



Technical Specification

ISO/TS 7538

Functional requirements for disposition of records

*Exigences fonctionnelles pour le sort final des documents
d'activité*

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ISO copyright office
CP 401 • Ch. de Blandonnet 8
CH-1214 Vernier, Geneva
Phone: +41 22 749 01 11
Email: copyright@iso.org
Website: www.iso.org

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Foreword

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The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular, the different approval criteria needed for the different types of ISO document should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see www.iso.org/directives).

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This document was prepared by Technical Committee ISO/TC 46, *Information and documentation*, Subcommittee SC 11, *Archives/records management*.

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at www.iso.org/members.html.

Introduction

Disposition is an integral part of records management and allows organizations to reduce storage costs and save unnecessary time and expense managing records that are no longer required. Proper disposition also helps to ensure compliance, reduce risks, and preserve corporate and societal memory.

Disposition is the “range of records processes associated with implementing records retention, destruction or transfer decisions which are documented in disposition authorities or other instruments”. Disposition can be implemented:

- a) on the receipt or creation of a record;
- b) when the status of a record changes;
- c) when records no longer have any administrative, legislative, historical, or cultural value; or
- d) for long term preservation and archival purposes.

As set out in ISO 15489-1, taking a managed and documented approach to the disposition of records is an important aspect of the efficient and accountable management of records, and is part of a structured approach to records management.

Such an approach is normally considered during appraisal, subsequent retention schedule development, and records systems design. In best practice, disposition is part of business activities, rather than an ad hoc activity, and is done regularly according to records requirements.

Planning for, and having efficient and authorized systems and processes in place to guide disposition supports accountability, efficiency, and good governance, while ensuring that records are controlled in an appropriate manner for a range of purposes.

This document assumes that requirements related to the disposition of records are identified during appraisal, as described in ISO/TR 21946.

Appraisal is the process of analysing and evaluating business functions and processes, business context, and risk to determine records requirements. Results of the appraisal can be used in disposition decisions. Appraisal decisions should be implemented through processes documented in disposition authorities or other instruments.

This document is not intended to give guidance on how the appraisal process is designed, implemented, or undertaken. Guidance on appraisal can be found in ISO/TR 21946.

Implementing a disposition authority involves carrying out the disposition actions identified through the appraisal process. It is a process that includes:

- reviewing whether it is permitted for records to be disposed of;
- undertaking the disposition action;
- documenting that the disposition has taken place.

Disposition actions are usually undertaken on a regular and routine basis. However, some disposition actions can require a one-off or ad hoc process. For example, when a record is sold to a third party for commercial purposes or when an organizational function is transferred to another agency. In these circumstances, the implementation of disposition is appropriate to the disposition action and risk management considerations.

This document also supports organizations in implementing disposition by design, which involves analysing disposition requirements and implementing measures at early stages of the design and development of products, processes, systems or services that involve handling records.

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Functional requirements for disposition of records

1 Scope

This document identifies the purpose and benefits of disposition and provides organizations with guidance about how to manage disposition-related processes. In particular, it:

- specifies responsibilities for records disposition processes;
- provides guidance on the key areas against which records disposition processes can be assessed;
- provides requirements and guidance for those implementing disposition processes; and
- provides guidance on how to integrate records disposition processes into an organization's operations.

2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

ISO 15489-1, *Information and documentation — Records management — Part 1: Concepts and principles*

ISO 18128, *Information and documentation — Records risks — Risk assessment for records management*

ISO 16175-1:2020, *Information and documentation — Processes and functional requirements for software for managing records — Part 1: Functional requirements and associated guidance for any applications that manage digital records*

ISO 30300, *Information and documentation — Records management — Core concepts and vocabulary*

ISO 31000, *Risk management — Guidelines*

3 Terms and definitions

For the purposes of this document, the terms and definitions given in ISO 30300 and the following apply.

ISO and IEC maintain terminological databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <https://www.iso.org/obp>
- IEC Electropedia: available at <https://www.electropedia.org/>

3.1

disposition action

action taken to dispose of a record in response to the applicable disposition authority

Note 1 to entry: individual entry in the disposition authority usually includes a disposition action along with a retention period and an event from which the disposal date should be calculated.

