Clearing Out Legacy Paper Records

For whom is this guidance intended?

This guidance is intended for any member of University staff who needs to clear out a sizeable collection of old paper records, such as a cupboard or a room full of records. It is a practical step-by-step guide to how to approach the task, including shortcuts and issues to consider when deciding whether or not to throw the records away. If you are dealing with only a small set of records, you can work more informally than is recommended here, but the basic approach will remain the same. Annex D contains a shortened version of this guidance intended for staff who are only dealing with a small amount of records, for example, the contents of one filing cabinet.

Guidance on how to deal with electronic legacy records will be issued later in the year; although the principles and considerations are the same, the technique is different because of the different physical format.

What are legacy paper records?

Legacy paper records are 'old' files or collections of papers, created under filing schemes that are no longer used, or with no apparent organisation. They can be cupboards or rooms full of files or papers and in many cases you may have little knowledge of their contents and importance. Often, people have inherited these collections from their predecessor in post or from predecessor organisations.

Whose responsibility is it to clear out legacy paper records?

Legacy paper records are the responsibility of the business area that is holding them.

Why should I clear out my legacy paper records?

The only reason for keeping records is so that the information contained in them can be retrieved, whether for operational reasons or because the records have a long-term research value. If you have a collection of records, but do not have an accurate overview of the information it contains, then there is little purpose to keeping the records. Unwanted legacy paper records are taking up space that could be used more effectively, or, in extreme cases, could be released to Estates and Buildings.

Under the Freedom of Information (Scotland) Act 2002 and data protection legislation, people have the right to ask for copies of information held by the University, regardless of whether this information is in current systems or in legacy collections. Information held in legacy collections will be expensive to locate and retrieve, and these costs cannot be passed on to the enquirer. Therefore, it is in our interest to improve our management of legacy records so that we do not have to spend time searching through old files and papers to respond to requests for information.

How do I go about clearing out a collection of legacy records?

Examining individual files or individual pieces of paper is an expensive and time-consuming process. Therefore, this should only be done as a last resort, after a

number of other techniques have been used to reduce the volume of records concerned.

When clearing out old records, the aim is to identify those records that should be offered to the University Archives, to dispose of those records that are no longer required, and to identify those records still required for business reasons and to integrate them into the current recordkeeping systems.

This section provides step-by-step instructions for clearing out a large collection of old records.

1.   Background research

The first step should be to find out the background to the records.

Without looking at the records themselves, try to answer the following questions:

Who created these records?
-    What business area(s) were they from?
-    What were their responsibilities?
    If you cannot answer these two questions, do you know:
-    What were their name(s)?
-    What job(s) did they do?

What are the records about?
Are there any existing filing schemes, indexes, lists or catalogues for the records?
Are the records still used?
-    One way of assessing this may be to lock the door of the room, the cupboard or the filing cabinet in which they are held, put a sign on the door telling people where the key can be obtained, and see how many people ask for it. If the records are still used, integrate them into existing systems and develop a retention schedule for them.

Do these records have a relationship with any other records held by the University, possibly in another business area or the University Archives?
-    Are they the predecessor of a current set of records?
        If yes, perhaps the current records have a retention schedule that you can also apply to these records.
-    Are they used in conjunction with another set of records?
        If yes, consider the two sets of records together.
-    Are they the continuation of a series of records already held elsewhere?
        If yes, apply the same disposal criteria to both sets of records.
-    Are they a duplicate of another set of records?
        If yes, consider which is the lead set of records. If there is no further business need for the extra set, they can be destroyed immediately. Before destroying a duplicate set, it is advisable to consult with the 'owners' of the record set to confirm that they are aware of their responsibilities and have no gaps in their records.

Annex A contains a sample record collection questionnaire for collecting this information.

2.   Identify any relevant documentation

Consider whether there any existing policies, procedures or documentation that would be relevant to these records. Apart from indexes and lists of the records themselves, relevant documentation would include retention schedules, either for these records or for their successors or predecessors. Look at the University's archive selection criteria within the Collections Management Policy to familiarise yourself with the sort of material that should be offered to the University Archive.

3.   Conduct an initial survey of the records

Do not look at every file, but try to form an overall impression of the record collection. You should do this by looking at a small, unscientific sample of the files. Exactly how many files you will need to look at will depend on how much variety you discover, how much background information you already have, and how accurate that information seems in the light of your examination of the files, but aim to keep it to a minimum.

