



DA 2017-006

**Sector Disposal Authority for Cemetery Boards**

DA Type: Sector

## Sector Disposal Authority for Cemetery Boards

<b>Disposal Authority No</b>	2017-006
<b>Disposal Authority Type</b>	Sector
<b>Organisation/s</b>	[Cemetery Boards]
<b>Disposal Authority Scope</b>	Fully revised Sector Disposal Authority for functional records of Cemetery Boards to supersede SD 2012026
<b>Disposal Authority Status</b>	Approved by SRC
<b>Status Date</b>	25/10/2017

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# INTRODUCTION

## 1. ABOUT THIS DISPOSAL AUTHORITY

### 1.1 Important Note

This SDA will be used in combination with the State Records Office publication *General Disposal Authority for State Government Information* which covers records of activities / categories that are common across State government.

The *SRO Guideline: Records Retention and Disposal* will be consulted before any disposal of records is conducted, whether as part of a formal / regular disposal program or on an ad hoc basis.

### **Records relevant to actual or alleged child sexual abuse and other records relating to children**

The final report of the Commonwealth Royal Commission into Institutional Responses to Child Sexual Abuse, released on 15 December 2017, contains several recommendations concerning recordkeeping by government organizations undertaking child-related functions or activities.

Organizations must be mindful of records that document, or may otherwise be relevant to, actual or alleged incidents of child sexual abuse, and the care, supervision, education and treatment of children by government employees, contractors, volunteers and outsourced service providers in contact with children. Such records may be subject to specific retention instructions as issued by the State Records Office.

### 1.2 Organisation Background

Cemetery Boards are established under section 7 of the *Cemeteries Act 1986* (or deemed to have been established under this Act) and are responsible for the care, control and management of the declared cemetery.

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### **1.3 Purpose of this SDA**

This SDA has been developed by the State Records Office in conjunction with the Cemetery Boards to form part of the Recordkeeping Plan of each Board, as required under section 16(3) (a-c) of the *State Records Act 2000*.

The objectives of this SDA are to:

- Identify all core business records of the Cemetery Boards;
- Identify which records are required for permanent retention as State archives and which records can be destroyed; and
- Establish retention periods for records that will be destroyed, so that they are kept for appropriate periods to satisfy legal, business or other requirements.

### **1.4 Scope and Implementation of this SDA**

This SDA covers the core-business or functional records of Cemetery Boards, being the:

- Albany Cemetery Board.
- Bunbury Cemetery Board.
- Chowerup Cemetery Board.
- Geraldton Cemetery Board.
- Kalgoorlie-Boulder Cemetery Board, and;
- Metropolitan Cemeteries Board (MCB).

This SDA supersedes SD 2012026 - Sector Disposal Authority for Cemetery Boards. Records already sentenced under SD 2012026 which are still in the custody of the Cemetery Boards will be re-sentenced as necessary in accordance with this SDA.

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This SDA applies to records in all formats.

Before any records covered in this SDA are destroyed or transferred to the State Records Office as State archives, they will be reviewed by the Chairperson of the Board or Chief Executive Officer (or delegate) and authorized for destruction or transfer.

A record of destroyed records and, where destruction is performed by an external contractor, certificates of destruction, provided by the contractor to the Board's authorized officer, will be retained in accordance with the *General Disposal Authority for State Government Information*.

The value of records may change over time. In assessing records that have reached their minimum retention period and are due for destruction, officers should consider those that may have potential business or historical value, for ongoing retention or archiving if warranted. Any records due for destruction that on re-assessment may have archival value should be referred to the State Records Office for further evaluation.

If, in any Board, any record categories are found, for example arising from a new function or a new record type, which are not covered by this SDA, they **must not be destroyed**. In such a situation the State Records Office must be contacted with a request to amend this SDA. No records in such a category are to be destroyed until approval is obtained from the State Records Commission to amend this SDA. Any unauthorized destruction of records is an offence under s78 of the *State Records Act 2000*.

### 1.5 Investigations, Inquiries and Freedom of Information

If an Investigation or Inquiry is in progress (or likely or imminent), or if a request for access to information under the *Freedom of Information Act 1992* has been lodged, all records relevant or subject to the Investigation / Inquiry / FOI request must be identified and retained until the action and any subsequent actions are completed. This applies regardless of whether the records in question are due for destruction.

### 1.6 Review of this SDA

The State Records Office, in conjunction with the Boards, will review the structure, coverage and content of this SDA within five years of its approval. The revised SDA will be submitted to the State Records Commission for approval prior to its implementation.

