

Disposal of client files and sub files Procedure

1. Purpose

Client files and sub files are to be sentenced for disposal in a timely manner and in accordance with an approved and current records disposal schedule (RDS). They should be consigned to either off site intermediate storage awaiting destruction or to State Records for permanent retention.

Records will be maintained of client files and sub files that are held off site, in the form of consignment lists. All Department for Child Protection (DCP) employees need to be aware that physical files and notes (including staff notebooks) may be subpoenaed or requested as part of an Ombudsman or Freedom of Information (FOI) enquiry/application.

It should be noted that the term, Aboriginal, refers to all people who identify as Aboriginal or Torres Strait Islander or both Aboriginal and Torres Strait Islander. This term is used as the First Nations peoples of South Australia are predominantly Aboriginal peoples and it is a preferred term. We acknowledge and respect that it is preferable to identify Aboriginal peoples, where possible, by the specific language group or Nation.

2. Scope

This procedure applies to all DCP staff who create, receive, assess, distribute and maintain hardcopy client files and sub files.

3. Authority

3.1 Legislative context

- [State Records Act 1997](#)
- [Freedom of Information Act 1991](#)

3.2 Whole of Government requirements

- [Information Management Strategy](#)
- [Information Management Standard](#)
- [Appraisal Standard](#)
- [Disposal Standard](#)

3.3 DCP requirements

- Operational Records Disposal Schedule:
 - [Records Disposal Schedule September 2007 version 1 – functions, activities, disposal actions](#)
 - [Records Disposal Schedule September 2007 version 1 – preamble, usage, context, scope](#)

4. Procedure requirements

4.1 Supplies

To appropriately dispose of client files and sub files, staff need to ensure they have supplies. Boxes can be ordered from Grace Records by:

- completing the [Box supply order form](#) and emailing it to Grace Records (recordssa@grace.com.au). A copy of the order must be emailed to DCPInformationManagementTeam@sa.gov.au
- including the appropriate account code on the order form from the list at the end of this procedure in section 'Record series numbers and account codes'. Grace Records will only use listed account codes.

Grace Records will make arrangements for delivery of the boxes.

NOTE: If a large quantity of files need to be disposed of, ensure that sufficient Grace Records Standard boxes (315 x 410 x 260 mm) have been ordered. Also have a supply of Grace Records Type 1 boxes (171 x 371 x 256 mm) for use when the last Standard box in a consignment might be less than half full or if undertaking disposal of permanent files.

Legal tape (cotton tape) may be required to bind loose documents into file covers. The tape is available from stationery suppliers.

For advice about the mending or replacement of file covers that are in poor condition, contact the Information Management Team via email DCPInformationManagementTeam@sa.gov.au.

4.1.1 Temporary files

Grace Records Standard boxes and Grace Records Type 1 boxes should be used for temporary files.

State Records Type 1 boxes (which can also be ordered from Grace Records) must not be used for the disposal of temporary client files.

The important difference between Grace Records and State Records archive boxes is the lid arrangement. Grace Records box lids are wider and sturdier, as Grace Records stack boxes on top of each other on shelves, whereas State Records' shelving accommodates the height of a single box.

4.1.2 Permanent files

Boxes containing permanent files will be transferred to State Records in the future. In the meantime, they will be transferred to Grace Records for storage while awaiting State Records' approval to transfer.

State Records has different storage requirements and mainly use State Records Type 1 boxes (165 x 370 x 250 mm). Boxes with printed Grace Records, Fort Knox, DocStore, Recall or AusDoc logos must not be used for the disposal of permanent client files to State Records.

As the boxes will initially be transferred to Grace Records, logoed Type 1 boxes will be acceptable, with Grace Records boxes being preferred.

4.2 Preparing the consignments

Client files may be disposed of, regardless of the age of the client, if the file has been inactive for three years. However, C3MS must be checked for open cases regarding these clients.

4.2.1 Preparing the files

Do not place files inside other files and do not tie together file parts or different file types.

Client files are maintained in storage for many years. It is important for care to be taken to prevent deterioration of their paper contents by:

- removing all metal fasteners and replacing with plastic tube fasteners
- removing bulldog clips, metal paper clips (which can be replaced with plastic paper clips), and excess (but not necessarily all) staples
- removing all sticky tabs and post-it notes. If they contain important information, photocopy the page with the note attached and file the photocopy on top of the original page
- not using sticky tape to repair documents. Photocopy the document and file the photocopy on top of the original
- photocopying faxes that are printed on thermal paper and filing the copy on top of the original (the text on thermal paper fades over time).