Consider the following questions:

How many linear metres of records are there?
Do the records conform to your expectations given the information you have already collected?
-       If no, you will need to do further research, using the records themselves, to revise your answers to the questions in section 1.
Can you collect additional background information from the records, such as the date range or more information about subject matter or the identity of the records creators?
If there is a catalogue, do the files match the files listed in the catalogue?
Are the records similar to those listed in a more recent retention schedule?
Do the contents of the files match up with their titles?
Is there any logic to the physical organisation of the records?
-       Are they organised into files?
-       Are similar types of records grouped together?
        If so, it should be possible to take a retention decision about these records as a bloc rather than on a file-by-file basis.
-       Are the files organised in a meaningful order?

4.   Develop selection criteria

Based on the information you have collected so far, develop some basic selection criteria for the record collection. These will include identifying types of records that can be destroyed, either now or at a date in the future, types of records that are still required for everyday business and should be integrated into current filing systems, and types of records that should be offered to the University Archive. Developing the criteria is an iterative process, as you will want to go back to them to add new decisions as your experience of working with the records grows.

In developing the criteria, refer to any existing retention schedules for related records, to the University Archive selection policy and selection criteria, and to the 'Deciding what to keep' section of the retention scheduling guidance.

5.   Paper review

If there is a pre-existing list of the legacy records, examine the list and apply the criteria to the obvious 'wins'. For example, if your criteria say that student records over six years old can be destroyed, and the list has a large tranche of student records dating from the 1980s, the list can be annotated that these should all be destroyed.

6.   Sort and organise the records

If the records are not already in a logical order, then insofar as is possible, sort and organise them on the basis of the information contained on their covers or other background information known to you. If the records have reference numbers, they could be organised by reference number, or alternatively try to group together similar records on the basis of their title or the name of the person who created them. Do not inspect the records in any detail, but if, during the sort, you come across records that clearly meet your specified retention criteria, then deal with immediately. For example, if you know that the collection contains the master set of faculty group management committee minutes, as you come across these files they could be set aside for the attention of the University Archivist. Likewise, if you already have a list of the records and were able to take some decisions on the basis of the information in the list, these decisions can be implemented at this stage immediately.

If the records have no information on their covers and you do not have any background information to distinguish one from another, then skip this stage.

6.   Sample the records

This stage should only be used where you have insufficient information to sort and organise the records in any other way eg when dealing with loose papers. Usually it is sufficient to carry out a systematic sample, that is looking at files or papers at regular intervals eg every tenth file, or papers at intervals of 1 cm. This is not a scientific process, and you may need to modify the frequency of the sample as you are working. For example, if you find that the files are of a similar type, then it may be possible to reduce the size of the sample. At the least, the outcome of the sample exercise will be the background information necessary to develop selection criteria for stage 7, but if the all the records, or groups of the records prove to be similar, then it may be possible to take a retention decision on the basis of the sample alone.

7.   File-by-file examination of the records

This stage involves looking at each file individually to assess its value in accordance with your already-determined selection criteria. File-by-file review should only be used as a last resort, once you have used the methods above to winnow down the number of files for examination. The aim should be to spend the minimum amount of time looking at each file or batch of papers. You should never spend more than 10 minutes looking at a file, and the average should be not more than 5 minutes.

Please note that it is rarely cost-effective to conduct a special exercise to weed out individual papers from files. Instead, come to a conclusion on the overall value of the file based on the maximum retention period required by any of the papers it contains. For example, if the file contains a mixture of papers that can be destroyed now, papers that can be destroyed in two years' time, and papers that should be offered to the University Archive, then the entire file should be offered to the University Archive.

When considering an individual file, you should avoid looking at every paper in the file. Instead, use the following 'short cuts':

Look at the title of the file. If you know that the titling is reliable, is it possible to take a decision simply on the basis of the title?
Find the earliest and last date on the file as the currency of the information will affect how long it should be kept.
Consider the external appearance of the file. Does the cover look very worn? If so, this may be an indicator that the file related to an important topic as the file has been much used. Is the file thick or thin? If the file is very thin, it might be because it relates to a trivial matter.
Scan through the file, trying to identify key papers and pieces of information. Only read the key papers in detail. Use this scan to form an impression of the nature of the file, and, therefore, to decide how long it should be kept.

8.   Compile a record of your decisions

Whenever records are destroyed you will be expected to create a permanent record of what records were destroyed, when, why and on whose authority. Annex B contains a record review sheet that you can use to record your decisions for individual files. Alternatively, you can add aggregate information on the disposal of the records to the background information sheet contained in Annex A.

How do I decide which records I need to keep and develop my selection criteria?

In deciding how long to keep the records, you should consider their relationship with other records, the business (including legal and accountability) need for the records, the costs associated with keeping the records and their long-term research value. Figure 1 shows this process as a flow chart.