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### 2. SPECIFIC MATTERS

#### 2.1 “Significant” Records

In this SDA, each disposal class has usually been assigned one disposal action (e.g. 'Required as State archives' or 'Destroy').

If a disposal class contains records of both archival and non-archival value, two disposal actions have been assigned and:

- the term '**Significant**' has been used to identify records of archival value;
- the term '**Other**' has been used to identify records of non-archival value.

In such cases, the criteria for identifying which records are 'Significant' are that the records document matters which:

- Concern or affect Cemetery Board activity; or
- Concern major liabilities or obligations of the Cemetery Board; or
- Relate to the development of legislation, regulations or government policy; or
- Significantly impact or affect the Cemetery Board's functions or structure; or
- Were precedent setting; or
- Involved substantial public debate or controversy; or
- Generated wide community interest; or
- Caused major changes to Cemetery Board policy;
- Involved items or property considered to have cultural heritage value;

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- Involve large-scale infrastructure projects; or
- Involve property where contaminated or hazardous substances (e.g. asbestos, radiation) were present.

## 2.2 Archives Not Transferred to the State Records Office

All State archives identified in this SDA will be transferred to the State Records Office before or when they are 25 years old.

## 2.3 Restricted Access Archives

A restricted access archive is "a State archive that is a government record and to which access is restricted until it is of a certain age" (*State Records Act 2000, sect. 3*). Part 6 of the *State Records Act 2000* provides for the restriction of certain categories of State archives.

Any access restrictions that apply to State archives identified in this SDA are documented in a separate *Restricted Access Justifications* report.

## 3. DEFINITIONS

### 3.1 Definition of Terms

**Custody:** *means* the minimum retention period for which records are to be kept prior to their disposal. The Custody statement includes the disposal trigger that begins the retention period.

**Destroy:** *applies* to records identified as having temporary value and which will be destroyed once their retention period has expired.

**Disposal Action:** *means* the final disposition for records once their retention period has expired. The main disposal actions are "Required as State archive", "Destroy" and "Retain in agency".

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**Required as State archives:** *applies* to records identified as having permanent value. State archives are to be transferred to the State Records Office once their retention period has expired.

**Retain in Agency:** *applies* to records that have ongoing value to the Cemetery Board. These records are to be retained permanently by the Board, and successor agencies.

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No	Function/Activity	Description	Disposal Action	Custody
<i>FUNERALS AND MEMORIALS</i>				
1	<b>FUNERALS AND MEMORIALS</b>	<p>This section deals with the core records (i.e. Applications, Registers and Plans) associated with burials and cremations.</p> <p>See also the following sections (section 2 onwards) for other records that might be associated with funerals / burials / cremations.</p>		
1.1	<b>Applications</b>			
1.1.1		<p><u>All</u> records associated with successful applications for funeral, burial or cremation. Records may take the form of Application Forms, Application Support Files or similar. Records include, but may not be limited to:</p> <ul style="list-style-type: none"> <li>• Signed application forms, correspondence and approvals; and</li> <li>• Regulatory certificates, permits and authorisations.</li> </ul> <p>Matters dealt with include, but may not be limited to:</p> <ul style="list-style-type: none"> <li>• Burials and cremations.</li> <li>• Outside ashes, memorials only (no remains).</li> <li>• Mausoleum, monumental applications and permits; and</li> </ul>	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.

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No	Function/Activity	Description	Disposal Action	Custody
<i>FUNERALS AND MEMORIALS - Applications</i>				
		<ul style="list-style-type: none"> <li>• Pre-need memorial agreements, pre-need interment agreements and pre-need cremation agreements.</li> </ul> <p>Also includes:</p> <ul style="list-style-type: none"> <li>• Grant of Right of Burial and Grant of Right of Entombment - application, terms and conditions, renewal, replacement or transfer of grant.</li> </ul> <p><b>Note:</b> For the Metropolitan Cemeteries Board (MCB):</p> <ul style="list-style-type: none"> <li>• Information on the <b>Application Card / Form</b> is entered into the Electronic Records System (see Ref 1.2.1).</li> <li>• Cards / Forms are digitized and the images held on the Electronic Records System (see Ref 1.2.1).</li> <li>• Selected information on the <b>Application Support File</b> is entered into the Electronic Records System.</li> <li>• Records on the file are digitized and the images held on the Electronic Records System.</li> </ul>		
1.1.2		<p>Burial or cremation of unregistered stillborn babies, where not held on an Application card / file.</p> <p><b>Note:</b> Prior to 1999 the MCB held these records</p>	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.