3.2

disposition trigger

event that triggers the start of the retention period or the execution of the disposition action

4 Purpose and benefits

Disposition supports effective business, compliance and mitigation of security and privacy risks. Examples of benefits of disposition are listed below.

From a business point of view:

- cost reduction, workload reduction, release of resources and storage (including cloud);
- reduction of the cost of supporting legacy infrastructure;
- enhancement of operating efficiency (e.g. search efficiency);
- elimination of health hazards (e.g. mould or pest infestation); and
- management of corporate data, information, records, and knowledge (including rearrangement, archiving).

From a societal point of view:

- preservation of memory and knowledge of permanent value; and
- reduction of the environmental impact of storage and management to support action on climate change.

From a legal point of view:

- compliance (e.g. with archival law, privacy laws); and
- enhancement of legal and evidentiary value of digital copies by disposing of paper-based originals, after following the guidelines for digitization of records as described in ISO/TR 13028

From a risk management point of view:

- reduction of the risk of security incidents, such as disclosure of sensitive and confidential information; and
- reduction of the risks to the business that can occur when records retention is not managed in accordance with business requirements.

Disposition benefits should be considered along with the relevant costs and risks.

5 Principles

The organization shall comply with the following principles when performing disposition:

- **legality:** decisions about disposition of records are based on applicable legal requirements;
- **authority:** disposition of records shall be authorized by top management or delegate;
- **accountability:** top management shall be accountable for the disposition of records for which they are responsible;
- **informed decision making:** disposition actions shall be based on an informed decision-making process;
- **justification:** disposition actions and retention periods for the records shall be justified;
- **planning:** disposition of records shall be planned and undertaken according to any existing external and internal requirements and integrated into the organization's business processes and programs;
- **timeliness:** records shall be disposed of in a timely manner;
- **security:** disposition of records shall be undertaken using a secure method so that the content is protected and is not inadvertently released or lost;

- by design: disposition of records shall be considered from the first stages of systems and processes design; and
- sustainability: disposition of records shall be undertaken in accordance with sustainability requirements.

6 Disposition requirements

6.1 General

Disposition is an integral part of records management. Organizations shall consider decisions about disposition throughout the records management process. The development of disposition authorities, including retention schedules, and determination of whether records should be destroyed at the end of their life-cycle or transferred to another entity are informed by the results of the appraisal process. Consideration of disposition processes can also help prevent the imposition of legal or regulatory sanctions.

It is important to recognize disposition as a part of good records management processes, controls, and systems. Effective disposition requires records to be managed in accordance with ISO 15489-1. Disposition is part of a management system for records as described in ISO 30301.

Records systems and processes shall be designed to support disposition.

In cases where records are created within a business system, incorporating disposition by design as an integral component of systems architecture is particularly important. This integration enables the efficient and effective disposition of records when the time is right. By integrating disposition considerations during the design phase, organizations can ensure the appropriate management and disposition of records in compliance with legal and operational requirements.

When the records system and process are designed, it is important to consider data, information, and/or records disposition issues from the early stages of their development. Such an approach follows the principle of disposition by design, and covers:

- the disposition-related functionality in systems;
- the defining and assigning tasks and responsibilities as part of disposition processes; and
- the information architecture of the solutions (e.g. database structures).

Implementing disposition by design means adhering to the following principles:

- integrating disposition requirements into the design of systems and processes; and
- proactive implementation of disposition measures to anticipate risks and prevent negative events.

6.2 Governance of disposition

6.2.1 General

Regular and routine disposition begins with a records management framework, including procedures for the creation and classification of records, and is supported by appropriate technical and personnel support.

Staff undertaking disposition shall have an appropriate knowledge of the value of the records and the organizational policies and procedures relevant to the disposition activities that they carry out.

It is important that disposition is appropriately authorized.

6.2.2 Authorization of disposition

Disposition authorities are instruments that define and prescribe the disposition actions for different record groups or classes. They support organizational accountability by providing evidence of decisions and justification of actions, in the event that they are challenged.