1.   Consider the relationship with other records

You should ask the following questions:

Do these records support the interpretation and use of other records?
        If yes, you must consider both sets of records together to ensure that
        their retention periods are co-ordinated.
Do these records duplicate other records, held within the business unit or elsewhere?
        If yes, you should decide which set is the official record. (For example,
        the chair or secretary of a committee will hold the official record set of
        its papers). The University only has a business need for one official

record set. All others should be destroyed. (In some cases, business sections may decide to keep a duplicate set for a short time, for reasons of convenience. This might arise if you need to consult the records regularly and you do not have quick and easy access to the record set). Before destroying a duplicate set, it is advisable to consult with the 'owners' of the record set to confirm that they are aware of their responsibilities and have no gaps in their records.

If these records are derived from a wider body of information, how much value do they add to the original information?

Do we need to keep the wider information and these records or will one of the sets of information suffice?

2.	Consider the business need for, and long-term research value of, the records

You should ask the following questions:

For how long will there be a continuing need for this information for current business processes?

For how long are these records needed to document the business process/ decisions taken/ actions carried out for future reference use?

For how long are these records needed to fulfill legislative, regulatory or financial requirements?

For how long are these records needed for accountability purposes?

3.	Consider the possible implications of not having the records, balanced against the cost of keeping the records.

Every document retained represents a resource burden for the university, in terms of storage costs, administration, and freedom of information and data protection obligations.

4.	Consider if the records have a long-term research value for historical or other purposes.

These stages can be represented in the following matrix:

	High	Medium	Low	Very low
How likely is it that we will need the records again for business purposes?				
How serious would the consequences be if we did not have the records?				
How expensive is it to keep the records?				
What long-term research value do these records have?				

This matrix will not provide a simple answer, but is intended to help you to balance the issues involved in deciding whether to keep the records. A medium or high response to the first two, or the last, questions is a strong indication that the records should be kept, provided that the resource

implications are not too high. If a set of records is critical to the business of the organisation but the resource implications of keeping them are very high this collection will require careful consideration before fixing a retention period. Records consistently rated as low/very low are either not required for continuing business purposes or are likely to merit preservation for a short period eg 1-2 years.

You can use this matrix to help you decide the retention period for records by considering how the answers to the questions would change over time. Possible retention periods to consider are, immediately after creation, after 6 months, after 1 year, after 2 years, after 5 years, after 10 years etc. You are unlikely to need to consider each of these periods for every record set.

You must not destroy any records which are currently the subject of a data protection or a freedom of information request until the response to the request is complete.

How do I integrate my legacy records into existing systems?

Loose papers should be sorted and organised into files. The files should be added to the appropriate place in the filing scheme and added to the records inventory.

If the records are already organised into files, these files should be added to the appropriate place in the filing scheme and added to the records inventory. It may be that the files already have references and are organised into a filing scheme different from the current one. If this is the case, do not go to the trouble of reorganising the files: set up a new level in your current filing scheme for the legacy records and incorporate them wholesale.

When dealing with rarely consulted files, it may not even be necessary to itemise the records in the inventory; a group entry could be made in the inventory instead. This is a particularly effective approach if there is already a list of the records, or if the records are already organised in a logical order that makes them easy to locate.

I have a batch of case records of varying dates. How do I apply retention periods to them?

Frequently, the retention period for a case record is expressed in terms of a number of years after a trigger event, such as 'destroy four years after graduation.' With legacy records of mixed dates, it would be very time consuming to examine each file to establish when the trigger even occurred and, therefore, exactly when that record should be destroyed. It is usually more cost effective to make a conservative estimate of the likely latest retention period of any record in the set, and to assign this period to all the records.

This approach can also work with other types of files, but is most effective when dealing with case files.

How long should I allow to clear out my legacy records?

As a rule of thumb, for file-by-file review, expect to clear two to three metres per person day.

What help is available?

The University's Records Manager provides advice, guidance and training on records management issues. Although it is the local area's responsibility to review legacy records, training and advice can be provided on deciding what records you need to keep, and tracking work in progress.

The Joint Information Systems Committee (JISC) has prepared a high-level retention schedule for the functions and activities of universities. This can use as the starting point for deciding the retention periods of our records but requires considerable customisation. It can be found at:

Records retention management - Jisc

The National Archives has prepared model retention schedules for common types of government records, including buildings, personnel, finance, health and safety, projects, press and publicity, complaints, contracts, internal audit and information management records. Although the recommended retention periods are for government records rather than University ones, these schedules are a useful source of precedents. They can be found at:

Advice on retention - The National Archives

Susan Graham
June 2004

Legacy Records Collection Background Information

1.	**Information about the records creators**	
	Either:	
1.1a	Which business area created the records?	
1.2a	For what was the area responsible?	
Or:		
1.1b	What were the names of the people who created the records?	
1.2b	What job(s) did they do?	
2.	**Information about the records themselves**	
2.1	How many linear metres of records are there?	
2.2	What are the records about?	
2.3	What is their date range?	
2.4	How are the records organised?	
2.5	Are the records still used?	**YES/NO**
	If YES, who uses them and why?	