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No	Function/Activity	Description	Disposal Action	Custody
<i>FUNERALS AND MEMORIALS - Applications</i>				
		separately to the Application card / file. From 1999 onwards see Application Cards and Application Support Files (Ref 1.1.1) and Electronic Records System (Ref 1.2.1).		
1.1.3		Applications for burial or cremation - unsuccessful, withdrawn or not proceeded with.	Destroy	Retain 7 years after action completed, then Destroy.
1.1.4		Applications on microfiche (for MCB only)  Microfiche of application cards, application support files and microfiche amendment files.  Note: Microfiche produced prior to MCB digitising application cards and support files. Microfiche not produced to archival quality and only produced for reference purposes. See Ref 1.1.1 for hard copy Application Cards and Support Files.	Destroy	after reference use ceases, then Destroy.
1.2	<b>Registers</b>			
1.2.1		Registers relating to the core business of the Cemetery Board. Registers may be in hard copy or digital format.  Details including: <ul style="list-style-type: none"> <li>• Details of all burials in the cemetery, including identification numbers of graves and the names and descriptions of the persons buried;</li> <li>• All grants of right of burial in the cemetery,</li> </ul>	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.

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No	Function/Activity	Description	Disposal Action	Custody
<i>FUNERALS AND MEMORIALS - Plans</i>				
		<p>including details of the assignments or bequests of grants;</p> <ul style="list-style-type: none"> <li>• Cremations containing the names and descriptions of any person cremated in the cemetery;</li> <li>• Persons cremated whose ashes have been buried or disposed in the cemetery;</li> <li>• Family rose memorials;</li> <li>• Niche wall positions; and</li> <li>• Burials within a redevelopment area.</li> </ul> <p><b>Note:</b> For the MCB, burial and register books to 1993 are in hard copy. Register books were replaced by the Electronic Records System. Information from the register books was entered into the Electronic Records System.</p> <p>Basic information from the MCBs system is available via the MCB website e.g. name, date of death, age, application number, grave location, grant number and status, memorial details.</p>		
1.3	<b>Plans</b>			
1.3.1		Master Plans of the cemetery showing the location and identifying number of every burial place or grave and the distribution of the land, compartments and	Required as State archives	Retain 25 years after action completed, then transfer to the SRO.

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No	Function/Activity	Description	Disposal Action	Custody
<i>FUNERALS AND MEMORIALS - Plans</i>				
		sections. Master Plans may be in hard copy or digital format.		
1.3.2		Versions of plans, hard copy or digital, i.e. drafts, working copies, duplicates.	Destroy	after reference use ceases, then Destroy.
2	<b>ARRANGEMENTS</b>	See also <i>General Disposal Authority for State Government Information</i> :  <ul style="list-style-type: none"> <li>• 8. ARRANGEMENTS</li> <li>• 89. SECURITY AND SURVEILLANCE</li> </ul> for records not covered in this section.		
2.1		Copies of webcast funerals held on DVD.	Destroy	Retain 2 years after action completed, then Destroy.
2.2		Mausoleum and ossuary certificates of entitlement - printouts from Cemeteries Records System (CRS) and used for ease of reference.	Destroy	after reference use ceases, then Destroy.
3	<b>AUTHORISATION</b>	See <i>General Disposal Authority for State Government Information</i> :  <ul style="list-style-type: none"> <li>• 11. AUTHORISATIONS / DELEGATIONS for records not covered in this section.</li> </ul>		
3.1		<ul style="list-style-type: none"> <li>• Authorisations for the placement of individual plaques.</li> </ul>	Required as State archives	Retain 10 years after action completed, then

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No	Function/Activity	Description	Disposal Action	Custody
<i>AUTHORISATION</i>				
		<ul style="list-style-type: none"> <li>• Authorisations for the management of memorials e.g. Homicide Victims Memorial</li> </ul>		transfer to the SRO.
3.2		Instructions and arrangements regarding the collection of ashes, where not held on the Application file.  <b>See related ACTIVITY:</b> <ul style="list-style-type: none"> <li>• 7. DISPOSAL for disposal of unclaimed ashes</li> </ul>	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.
3.3		Authorisations for the use of alternative caskets e.g. cardboard caskets, where not held on Application file.	Retain in agency	Retain in agency
3.4		Authorisations (seeking and granting permission) for: <ul style="list-style-type: none"> <li>• Filming a funeral.</li> <li>• Filming at a cemetery.</li> <li>• Conducting a wedding on cemetery property.</li> </ul>	Destroy	Retain 7 years after action completed, then Destroy.
3.5		Unsuccessful or rejected requests or requests not proceeded with for: <ul style="list-style-type: none"> <li>• Filming a funeral.</li> <li>• Filming at a cemetery.</li> <li>• Conducting a wedding on cemetery property.</li> </ul>	Destroy	Retain 2 years after action completed, then Destroy.
4	<b>CEMETERIES</b>			