Disposition authorities shall be based on the analysis of the legal, regulatory, policy, business, and societal requirements that impact different record types. This means that the level of detail shall match the nature of the records being disposed of and the contingent risks. The decision makers shall be confident that there is no legitimate operational, legal or audit need for the organization to retain the records. This means that the nature of the records being disposed of shall determine the appropriate level of organizational authorization. For example, disposition of ephemeral or facilitative records may be authorized by an organizational policy and implemented by the records' creator. Disposition of core operational records, however, shall be documented with the appropriate detail, and then approved by an appropriate person(s) who can ensure that there is no legitimate operational, legal or audit need for the records to be further retained.

Disposition authorities should be concise and easy to understand and use.

In public organizations, disposition authorities can be authorized by an external archive authority or regulator. However, private organizations can also develop disposition authorities based on their own business needs and regulatory requirements.

The development of disposition authorities is described in ISO 15489-1.

Disposition shall be undertaken as set out in authorised disposition authorities. Some disposition authorities can cover the whole organization where others can represent different functions or parts of the organization. Care shall be taken to ensure that all relevant disposition authorities are taken into account (and reconciled where appropriate) in the framework of an organisation's disposition program. This is particularly so in organizations that operate across multiple jurisdictions.

It is also possible that some records are covered by several disposition authorities or parts of disposition authorities. In such cases, they shall be retained until the longest retention period elapses.

From a records management point of view, an entry in a disposition authority typically defines:

- the records covered;
- the status of a record;
- relevant legislative and regulatory references;
- references to other relevant disposition authorities;
- the disposition trigger initiating the retention period;
- retention periods;
- disposition actions;
- due diligence (see [6.4.2](#)); and
- roles and responsibilities for managing the disposition.

6.2.3 Reviewing and updating disposition authorities

Context changes can affect records management requirements in ways that require a revision of the original appraisal decision or the application of a disposition authority. These can include:

- ongoing business needs;
- the need to retain records for foreseeable, pending, or actual legal action or investigations;
- changes to legislative or regulatory requirements;
- administrative changes affecting an organization's functions or business activities; and
- changes in societal expectations for the disposition of records.

It is important that the organization regularly reviews and, when necessary, updates disposition authorities so that they are aligned with their current environment. Superseded versions of disposition authorities shall be retained to demonstrate the legality and consistency of past disposition actions.

6.3 Disposition policies

Disposition shall be supported by policies stating the organization's commitment to a compliant, equitable and efficient approach. The policy shall also clearly define relevant responsibilities and identify relevant stakeholders. Documenting disposition policies supports organizational accountability by providing evidence of recognition and response to organizational change. This enables organizations to defend their disposition decisions and actions if challenged.

Organizations shall document disposition policies and consider the following:

- the legislative framework under which it operates;
- the interests of relevant stakeholders, including other organizations;
- how the organization manages its records in relation to its functions; and
- the level of documentation that is required to be created or maintained.

The policies shall be reassessed in the event of substantial contextual changes.

This recommendation shall be understood and implemented in line with routine business practices and available resources. This means that the level of detail in the policies shall reflect the nature of the records being disposed of and the contingent risks.

6.4 Disposition processes

6.4.1 General

All aspects of disposition shall follow a documented process. Records shall be assigned a retention period. Where a retention period depends on a trigger (an event), there shall be a way to link the trigger to the records. Triggers can be:

- internal events in information systems (e.g. creation or modification date); and
- external events that shall be communicated to the information system (e.g. the death of a person or the destruction of a building).

Triggers can be applied on individual records or on aggregations of records.

In a best practice environment the management system for records will ensure that all records are subject to a disposition authority and there is regular review of when records are due for disposition. Also, records systems should have a disposition authority in place and are configured to create a report on which records are eligible for disposition. Based on these reports, the organization shall review the records that are eligible for disposition before taking action.

6.4.2 Processes

Disposition processes shall ensure the mitigation of risks due to premature destruction or over-retention of records (including controlled and uncontrolled copies of those records). Organizations need to find the right process to mitigate risks resulting from the nature of the records and specific challenges of their business environments. The organization can decide the order of the processes shown in [Table 1](#).