2.6	Are there any existing indexes, lists or other reference sources?	**YES/NO**
	If YES, how reliable are they?	
2.7	Are there any relevant retention schedules?	**YES/NO**
3.	**Relationship with other records**	
3.1	Are the records a predecessor of a current set of records?	**YES/NO**
	If YES, please give further details.	
3.2	Are they used in conjunction with another set of records?	**YES/NO**
	If YES, please give further details.	
3.3	Are they the continuation of another set of records already held elsewhere?	**YES/NO**
	If YES, please give further details.	
3.4	Do these records duplicate records held elsewhere in the University?	**YES/NO**
	If YES, please give further details.	
4.	**Selection criteria (optional section)**	
4.1	Please give details of your selection criteria	

4.2	Please give details of the retention outcomes	

Annex B

Records Review Sheet

Name: **Business Unit:**

File ref	Title/Description	First date	Last date	Decision	Reason

Annex C

Example of a Completed Records Review Sheet

Name: Susan Graham   **Business Unit:** Records Management Section

File ref	Title/Description	First date	Last date	Decision	Reason
AA/1/1	Data protection: subject access requests: policy and procedure	1998	2002	Retain until policy superseded	Shows rationale behind current policy and procedures
AA/1/2	Data protection: subject access requests: Mr William Shakespeare	1999	1999	Destroy	Out-of-date case file
AA/1/3	Data protection: subject access requests: Ms Antonia Forest	2004	2004	Keep for 1 year	Retention schedule recommendation

Clearing Out a Small Collection of Old Paper Records

How do I go about clearing out a collection of old paper records?

When clearing out old records, the aim is to identify those records that should be offered to the University Archives, to dispose of those records that are no longer required, and to identify those records still required for business reasons and to integrate them into the current recordkeeping systems.

This section provides step-by-step instructions for clearing out a set of old records.

1.   Background research

The first step should be to find out the background to the records. Try to answer the following questions (without doing detailed research):

Who created these records?
- What business area(s) were they from?
- What were their responsibilities?

Are there any existing filing schemes, indexes, lists or catalogues for the records?
Are the records still used?

Do these records have a relationship with any other records held by the University, possibly in another business area or the University Archives?
- Are they the predecessor of a current set of records?
     If yes, perhaps the current records have a retention schedule that you can also apply to these records.
- Are they used in conjunction with another set of records?
     If yes, consider the two sets of records together.
- Are they the continuation of a series of records already held elsewhere?
     If yes, apply the same disposal criteria to both sets of records.
- Are they a duplicate of another set of records?
     If yes, consider which is the lead set of records. If there is no further business need for the extra set, they can be destroyed immediately. Before destroying a duplicate set, it is advisable to consult with the 'owners' of the record set to confirm that they are aware of their responsibilities and have no gaps in their records.

Annex A contains a sample record collection questionnaire for collecting this information.

2.   Identify any relevant documentation

Consider whether there any existing policies, procedures or documentation that would be relevant to these records. Apart from indexes and lists of the records themselves, relevant documentation would include retention schedules, either for these records or

for their successors or predecessors. Look at the University's archive selection criteria within the Collections Management Policy to familiarise yourself with the sort of material that should be offered to the University Archive.

3.   Sort and organise the records

If the records are not already in a logical order, then insofar as is possible, sort and organise them on the basis of the information contained on their covers or other background information known to you. If the records have reference numbers, they could be organised by reference number, or alternatively try to group together similar records on the basis of their title or the name of the person who created them. If the records have no information on their covers and you do not have any background information to distinguish one from another, then skip this stage. Do not inspect the records in any detail, but if, during the sort, you come across records where the outcome is clear, then deal with them immediately. For example, if you know that the collection contains the master set of faculty group management committee minutes, as you come across these files they could be set aside for the attention of the University Archivist.

4.   File-by-file examination of the records

This stage involves looking at each file individually to assess its value. The aim should be to spend the minimum amount of time looking at each file or batch of papers. You should never spend more than 10 minutes looking at a file, and the average should be not more than 5 minutes. Please note that it is rarely cost-effective to conduct a special exercise to weed out individual papers from files. Instead, come to a conclusion on the overall value of the file based on the maximum retention period required by any of the papers it contains. For example, if the file contains a mixture of papers that can be destroyed now, papers that can be destroyed in two years' time, and papers that should be offered to the University Archive, then the entire file should be offered to the University Archive.