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No	Function/Activity	Description	Disposal Action	Custody
<i>CEMETERIES</i>				
4.1		Matters associated with: <ul style="list-style-type: none"> <li>• Orders declaring land to be a cemetery.</li> <li>• Orders declaring a cemetery to be closed.</li> <li>• Orders declaring burials to be discontinued, including exceptions and qualifications set out in the order.</li> <li>• Vesting the care, control and management of a closed cemetery to a Cemetery Board; and</li> <li>• Assumption by a Cemetery Board the responsibility for the management of all or part of a cemetery.</li> </ul>	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.
5	<b>CEMETERY REDEVELOPMENT / RENEWAL</b>			
5.1		Redevelopment or renewal schemes of cemetery land. Includes, but may not be limited to: <ul style="list-style-type: none"> <li>• Plan/s of redevelopment area showing proposed development and all existing burial plots within the area.</li> <li>• Notices of intention to redevelop.</li> <li>• Historical Research &amp; Analysis.</li> </ul>	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.

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No	Function/Activity	Description	Disposal Action	Custody
<i>CEMETERY REDEVELOPMENT / RENEWAL</i>				
		<ul style="list-style-type: none"> <li>• Community Consultation.</li> <li>• Enquiries, complaints or objections.</li> <li>• Submissions received with respect to redevelopment.</li> <li>• Submissions to the Minister.</li> <li>• Approvals, modifications or rejection of redevelopment.</li> <li>• Management of redevelopment or renewal works.</li> <li>• Includes beautification works undertaken by the Cemetery Board.</li> </ul> <p><b>See related ACTIVITY:</b></p> <ul style="list-style-type: none"> <li>• 1. FUNERALS AND MEMORIALS for the Register of all burials within any redevelopment area.</li> </ul>		
5.2		Photographs (hard copy of digital) of headstones and grave sites within redevelopment areas taken before the headstones, kerbing etc. are removed.	Required as State archives	Retain 25 years after action completed, then transfer to the SRO.
6	<b>CONSERVATION</b>	<p><i>See General Disposal Authority for State Government Information:</i></p> <ul style="list-style-type: none"> <li>• 22. CONSERVATION for records not covered in this section.</li> </ul>		

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No	Function/Activity	Description	Disposal Action	Custody
<i>CONSERVATION</i>				
6.1		<ul style="list-style-type: none"> <li>• Conservation of cemetery sites and buildings.</li> <li>• Conservation of monuments.</li> <li>• Environmental management.</li> <li>• Conservation associated with cultural or Aboriginal heritage e.g. scarred tree in Fremantle Cemetery.</li> </ul>	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.
7	<b>DISPOSAL</b>	<p><i>See General Disposal Authority for State Government Information:</i></p> <ul style="list-style-type: none"> <li>• 2. ACQUISITION / DISPOSAL for records not covered in this section.</li> </ul>		
7.1		Disposal of unclaimed ashes or where no arrangements have been made for placement.	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.
8	<b>EXHUMATION / REPATRIATION</b>			
8.1		Exhumation of remains from burial site for entombment in mausoleum crypt or ossuary.	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.
8.2		Removal and reburial of Aboriginal remains.	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.

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No	Function/Activity	Description	Disposal Action	Custody
<i>LANDSCAPING</i>				
9	<b>LANDSCAPING</b>	<p><b>See also related ACTIVITY:</b></p> <ul style="list-style-type: none"> <li>• 12. MAINTENANCE</li> </ul>		
9.1		<p>Register of <b>significant</b> trees on cemetery land.</p> <p><i>(Trees that have been identified as significant by MCB / Board and registered with the National Trust of Australia)</i></p>	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.
9.2		Management of water bores, including installation, maintenance, monitoring of water usage, bore-reading logs, etc.	Retain in agency	Retain in agency
9.3		Landscaping services and programs. Includes weed control, tree pruning, hard landscaping, planting, etc.	Destroy	Retain 30 years after action completed, then Destroy.
9.4		Management and operation of plants nursery.	Destroy	Retain 3 years after action completed, then Destroy.
10	<b>LIAISON</b>	<p><i>See General Disposal Authority for State Government Information:</i></p> <ul style="list-style-type: none"> <li>• 61. LIAISON for records not covered in this section.</li> </ul>		
10.1		Liaison between the Cemetery Board and community, religious and ethnic groups e.g. regarding funerals, burials and memorials.	Required as State archives	Retain 25 years after action completed, then transfer to the SRO.