4.2.2 Empty client files

Empty Type 85 client files and sub files are not official records. However, because they are registered in File Tracker their disposal must be recorded.

Due to the possibility that loose documents may be filed in an empty file cover in the future, the empty files will be sent to temporary storage for a period of 20 years (from the date of disposal).

Empty Type 85 client files should be sent to the Information Management Team, who will consign them to storage. Transfer them on File Tracker to *Records Management (512)*.

For empty sub files, please contact the Information Management Team for advice.

4.2.3 Sub files

A client's master case file (Type 85) must be disposed of together with all of its sub files, except where sub files have already been consigned to State Records or Grace Records. The following file types are not sub files to the Type 85:

- Financial Counselling (Type 87) files – wherever possible the Type 87 should be consigned to storage at the same time as any other files and sub files for that client
- Freedom of Information (Type 97) files
- Foster Parent (Type 70) files – send to the Carer Approval and Review Unit for disposal
- Supported Carer (Type 71) files, which are sub files to Foster Parent files – send to the Carer Approval and Review Unit for disposal
- Type 80 (check contents to determine whether it is a Burial file or Special Care file) files:
 - Burial file – send to Funeral Assistance SA, Concessions and Support Services, Department of Human Services for disposal (it will be retained permanently)
 - Special Care file – process with other client files.

4.2.4 Consignment Types

There are three different categories of consignments that may need to be completed.

4.2.4.1 Permanent

Permanent consignments can consist of the following files for:

- Adoption (Type 60 or equivalent) – relating to adoptive parents or children, where the adoption proceeds
- Freedom of Information (Type 97) – where the FOI cases are precedent setting or if they have generated substantial public interest (this batch includes FOI files for clients who fit into the last three points following:)

- clients identified as Aboriginal or Torres Strait Islander, including such clients whose surname at the time of disposal begins with the letter “P”
- clients who have died in residential or secure care or while under the guardianship of the Minister/Chief Executive at the time of death
- other clients whose surname at the time of disposal begins with the letter “P” (this is a sample consignment of client files which is to be retained at State Records).

Sort each of the above files into batches (consignments). Within each batch sort the files into alphabetical order by client surname and each client’s files into file type, then file part order.

It does not matter if a client’s date of birth is unknown, although it is expected that file contents will be checked for this information.

4.2.4.2 Temporary

Temporary consignments consist of all other client files that do not fall into the permanent category.

Client files

Sort files into date of birth batches, with a five year time span. For example, clients born 1995 – 1999, 2000 – 2004, etc. Each batch constitutes one consignment. Files with a range of very old dates of birth, for example 1925 – 1942, may be grouped into a single batch.

If a client’s date of birth is unknown, even after checking the file’s contents, put the file aside. All such files are to be placed into a single, separate consignment.

Sort each batch or consignment into alphabetical order (by client’s surname), and each client’s files into file type, then file part order. For example, Type 55, 62, 85/A, 85/B, 86, 87, 88, 99/A, 99/B, 99/C.

FOI files

FOI (Type 97) files should be batched in years. For example, all files closed in 2013 will constitute one consignment, all 2014 files will constitute another consignment and so on.

Sort each batch or consignment into alphabetical order (by client’s surname) and then each client’s files into file part order.

4.2.4.3 Special

A client file or a sub file consisting of many parts, that will not fit into a single Grace Records Standard box (temporary files) or State Records Type 1 box (permanent files), cannot be disposed of without the approval of the Information Management Team. DCP’s File Tracker (system) cannot accommodate more than one box number against a file with multiple parts. These files and their related sub files will be consigned in a separate ‘special’ consignment.

Special consignments may need to be created for both permanent (Special Perm) and temporary (Special Temp) client files.

Contact the Information Management Team via email DCPInformationManagementTeam@sa.gov.au to request a special consignment template.

4.3 Sentencing the files

Client files and sub files are sentenced under *Records Disposal Schedule (RDS) 2007/09 Version 1* (published on the DCP Intranet as [Records Disposal Schedule September 2007 version 1 - functions, activities, disposal actions](#)).