Table 1 — Disposition processes

| Disposition processes | Explanation |
|--|---|
| Create a report of records that are eligible for disposition | A report is created with an overview of records which are nominated for disposition, for instance those whose retention period has passed. The report should be used for due diligence actions. |
| Performing due diligence on the records being considered for disposition | Disposition actions shall be reviewed prior to implementation to ensure that the requirements for the records have not changed. This includes a series of checks and stakeholder consultation to identify whether any circumstances apply that warrant disposition being postponed. Examples include: <ul style="list-style-type: none"> — litigation, legal action, or investigations that are underway or foreseeable; — Freedom of Information applications that are underway; and — disposition holds due to government investigations. The outcome of due diligence can be: <ul style="list-style-type: none"> — no change to the intended disposition action; — a change to the disposition action; <ul style="list-style-type: none"> — postponing the disposition action (e.g. a hold); or — the need to re-appraise the records for extended retention. For further information on disposition holds see 6.5.3 |
| Selecting records for disposition | Records due for disposition are logically or physically separated from other records stored in the same environment |
| Final authorisation of records for disposition | The disposition action is approved by an authorized person. |
| Execution of disposition actions | Actual transfer or destruction of the selected records. The records in the original location can be destroyed after receiving confirmation of a successful transfer process. |
| Evidence of disposition actions | Evidence of disposition actions should be retained. |

Disposition processes shall also incorporate requirements for record metadata. A record’s metadata shall be managed according to the record’s disposition requirements. So, if the record is to be retained, transferred, or destroyed, the metadata shall be managed in the same way.

However, in some cases, some metadata for records can be required to be retained beyond the record’s assigned retention period (for example for accountability or statistical purposes), so care shall be taken to ensure compliance in such cases.

6.4.3 Documenting disposition

Organizations shall document the disposition policies, procedures, processes, and activities so that they are able to justify and account for their disposition actions.

Disposition documentation shall be managed as records. If required, organizations shall be able to make this information available to justify disposition decisions. This includes the disposition authority and any documentation and metadata supporting interpretation and implementation of the disposition authority where necessary.

6.4.4 Disposition actions

6.4.4.1 Transfer of records

Records transfer is defined in ISO 30300 as moving the custody of records from one organization to another; which can involve a change of location, control, or legal ownership.

Transfer of records can include moving them to:

- an archival institution;
- another organization; or
- another business unit.

Transfer can be a consequence of legal requirements, business decisions, sale of records, or donation.

Planning for this process enables efficient use of organizational resources and ensures that all parties involved with a transfer understand the risks and have adequate time to make appropriate arrangements.

Where the disposition process includes transferring custody or control of records, it is important to ensure that the level of security is maintained during the entire disposition process, including transit. It is also important that special care is taken to ensure that appropriate access arrangements have been decided and agreed with the entity that will take custody and/or control of the records.

Planning for the appropriate protection of records during transfer takes into account:

- all appropriate access arrangements for records, including access risks during the transfer;
- metadata requirements relating to the authenticity, integrity, reliability, accessibility, and useability of the records (particularly for digital records);
- specific requirements for how records are packaged and transferred to the receiving organization, business unit, or information system;
- the requirements and capacity of all supporting systems and resources involved with implementing transfers or performing preservation actions; and
- the transfer of ownership along with custody, particularly when records are moved from one system to another.

Where the disposition process includes discharge or sale, it is important to ensure that records are taken into the custody and control of the person or organization authorized to receive the records.

Third parties engaged in records disposition shall be able to certify that all relevant security provisions—as agreed with the owner organization—will be followed.

Disposition processes for records of historical value can take place entirely within an organization, or through transferring control and/or custody of the records to an archival institution. In the digital environment organizations shall ensure that all metadata and the package of information are in line with the requirements of relevant international standards.

Transfer processes require good planning, to ensure appropriate protection and preservation of the records.

6.4.4.2 Destruction of records

Where the disposition requires the destruction of records, those records shall be destroyed in a manner that is appropriate to their content, media type, and related security and access restrictions. Appropriate security considerations may also apply to any metadata created as part of the disposition process.

Complete and irreversible destruction ensures that the records being destroyed cannot be recovered or reconstructed. Failure to ensure the complete destruction of records can lead to the unauthorized discovery, reconstruction, or disclosure of sensitive information.