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No	Function/Activity	Description	Disposal Action	Custody
<i>LICENSING / PERMITS</i>				
11	<b>LICENSING / PERMITS</b>			
11.1		Statutory licensing of: <ul style="list-style-type: none"> <li>• Funeral directors, including applications, approvals, renewals, cancellations or suspensions.</li> <li>• Monumental masons including applications, approvals and renewals.</li> </ul>	Required as State archives	Retain 10 years after expiry of licence or permit, then transfer to the SRO.
11.2		Successful applications for: <ul style="list-style-type: none"> <li>• Single funeral permits; and</li> <li>• Single monumental work permits.</li> </ul>	Required as State Archives	Retain 10 years after expiry of licence or permit, or action completed, then transfer to SRO
11.3		Successful applications for: <ul style="list-style-type: none"> <li>• Licence to use and conduct a crematorium. Includes, but may not be limited to application, compliance certificate, correspondence and approval.</li> <li>• Licence or permit for music playing or performance on cemetery land.</li> </ul>	Destroy	Retain 7 years after expiry of licence or permit, then Destroy
11.4		Unsuccessful or refused applications or applications not proceeded with for licences / permits for: <ul style="list-style-type: none"> <li>• Funeral director.</li> </ul>	Destroy	Retain 7 years after action completed, then Destroy.

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No	Function/Activity	Description	Disposal Action	Custody
<i>MAINTENANCE</i>				
		<ul style="list-style-type: none"> <li>• Monumental mason.</li> <li>• Single funeral permits.</li> <li>• To use and conduct a crematorium.</li> </ul>		
12	<b>MAINTENANCE</b>	<p><b>See also related ACTIVITY:</b></p> <ul style="list-style-type: none"> <li>• 9. LANDSCAPING for maintenance on water bores and weed control.</li> </ul> <p><i>See General Disposal Authority for State Government Information:</i></p> <ul style="list-style-type: none"> <li>• 62. MAINTENANCE for records not covered in this section.</li> </ul>		
12.1		Maintenance and control of pests on cemetery land and property e.g. rabbits.	Destroy	Retain 30 years after action completed, then Destroy.

**LINKING TABLE: CHANGES TO REFERENCE NUMBERS AND DISPOSAL ACTIONS**

Increased Retention periods	New / changed entries in Red	Moved Sub-Activity	Deleted FUNCTION - use GDASG
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Ref. No.	Activity	Former Reference No. (SD 2012026)	New Reference No. (SD 2017008)	Change in Retention & Disposal
1.1.1	FUNERALS AND MEMORIALS - Applications	1.1.1	1.1.1	No change
1.1.2	FUNERALS AND MEMORIALS - Applications	1.1.2	1.1.2	No change
1.1.3	FUNERALS AND MEMORIALS - Applications	1.1.3	1.1.3	No change
1.1.4	FUNERALS AND MEMORIALS - Applications	1.1.4	1.1.4	No change
1.2.1	FUNERALS AND MEMORIALS - Registers	1.2.1	1.2.1	No change
1.2.2	FUNERALS AND MEMORIALS - Registers - Cemetery Board Electronic Records System	1.2.2	1.2.1	No change

Ref. No.	Activity	Former Reference No. (SD 2012026)	New Reference No. (SD 2017008)	Change in Retention & Disposal
1.3.1	FUNERALS AND MEMORIALS - Plans	1.3.1	1.3.1	Retention increased from 10 years to 25 years then transfer to SRO.
1.3.2	FUNERALS AND MEMORIALS - Plans	1.3.2	1.3.1	Retention increased from 10 years to 25 years then transfer to SRO.
1.3.3	FUNERALS AND MEMORIALS - Plans	1.3.3	1.3.2	No change
2	ACQUISITION	2	See GDASG Ref. 2. ACQUISITION / DISPOSAL	See GDASG
3.1	ARRANGEMENTS	3.1	See GDASG Ref. 8. ARRANGEMENTS 89. SECURITY AND SURVEILLANCE	See GDASG
3.2	ARRANGEMENTS	3.2	2.1	No change
3.3	ARRANGEMENTS	3.3	2.2	No change
4.1	AUTHORISATION	4.1	3.1	No change
4.2	AUTHORISATION	4.2	3.2	No change
4.3	AUTHORISATION	4.3	3.3	No change