When considering an individual file, you should avoid looking at every paper in the file. Instead, use the following 'short cuts':

Look at the title of the file. If you know that the titling is reliable, is it possible to take a decision simply on the basis of the title?
Find the earliest and last date on the file as the currency of the information will affect how long it should be kept.
Consider the external appearance of the file. Does the cover look very worn? If so, this may be an indicator that the file related to an important topic as the file has been much used. Is the file thick or thin? If the file is very thin, it might be because it relates to a trivial matter.
Scan through the file, trying to identify key papers and pieces of information. Only read the key papers in detail. Use this scan to form an impression of the nature of the file, and, therefore, to decide how long it should be kept.

5.   Compile a record of your decisions

From 1 January 2005, whenever records are destroyed you will be expected to create a permanent record of what records were destroyed, when, why and on whose authority. Annex B contains a record review sheet that you can use to record your decisions for individual files if you are not destroying them in line with a retention schedule.

How do I decide which records I need to keep?

In deciding how long to keep the records, you should consider their relationship with other records, the business (including legal and accountability) need for the records, the costs associated with keeping the records and their long-term research value. Figure 1 shows this process as a flow chart.

These stages can be represented in the following matrix:

	High	Medium	Low	Very low
How likely is it that we will need the records again for business purposes?				
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This matrix will not provide a simple answer, but is intended to help you to balance the issues involved in deciding whether to keep the records. A medium or high response to the first two, or the last, questions is a strong indication that the records should be kept, provided that the resource implications are not too high. If a set of records is critical to the business of the organisation but the resource implications of keeping them are very high this collection will require careful consideration before fixing a retention period. Records consistently rated as low/very low are either not required for continuing business purposes or are likely to merit preservation for a short period eg 1-2 years.

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Susan Graham
June 2004

Figure 1: Deciding what to keep

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┌─────────────────────┐
│ Do the records      │  Yes   ┌──────────────────────┐
│ support the         │ ─────> │ Consider both sets of│
│ interpretation and  │        │ records together     │
│ use of other        │        └──────────────────────┘
│ records?            │
└──────────┬──────────┘
           │ No
           ▼
┌─────────────────┐
│ Do the records  │ Yes  ┌──────────────┐   ┌──────────────────┐   ┌────────────────────┐
│ duplicate other │ ───> │ Identify the │──>│ Consult with     │──>│ Either destroy the │
│ records?        │      │ 'golden copy'│   │ holders of the   │   │ duplicates or keep │
└────────┬────────┘      └──────────────┘   │ 'golden copy'    │   │ for a short time   │
         │ No                               └──────────────────┘   │ for convenience    │
         ▼                                                         └────────────────────┘
┌─────────────────┐
│ Are these       │ Yes  ┌─────────────────┐   ┌──────────────┐   ┌────────────────────┐
│ records derived │ ───> │ Do we need to   │──>│ Decide which │──>│ Either destroy the │
│ from a wider    │      │ keep both sets  │   │ set to keep  │   │ unwanted records   │
│ body of         │      │ of information? │   └──────────────┘   │ or keep for a      │
│ information?    │      └───────┬─────────┘                      │ short time for     │
└────────┬────────┘      No      │ Yes                            │ reference          │
         │ No                                                     └────────────────────┘
         ▼
┌─────────────────┐
│ Are the records │ Yes  ┌──────────────────┐
│ needed for the  │ ───> │ For how long?    │
│ conduct of      │      └──────────────────┘
│ current         │
│ business?       │
└────────┬────────┘
         │ No
         ▼
┌─────────────────┐
│ Are the records │ Yes  ┌──────────────────┐
│ needed for      │ ───> │ For how long?    │
│ reference       │      └──────────────────┘
│ purposes?       │
└────────┬────────┘
         │ No
         ▼
       ┌─────┐
       │  A  │
       └─────┘
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A

Are the records needed for legislative or regulatory reasons?

Yes → For how long?

No

Are the records needed for accountability purposes?

Yes → For how long?

No

What are the cost implications of keeping these records?

Low → The retention period should be the longest period identified in response to the question, 'For how long?' (Subject to cost assessment)

High

Confirm that value of records justifies cost of retention by considering consequences of not having records

Yes → Retention decision remains unaltered

No

Revise retention decision

Do the records have long-term research value?

Yes → Transfer to the University Archives once administrative need has ceased

Destroy in line with retention schedule