

Reviewing Procedures

1. Scope

- 1.1. This standard is a best practice benchmark for all organizations creating or holding public records.
- 1.2. It provides advice and guidance on the reviewing of public records by public bodies.
- 1.3. It applies to all records – paper, microform, film, videotape, sound recordings, etc, – except electronic records, which are the subject of a separate standard.

2. Responsibilities

- 2.1. It is the Departmental Record Officer's (DRO's)/Information Manager's (IM's) or public authority equivalent's responsibility to see that Reviews are systematically carried out, so as to eliminate redundant information and reduce the bulk of records held by departments and agencies, while ensuring that no papers likely to be required for business continuity reasons and/or permanent preservation are destroyed.

3. Assessing the Value of Records

3.1. *Questions to Ask:*

The destruction of records cannot be reversed; however, the cost of preserving records, which are not worthy of permanent preservation, is high. Thus the process of identifying and selecting records of permanent value is a very important task. When a Public Body is assessing records for destruction/retention, they need **only** consider administrative requirements. In assessing these requirements, the desk officer should ask the following questions:

- (1) Is there a continuing need to retain this record for the conduct of day-to-day business?
- (2) Is there clear evidence of a future need for constant reference to this record?
- (3) Will it be needed to deal with enquiries in the future?
- (4) How many enquiries are likely?
- (5) Is the information needed for statistical analysis within the organization? Are there bodies of statistical information upon which future policies and forecasts may be based?

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- (6) Is the information required for conducting legal proceedings in the event of a legal action being taken by, or against, the organization?
- (7) Is there a legal requirement to retain these records (for example, health and safety regulations)?
- (8) Is there a financial need to retain these records (for example, for audit purposes)?
- (9) Is the information significant because it provides precedents or is required for authorization purposes?
- (10) Is the information otherwise available, whether within the Public Body or elsewhere, or in published form?

4. The First Review

4.1. *When?*

The First Review takes place 5 years from the date of the last paper on the file and should not be later than 10 years from the opening of the file. Records of long-term administrative use need not be brought forward for the First Review.

4.2. *How?*

After checking that the file is not identified on the Disposal Schedule as part of a class to be either destroyed or permanently preserved, it should be brought forward to the desk officer concerned with its subject matter. A standard First Review form (pink) placed on the file asks that officer to decide whether it should be retained and if so, how long it should be retained for and the reason for retention. The officer's decision will be based solely on administrative need. Records of value, whether for administrative or historical reasons, are vulnerable at First Review and so, although many files are likely to be of no permanent value, PRONI will examine those files earmarked for destruction by the Public Body to assess their potential historical importance. If a file is recommended for retention by the Reviewer, it will be retained by the Public Body until it is due for Second Review (i.e., after a further 15 years).

- 4.3. The Public Body is responsible for destroying those files which neither PRONI nor the Public Body consider worthy of retention. It is also responsible for keeping accurate documentation on the whole review process and the final future of the records concerned.

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5. The Second Review

5.1. When?

The Second Review takes place 20 years from the date of the last paper on the file ie, not from the date of closure of the file. Any variation requires the agreement of PRONI.

5.2. How?

PRONI's staff will examine the records first of all so that the officers of the Public Body need only review those not selected by PRONI and are then relieved of unnecessary reviewing. PRONI staff will not necessarily be fully acquainted with the structure and functions of a Public Body, so when files are brought forward for Second Review it is important that the department of origin is clearly identified and that any appropriate background information about the series is conveyed to PRONI's reviewing staff. Particular attention should be paid to whether the information contained in a file has been published – this will have a direct bearing on the fate of the file – and PRONI's reviewing staff should be so advised.

Those files marked for destruction by PRONI will then be examined by the officers of the Public Body who will decide again only on administrative grounds, whether they should be retained permanently. If retention is advised, the reason must be clearly stated on a Second Review form (green), which should be attached to the file. Those files selected for permanent preservation by the Public Body (with the agreement of PRONI) or, in the first instance, by PRONI, will need to record access decisions on the PR 14 forms before they can be transferred to PRONI. Protectively marked files should be declassified at this stage also. If, at the Second Review stage, the Public Body wishes to retain any files for a further term of years, it is the responsibility of the Body to retain any such files and to dispose of them when the period of retention has lapsed.

6. Weeding or Stripping Files

- 6.1. Many files contain duplicate or other ephemeral material which, by its removal, may reduce the bulk of papers retained but it is a very tedious task and is rarely cost effective. More importantly, misunderstanding of the procedure could give rise to public criticism. **IT MUST BE APPLIED WITH THE UTMOST CAUTION AND ONLY AFTER CONSULTATION WITH PRONI.**