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**Appendix A**

<b>Ref. No.</b>	<b>Activity</b>	<b>Former Reference No. (SD 2012026)</b>	<b>New Reference No. (SD 2017008)</b>	<b>Change in Retention &amp; Disposal</b>
4.4	AUTHORISATION	4.4	3.4	No change
4.5	AUTHORISATION	4.5	3.5	No change
5.1	CEMETERIES	5.1	4.1	No change
6.1	CEMETERY REDEVELOPMENT / RENEWAL	6.1	5.1	No change
6.2	CEMETERY REDEVELOPMENT / RENEWAL	6.2	5.2	Retain 25 years after action complete then transfer to SRO.
7.1	CONSERVATION	7.1	6.1	No change
8.1	CONSTRUCTION	8	See GDASG Ref. 23. CONSTRUCTION / CAPITAL WORKS	See GDASG
9.1	DISPOSAL	9.1	See GDASG Ref. 2. ACQUISITION / DISPOSAL	See GDASG
9.2	DISPOSAL	9.2	7.1	No change
10.1	EXHUMATION / REPATRIATION	10.1	8.1	No change
10.2	EXHUMATION / REPATRIATION	10.2	8.2	No change
11.1	INFRINGEMENTS	11	See GDASG Ref. 52.	See GDASG

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**Appendix A**

<b>Ref. No.</b>	<b>Activity</b>	<b>Former Reference No. (SD 2012026)</b>	<b>New Reference No. (SD 2017008)</b>	<b>Change in Retention &amp; Disposal</b>
			INFRINGEMENTS / LITIGATION / PROSECUTIONS	
12.1	INSPECTIONS	12	See GDASG Ref. 54. INSPECTIONS	See GDASG
13.1	INSTALLATION	13	See GDASG Ref. 55. INSTALLATION / COMMISSIONING	See GDASG
14.1	LANDSCAPING	14.1	9.1	No change
14.2	LANDSCAPING	14.2	9.2	No change
14.3	LANDSCAPING	14.3	9.3	No change
14.4	LANDSCAPING	14.4	9.4	No change
15.1	LIAISON	15.1	10.1	No change
16.1	LICENSING / PERMITS	16.1	11.1	No change
16.2	LICENSING / PERMITS	16.2	11.1	No change
16.3	LICENSING / PERMITS	16.3	11.2	No change
16.4	LICENSING / PERMITS	16.4	11.3	No change
16.5	LICENSING / PERMITS	16.5	11.3	No change
16.6	LICENSING / PERMITS	16.6	11.4	No change
17.1	MAINTENANCE	17.1	See 14. LANDSCAPING	No change

Ref. No.	Activity	Former Reference No. (SD 2012026)	New Reference No. (SD 2017008)	Change in Retention & Disposal
17.2	MAINTENANCE	17.2	See GDASG REF. 62. MAINTENANCE	See GDASG
17.3	MAINTENANCE	17.3	See GDASG Ref. 62. MAINTENANCE	See GDASG
18	PLANNING	18	See GDASG Ref. 71. PLANNING	See GDASG
19	REPORTING	19	See GDASG Ref. 82. REPORTING	See GDASG
20	REVIEWING	20	See GDASG Ref. 86. REVIEWING	See GDASG
21.1	SECURITY	21	See GDASG Ref. 89.5 SECURITY AND SURVEILLANCE	<b>Retain 31 days after image / footage recorded, then overwrite (destroy)</b>  <b>Retention increased by 1 day in amended GDASG</b>
21.2	SECURITY	21	See GDASG Ref. 89.5 SECURITY AND SURVEILLANCE	<b>Retain 31 days after image / footage recorded, then overwrite (destroy)</b>  <b>Retention increased by 24 days in amended GDASG</b>

Ref. No.	Activity	Former Reference No. (SD 2012026)	New Reference No. (SD 2017008)	Change in Retention & Disposal
22	WEBSITE	22	See GDASG Ref. 76. PUBLISHING / PUBLICATIONS	See GDASG