Descriptions of client file types, names, usage and contents can be found on pages 19-27 of the [Records Disposal Schedule September 2007 version 1 - preamble, usage, context, scope](#)

Using a pencil, write the RDS number, version and item number in the archival action section of the file cover. The format is RDS 2007/09 v1: item no. (for example, RDS 2007/09 v1: 2.5.10). If the cover does not have an archival action section, write the details on the bottom half of the front file cover, underneath the file part (if possible).

The client files of Aboriginal and Torres Strait Islanders should be sentenced upon creation. Do not write 'Aboriginal' on the file cover.

- FOI files – ensure that the Start and End Dates are written on the file covers
 - the Start Date is when the FOI application was received by DCP
 - the End Date is when the determination has been made and all correspondence has been finalised.
- Foster Care and Kinship Care files – ensure that the Open and Closed Dates are written on the file covers
 - the Open Date is when the application was received by DCP
 - the Closed Date is when the carer is no longer a registered carer and all correspondence has been finalised.

Disposal Actions can be found in the following sections of the Records Disposal Schedule (RDS):

File Type	RDS Section	Function / Activity
Adoption files	RDS 2007/09 v1: 1.5	Adoption Services / Case Management
All other Client files and Sub files including FOI files	RDS 2007/09 v1: 2.5	Care and Protection / Case Management

The retention period for most temporary files, according to RDS 2007/09 v1, is 105 years after date of birth or 105 years after action completed. The exceptions are:

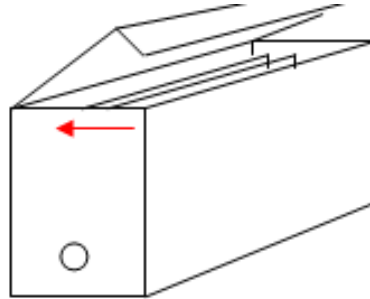
- Adoption (Type 60) files, where prospective parents do not adopt a child – 30 years after action completed (see RDS 2007/09 v1: 1.5.4) – these files are not registered on File Tracker.
- most Freedom of Information (Type 97) files – 25 years after action completed (see RDS 2007/09 v1: 2.5.8).

4.4 Boxing and listing the files

Identify your location's client files series number from the list at the end of this procedure. Also identify the next available consignment number for the series. The Information Management Team can provide this information.

Place the files into the boxes in correct sequence (i.e. alphabetical > file type > file part), beginning at the front of the box and working towards the back (i.e. towards the lid join). Ensure:

- the files are placed upright (open long edge to the top) with the client's name facing towards the front of the box.
- boxes are not overfilled as this causes difficulties in the handling and return of retrievals; leave a 5 cm gap.



4.4.1 Permanent consignments

The Information Management Team will allocate an A900 series number for permanent consignments (along with the permanent series number (GRS) for archiving in File Tracker) to allow the transfer to temporary storage at Grace Records.

In pencil, write the box details, including the series / consignment number and box number in the format shown here.

<p>GRS 4198/0028/P</p> <p>2006 – 2012</p> <p>ANG</p> <p>BES</p> <div style="display: flex; justify-content: space-around; align-items: center; margin-top: 20px;"> <div style="border: 1px solid black; border-radius: 50%; width: 40px; height: 40px; margin: 0 auto;"></div> <div style="font-size: 24px; margin-left: 20px;">2</div> </div>
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The date range and alphabetical range can be inserted after the boxing and listing is finalised and checked.

State Records requires start and end dates (year only) and alpha ranges of the contents of each box.

- The start date (for example, 2006) is the earliest year of birth of clients in this box – there should be no documents dated earlier than that in the box.
- The end date (for example, 2012) is the year that is three years prior to the preparation of this consignment (the example reflects that the consignment was prepared in 2015). All files in the consignment have been inactive for three years, and there should be no documents in the box that are dated later than the box's end date.
- The alphabetical range is the first three letters of the surnames of the first and last clients in this box (for example, clients ANGUS to BEST).

4.4.2 Temporary consignments

In pencil, write the full box number in, or alongside, the area on the box that is allocated to the barcode, so that when the barcodes arrive each may be matched with its box.

The box number format is A ___ / ___ / ___ (for example, A201/0052/001).

4.4.3 File Tracker

Record the consignment details for each file in File Tracker:

- search to locate the relevant client's files, for example 90000438
- select the file type to be archived, for example 85 – Contact file
- click the *Archive* button on the file record screen
- select if the archive is *Temporary* or *Permanent*
- click in the next field to select where the file is being archived
- the *Series* number will be automatically populated, for example A204 or [GRS] 4200
- enter the *Consignment* number, for example 0002 and *Box* number, for example 007
- enter a *Remark* if needed
- click *Confirm*.