Jurisdictions and business sectors can have specific disposition requirements and the organization shall be aware of this.

Destruction shall be documented.

6.5 Exceptional circumstances and their implications for disposition

6.5.1 General

In best practice, disposition is part of regular business activities, rather than an ad hoc activity. However, appraisal decisions and approved disposition policies and procedures can be overridden in certain exceptional circumstances. These circumstances can either lead to disposition of records earlier than specified in the disposition authority, or disposition holds. For examples of disposition challenges and possible solutions, see [Annex A](#).

Wherever possible, systems that manage records shall be flexible enough to manage disposition exceptions. Systems that manage digital records shall address these requirements in accordance with ISO 16175-1:2020, 6.3 (R2.1.4), ISO 18128 and ISO 31000.

6.5.2 Disposition due to exceptional events

Exceptional events which can lead to early disposition include but are not limited to:

- analogue records or digital media constituting a health hazard due to mould, chemical, biological, or radioactive contamination, etc.;
- a substantial risk that highly sensitive or classified records can be captured by or leaked to an adversary party during war, physical and cyber-attacks, and natural and man-made disasters;
- a substantial risk of the loss of control of or misuse of the records stored by a third party or when in the cloud (e.g. due to the third party going out of business, contract termination, or hostile actions such as taking records hostage in the case of a business dispute, or a risk of forced access by a foreign government);
- records or media being rendered completely unusable and/or unrecoverable due to physical damage, hacking, ransomware attacks, decommissioning of the essential infrastructure, or loss of essential competencies; and
- business disruption such as liquidation or bankruptcy.

Such circumstances can warrant urgent actions such as immediate destruction or transfer without orderly authorization or compliance with existing retention and disposition policies. However, even in such exceptional circumstances, proper authorization shall be sought whenever practically possible.

Where feasible and economically viable, recovery of records and information with non-expired retention periods shall be undertaken. For example, in the case of contaminated records, analogue copies can be produced or the records can be migrated to new clean digital media. Business partners or government bodies can also be asked to provide copies of the records (where they exist) from their holdings.

Information security or business continuity policies and procedures can also include urgent disposition of records and information. Records professionals responsible for disposition shall cooperate with other organizational functions to ensure the consistency of these policies and procedures.

6.5.3 Disposition holds

Disposition holds are imposed by duly authorized internal or external persons or bodies and prohibit the execution of disposition until the hold is lifted. Disposition holds can be triggered by:

- ongoing or expected litigation;
- freedom of information requests;
- e-discovery obligations; and
- orders or requirements to preserve evidence related to ongoing or foreseeable investigations and court cases.

The organization shall have policies and procedures for managing disposition holds including that:

- only those records relevant to the hold requirement are prevented from being disposed of;
- it reviews records on hold to confirm that the hold continues to be applicable;
- mandates to issue, implement, review, and lift holds are appropriately allocated;
- disposition holds are communicated across the organization;
- compliance with the hold is monitored; and
- all related activities of the hold are properly documented.

7 Performance evaluation and improvement

7.1 General

Disposition shall be evaluated and continuously improved. This includes processes, policies, and activities.

The organization shall determine:

- what needs to be monitored and measured;
- applicable monitoring, measurement, analysis, and evaluation methods to ensure valid results (in digital environments monitoring includes creating audit logs or analyzing information from them);
- when the monitoring and measurement shall be performed; and
- when the results from monitoring and measurement shall be analyzed and evaluated.

An organization shall monitor its changing technological and legal landscape and regularly review the adequacy of its disposition processes.

Any problems in disposition activities and noncompliance issues shall be identified, documented, and addressed.

To ensure effective evaluation and continuous improvement organizations should consider implementing the methodology described in ISO 30301:2019, Clause 10.

7.2 Monitoring, measurement, analysis and evaluation

Monitoring and review of all disposition activities shall be regularly undertaken by the organization as part of the wider monitoring of the records management activity.

Regular monitoring and review of disposition activities provides assurance that:

- organizational policies and processes are being followed;
- accountability and business requirements for the disposition of records are up to date;
- records management practices are being appropriately applied in order for disposition activities and processes to be carried out as intended;
- disposition authorities are being interpreted correctly and implemented accurately; and
- disposition activities and processes are efficient and effective.

