyed do not need to be in any particular format. However, they must clearly show the following:

- Disposal class from the NSU RDS or the GDA being applied
- File reference (and part number if physical file)
- File Title
- Series and sub-series where appropriate
- Date first document (year is sufficient)
- Date last document (year is sufficient)
- Date closed (date file made inactive)
- DA Reference (Archives New Zealand reference)
- Date of destruction
- Authorising Officer

Once approved records have actually been destroyed a copy of the list must be sent to NSU. This becomes a vital record, because it is evidence of what records have been destroyed and when they were destroyed.

Methods of destruction

Records must be destroyed by either personal supervision or a contractual agreement with a specialist destruction organisation.

The most typical forms of destruction of physical records are burning or shredding.

DO NOT destroy records by including them in office rubbish removal or simply placing them in paper recycling bins.

Refer to Archives New Zealand publication, F9 Fact Sheet: Methods of Destruction.
<http://www.archives.govt.nz/continuum/documents/publications/factsheets/f9.php>

6 Transferring Eligible Records

Method of transfer of Physical Files

Records for permanent retention as archives must be identified and packed for transfer to NSU. Who will in turn pack them in Archives New Zealand boxes ready for transfer.

Note: it is not expected that Providers will create any records that require permanent retention by Archives New Zealand. If however clarification is needed please contact NSU.

Method of transfer of electronic records

At the time of writing this guideline the method of transfer has yet to be determined, as Archives New Zealand is revising its transfer standards for electronic records as part of the establishment of a digital archive.

Note: it is not expected that Providers will create any records that require permanent retention by Archives New Zealand. If however clarification is needed please contact NSU.

7 Relationship between NSU Records and Other Provider Records

The assumption is that for ease of access and use all records created by a provider in carrying out services for NSU have been managed and maintained separately. This should enable easy identification of records due for disposal.

If however, records created as part of the provision of NSU services have not been identified and kept within discrete series/systems then the provider must ensure that no NSU records are disposed of prior to the disposal time periods identified within the retention and disposal schedules.

For providers that are DHBs please note that the disposal time periods within the NSU retention and disposal schedule are consistent with those listed in the DHB General Disposal authority which covers all DHB records.

For providers that are private sector organisations the NSU retention and disposal schedule applies to NSU records only, not to your own business records.

8 Changes to the Filing System and the Schedule

As the records systems evolve and change, additions and alterations to the schedule are inevitable. New classes of series may be needed where no appropriate class exists in the current schedule or the nature of some records may change, which will affect their disposition.

The schedule once signed is legal authority for the destruction or transfer of records to Archives New Zealand, and it must be applied as agreed between the NSU and Archives New Zealand. Any additions to or alterations of classes, changes to retention periods, disposal criteria and restrictions on access must be approved by the Chief Archivist.

9 Who to Contact for Assistance

For assistance and enquiries relating to the Retention and Disposal Schedule its interpretation, application or implementation please contact your NSU Portfolio Manager.