Run the 'Files by Archive Number' report from File Tracker:

- click the *Files by Archive Number* button on the Home screen
- enter the *Series* number, for example A204
- enter the *Consignment* number, for example 0002
- click *Generate Report*
- the report will generate as an Excel Spreadsheet.

Note: Instructions for using File Tracker can be found in the [File Tracker Guide](#) available on the DCP intranet.

Check the contents of all boxes against the report. If adjustments are necessary, contact the Information Management Team.

If dates of birth are missing from the report, try to identify the dates or years of birth from the contents of the files. Type the dates on the report against the clients' names.

If no date or year of birth can be found, remove the file from the consignment, and indicate on the report that the consignment details relating to that file should be deleted from File Tracker.

If you have enough client files without dates of birth/years of birth to fill an archive box, make a separate consignment of those files. The retention period of 105 years will be calculated from the date the consignment was prepared.

4.4.4 FOI, Foster Care and Kinship Care files/reports

For FOI, Foster Care and Kinship Care files, add the Start and End Dates against each file on the 'Files by Archive Number' report. These dates are required for applying the sentence to the file and are added to the final consignment list.

On Foster Care and Kinship Care files reports, also add the secondary parties Name and Date of Birth details to the same column as the primary party on the report. These will be added to the final consignment list.

4.4.5 Finalise and barcode the boxes

Conduct a final check of the contents of the boxes against the 'Files by Archive Number' report in the presence of your Business Manager.

Complete a [Temporary Consignment List Cover Sheet \(Grace Records\)](#) which can be found on the DCP Intranet.

Email to the Information Management Team via DCPInformationManagementTeam@sa.gov.au:

- the checked 'Files by Archive Number' reports (retain copies for your own information)
- copies of your Temporary Consignment List Cover Sheets (Grace Records).

The Information Management Team will:

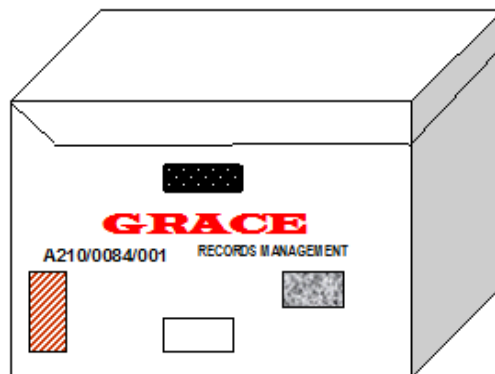
- allocate the barcodes and send them to you
- complete the consignment lists
- maintain an electronic copy of your consignment lists.

When the barcodes are received, attach them to the correct boxes in the 'Place Label Here' section (on Grace Records boxes) or on one of the narrow ends of the State Records boxes. Refer to the *Transfer of consignments* form the Information Management Team provided, for details to assist with matching the barcodes to their boxes.

Above or below the barcode write the full box number with a black marker (for example, A210/0084/001), except on Type 1 boxes, where the number should be written at the bottom right corner of the box (narrow end).

This is a safeguard against any future fading of or damage to the number on the barcode label and reduces the risk of the number being covered by the barcode labels of future storage providers.

Do not write anything on the box that may identify its contents.



4.5 Transferring the boxes

4.5.1 Transfer from metropolitan offices

- Email a completed *Transfer of consignments form: Temporary records transfer to Grace Records* (received from the Information Management Team) to Grace Records, notifying them that the boxes are ready for collection.
- Email a copy of the form to DCPInformationManagementTeam@sa.gov.au and notify the Information Management Team when the boxes have been collected by Grace Records.

4.5.2 Transfer from country offices

- Make arrangements with Toll DX (or other approved courier) for the transport of the boxes to Grace Records, 25 Hewittson Road, Edinburgh North SA 5113.

- Before the boxes leave your location, email a completed *Transfer of consignments form: Temporary records transfer to Grace Records* (received from the Information Management Team) to Grace Records, so that they are aware of the impending arrival of the boxes.
- Email a copy of the form to DCPInformationManagementTeam@sa.gov.au and notify the Information Management Team when the boxes have been collected by the courier.