Monitoring disposition activities can also identify weaknesses in other records management activities, such as appraisal. Such weaknesses shall be addressed as a part of continuous improvement of the records management function or communicated directly to the persons responsible for such activities.

Annex A
(informative)

Disposition challenges

A.1 General

There are many challenges to consider when undertaking disposition, particularly in digital environments. This is because records are often dispersed across multiple systems and devices, which can put records outside of the direct control of an organization and its records management function.

In organizations where records processes are not in line with good practice records management, such as ISO 30301 and ISO 15489-1, many aspects of disposition are likely to be challenging.

[Table A.1](#) provides examples of common disposition challenges caused by poor records management practices.

Table A.1 — Examples of challenges and possible solutions

| Challenge | Possible solutions — the organization should ensure that: |
|---|---|
| No disposition of records because they have not been identified as records. | — appraisal is performed regularly and in accordance with business needs in order to identify and capture records |
| No disposition of records in systems because these systems are not being treated as records systems. | — it identifies all systems that create and contain records; — all systems that contain or create records are treated as records systems; and — appropriate records policies and practices are applied to the systems. |
| No disposition of records because they are not included in the disposition authority. | — it identifies all of its transactions and activities; — it reviews its disposition authorities to ensure that they include all the identified business activities; and — disposition authorities are applied to all of the records resulting from the transactions related to these activities. |
| After transfer, users are unable to understand or extract full value from records over time due to missing context or metadata. | — the transfer process is in accordance with the transfer protocol; and — the transfer protocol includes requirements for metadata and other documentation. |
| No disposition of records due to lack of business context. | — records are classified according to business requirements; and — records are linked to the correct business activity. |

Organizations also face challenges caused by lack of resources, technology changes, and changes in the legal landscape. Changes in the context of an organization should be analyzed as part of the appraisal process. New or changing requirements which that are the result of contextual changes may affect existing records management practices, including disposition authorities. The following includes some causes and consequences of disposition issues.

- inability to appraise the records properly using traditional approaches (due to high volume, employees leaving the organization, mergers and acquisitions, liquidation etc.). Which calls for additional measures like the Capstone method;
- inability to apply traditional records processes to a variety of digital records (databases, blockchain, research and development records, digital health records, digital models and maps, etc.);

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- inability to delete or transfer the records (records on WORM media, blockchain, databases, legacy systems or systems with no records management controls, proprietary essential software, etc.);
- overlapping or multiple legal holds;
- inability to identify copies for disposition;
- noncooperation from keepers of records;
- lack of appropriate expertise or resources at the receiving organization to enable or support records transfer;
- uncertainty about the receiving organization's mandate to preserve certain records, or uncertainty about the ownership;
- over-retention due to failure to obtain the required consents; and
- poor relationship with cloud service provider or storage provider.

The impacts of incomplete destruction include:

- the ability to recover or reconstruct partially or incompletely destroyed records;
- failure to comply with organizational requirements or customers' assurances regarding personal information;
- failure to comply with legal and regulatory requirements; and
- extra storage costs.

The persistence of electronic records and metadata presents challenges with electronic records destruction, data protection compliance, and an organization's need to have measures to ensure the destruction of personal information.

Proactively identifying and addressing risk management issues supports effective disposition. Organizations should assess their systems and procedures against potential risk and find ways to mitigate or manage them.

The following list includes actions that can create risks and that should be considered when undertaking records disposition:

- noncompliance with legal and regulatory retention requirements;
- destroying records with business, historical, or public interest value;
- not performing disposition/unimplemented disposition processes;
- poorly performed disposition;
- over-retention;
- failure to ensure privacy and security during disposition;
- the existence of uncontrolled copies;
- failure to document the disposition; and
- losing control of the records after a transfer of custody.

Further information on risk management can be found in ISO 18128.

Disposition can also be challenging if there is no efficient cooperation between the records management function and legal and business departments and other stakeholders. For example, if an organization is legally required to transfer its records of permanent value to an external archive, close cooperation with the archival institution is essential.