4.6 Record series numbers and account codes

Location	FILE TRACKER Location Code	GRACE RECORDS Series Nos.		STATE RECORDS Series Nos.	DCP Account Codes with Grace Records
		Client Files	FOI Files		
Adoption files		A914		GRS 914	8279
Blair Athol Office (formerly North Eastern)	053	A203	A518	GRS 4203	8107
Ceduna Office	022	A970	A511	GRS 3970	8185
Central Office (Records Management)	512	A504	A515	GRS 856	8257
Coober Pedy Office	121	A971	A512	GRS 3971	8186
Customer Services - Freedom of Information - Subpoena & Information Release	515		A714		8307 7012
Elizabeth Office	011	A200	A513	GRS 4200	8105
Gawler Office	106	A201	A516	GRS 4201	8106
Hindmarsh Office	129	A966		GRS 16031	8109
Inner South Office (formerly Marion)	026	A204	A509	GRS 4204	8196
Kadina Office	134	A975			8182
Limestone Coast Office	012	A209	A526	GRS 4209	8187
Mount Barker Office	135	A720	A968	GRS 15675	8197
Murraylands Office	035	A208	A519	GRS 4208	8188
Noarlunga Office	028	A205	A520	GRS 4205	8198
Playford Office	045	A973			8110
Port Augusta Office	021	A722	A521	GRS 3722	8189

Port Lincoln Office	023	A969	A522	GRS 3969	8190
Port Pirie Office	027	A967	A523	GRS 3967	8191
Riverland Office	025	A210	A524	GRS 4210	8184
Salisbury Office	014	A206	A525	GRS 4206	8108
St Marys Office	113	A202		GRS 4202	8195
Whyalla Office	015	A721	A527	GRS 3721	8192
Woodville Office (formerly Adelaide)	010 (033)	A207	A528	GRS 4207	8194

5. Compliance, monitoring and evaluation

This procedure is the responsibility of the Manager Information Governance and will be monitored by the Information Management Team with a review to be conducted every three years to ensure that it continues to be current and effective in meeting the desired outcomes.

6. Related documents

Related documents, forms and templates

[Information Governance & Systems Policy](#)

7. Roles and responsibilities

Role	Authority/responsibility for
Advice and support	Information Management Team – 8226 6725 DCPIInformationManagementTeam@sa.gov.au

8. Glossary

Term	Meaning
Case	An instance of a person, being a client, who is allocated to a responsible officer or team for ongoing service.
Client File	A physical receptacle for storing hard copy records for a client, whether or not that person has been designated a Case.
Consignment	A group of records that are disposed of together and that are allocated a sequential consignment number against the single series that they belong to.
Disposal	The retention, deletion or destruction of records in or from recordkeeping systems (also known as 'archiving').
RDS (Records Disposal Schedule)	Formal (legal) instrument that defines the retention periods and consequent disposal actions authorised for classes of operational records relating to the specific and unique (core) functions of the agency.

Term	Meaning
Record	Information created, received and maintained as evidence and information by the agency, in pursuance of legal obligations or in the transaction of business.
Records Management	Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.
Sentence	The application of a disposal action and retention period from a relevant disposal schedule to a record.
Series	Those records having the same agency, office or person of origin, which belong together because they are part of a discernible filing system (alphabetical, numerical, chronological, or a combination of these). They have been kept together because they result from the same activity or they are of similar formats and relate to a particular function.

Document control

Reference No./ File No.	Digital Workspace – Document Number D2022049374		
Document Owner	Lead Writer (name, position)		
Directorate/Unit: ICT & IM Directorate	Supervisor Information Management Team and Manager Information Governance		
Accountable Director: Accountable Director: Chief Information Officer			
Commencement date	6 March 2023	Review date	3 March 2026
Risk rating	Consequence Rating	Likelihood	Risk Rating
Risk Assessment Matrix	Minor	Unlikely	Low

REVISION RECORD		
Approval Date	Version	Revision description
3 March 2023	Version 2	Major review and reformat.
21/01/2016	Transitional	DECD document details and revision record, cover sheets applied.
28/05/2015	Version 1.1	DECD template applied.
31/07/2009	Version 1	Draft <i>Procedure: Disposal of Permanent Client Files and Sub Files</i> , draft <i>Procedure: Disposal of Temporary Client Files and Sub Files</i> and draft <i>Procedure: Disposal of Temporary Freedom of Information (97) Files</i> combined into a single document.